Forest Service
U.S. DEPARTMENT OF AGRICULTURE

Intermountain Region/Ashley National Forest April 2023

Final Environmental Impact Statement for Revision of the Ashley National Forest Land Management Plan

Pre-Objection Version Volume III - Appendices B-H

Cover images clockwise from top*: Above the Lake Fork Drainage looking east toward Tungsten Pass, Mount Lovenia in foreground; participants at the Ute Indian Tribe Powwow in Fort Duchesne; Flaming Gorge National Recreation Area; Ute Mountain Fire Lookout. Photos credit: USDA Forest Service.*

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Acronym or Abbreviation	Full Term
ATV	all-terrain vehicle
BLM	U.S. Department of the Interior, Bureau of Land Management
CCF	hundred cubic feet
CE	Categorical Exclusion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DEIS	draft environmental impact statement
EIS	environmental impact statement
EO	executive order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FGNRA	Flaming Gorge National Recreation Area
FLPMA	Federal Land Policy and Management Act
Forest Service	United States Department of Agriculture Forest Service
GIS	geographic information systems
HVRA	high-value resource area
IAP	Intermountain Adaption Partnership
IPaC	USFWS Information for Planning and Conservation
IRA	inventoried roadless area
mcf	thousand cubic feet
MBF	thousand board feet
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHD	National hydrology dataset
NHPA	National Historic Preservation Act
NRA	National Recreation Area
NRCS	Natural Resources Conservation Service
NRGA	National Recreation and Geologic Area
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
NWSRS	National Wild and Scenic Rivers System
OHV	off-highway vehicle
ORV	outstandingly remarkable value
PM	particulate matter
PM_{10}	particulate matter less than 10 micrometers in diameter
$PM_{2.5}$	particulate matter less than 2.5 micrometers in diameter

RNA ..... research natural area
ROS ..... recreation opportunity spectrum
ROW ..... right-of-way
SCC ..... species of conservation concern
SIO ..... scenic integrity objectives
SMS ..... Scenery Management System

Tg ..... teragram

UDWR ..... Utah Division of Wildlife Resources
USC ..... United States Code
USDA ..... United States Department of Agriculture
USFWS ..... United States Fish and Wildlife Service

VCC ..... vegetation condition class
VCMQ ..... vegetation classification, mapping, and quantitative inventory
VMS ..... Visual Management System
VQO ..... visual quality objective

WCF ..... watershed condition framework

Appendix B

Comparison of Action Alternative Plan Components

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Appendix B. Comparison of Action Alternative Plan Components

Introduction

40 CFR 1505.1 requires agency procedures to encompass a reasonable range of alternatives to manage Forest Service-administered lands on the Ashley National Forest. The following tables illustrate the differences in plan components between alternatives. The full text for alternative B modified (in the revised forest plan) should be used when comparing the proposed alternative language in the tables below. The language in alternative B modified is the proposed language for the forest plan except where alternative language and figures are provided in the tables below. Only differences in plan components are shown; all other plan components or management approaches as written in the forest plan apply to the range of action alternatives unless stated otherwise.

Notable Changes Between Draft and Final

The following is a summary of the key changes made to plan component wording that differs by alternative.

Changes to alternative B modified:

- Forest Vegetation—A factual correction was made to acres of treatment from 1,500 to 2,400 acres. The objective (FW-OB-CONIF-01) now reads "Complete forested vegetation management treatments, such as timber harvest, planned ignitions, thinning, and planting, every year on an average of 2,400 acres annually . . ."
- Bighorn sheep—Management direction for bighorn sheep was updated; see plan wildlife guidelines (FW-GD-WILDL-09 and 10) and goal (FW-GO-WILDL-03). Modifications include updated direction for providing separation between domestic sheep and bighorn sheep, focusing on collaboration with State agencies, utilizing memorandums of understanding, and applying site-specific management strategies described in domestic sheep permit annual operating instructions.
- Timber—Annual timber sale harvest objectives (FW-OB-TIMB-01 and 02) are included for the first decade, and a footnote was added that states that the CCF is "...the annual projected timber (and wood) sale quality and for the first decade. Refer to appendix 4 for the projected timber (and wood) sale quantity for the second decade. Estimates of timber outputs may be larger or smaller on an annual basis if legal authorities, management efficiencies, or unanticipated constraints change in the future." Goal 01 in the draft forest plan was changed to a desired condition (FW-DC-TIMB-04).
- Livestock Grazing—Livestock grazing management direction was edited to provide for additional site-specific flexibility (see guidelines FW-GD-GRAZ-01 and 02).
- Recreation—The summer recreation opportunity spectrum acres were updated. Primitive acres are now 276,400 (from 286,700), and semiprimitive acres increased to 362,300 (from 351,900 acres). Scenic integrity objectives were updated as follows: acres of very high scenic integrity were reduced by approximately 10,000 acres, and acres of moderate and low scenic integrity were increased. These changes are a result of not carrying forward recommended wilderness as a management area. In addition, the objective for providing new dispersed camping docs was removed from the comparison of alternatives. This plan direction was not included in the forest plan.

- Recommended wilderness—No recommended wilderness was carried forward under alternative B modified. These areas are now allocated as backcountry recreation management areas and designated as inventoried roadless areas.

Notable changes between alternative C in the draft EIS and alternative C in the final EIS are summarized below:

- Forest vegetation—The objective for average annual vegetation management treatments was updated from 1,000 acres (800 acres in the second decade) to an average of 1,800 acres annually (1,600 acres in the second decade). A factual correction was made to Alternative B Modified and the other alternatives were corrected accordingly.
- Wildlife—Updated the approach for minimizing contact between domestic sheep and bighorn sheep by focusing on applying site-specific management strategies described in domestic sheep permit annual operating instructions. Revised guidelines related to closure of domestic sheep or goat grazing allotments.

Notable changes between alternative D in the draft EIS and alternative D in the final EIS are summarized below:

- Forest vegetation—Increased the target objective for average annual vegetation management treatments from 1,600 acres (1,300 acres in the second decade) to an average of 2,500 acres annually (1,300 acres in the second decade).
- Livestock grazing—Added livestock grazing guidelines that focus on development of site- and species-specific annual indicators and described grazing management strategies at the allotment management plan level using annual monitoring indicators and multi-year vegetation trend data to determine if allotments are meeting desired conditions.
- Wildlife—Management direction for bighorn sheep was updated; see plan wildlife guidelines (FW-GD-WILDL-10) and goal (FW-GO-WILDL-03). Modifications include updated direction for providing separation between domestic sheep and bighorn sheep, focusing on collaboration with State agencies, utilizing memorandums of understanding, and applying site-specific management strategies described in domestic sheep permit annual operating instructions. Revised the domestic sheep and goat grazing guidelines to utilize closed or vacant allotments or forage reserves outside of bighorn sheep core herd home range when permitting new allotments for domestic sheep or goats.

Forest Plan Identifier Codes

Table B-1 provides the planning component and acronym coding key for the subsequent individual tables. Tables B-2 to B-11 provide a comparison of differences in planning components for forestwide direction, while tables B-12 to B-16 provide a comparison of planning components for management area and designated area direction. Tables B-17 to B-22 provide projected forestwide vegetation management practices under each action alternative.

Plan components are provided in a standardized format as follows:

The forest plan contains a specific coding system to identify desired conditions, goals, objectives, standards, and guidelines and where they apply using a pattern like this: AA-BB-CCC. The series of letters before the first dash references the level of direction (for example, FW = forestwide and DA = designated area). The middle series of letters reference plan component types (for example, DC for desired condition, OB for objectives, GD for guidelines, ST for standard, and GO for goals). The resource

area is the third series of letters (such as WATER for watershed and SOIL for soil). See table B-1 for resource area acronyms.

Table B-1. Planning Component and Acronym Coding Key

Acronym	Full Phrase
Level of Direction	
FW	Forestwide
DA	Designated Area
MA	Management Area
Plan Component Type	
DC	Desired Condition
ST	Standard
GD	Guideline
OB	Objective
SUIT	Suitability
GO	Goal
Resource Area	
AIR	Air Quality
SOIL	Soils
WATER	Watershed and Groundwater-Dependent Ecosystems
VEGTER	Terrestrial Ecosystems
ATRISK	Terrestrial Vegetation, At-Risk Plant Species
VEGF	Forested Vegetation
ASPEN	Forest Vegetation, Aspen
PJ	Forest Vegetation, Pinyon-Juniper Woodlands
VEGNF	Non-forest Vegetation
ALPINE	Non-forest Vegetation, Alpine
SHRUB	Non-forest Vegetation, Desert Shrub
SAGE	Non-forest Vegetation, Sagebrush
RAREHAB	Rare and Unique Habitats
FIRE	Fire
CLIM	Adapting to Climate Change
CARBON	Carbon Storage and Sequestration
FISH	Fisheries and Aquatic Ecosystems
WILDL	Wildlife
SOCEC	Social and Economic Sustainability
TRIBE	Areas of Tribal Importance
HIST	Cultural and Historic Resources
TIMB	Timber
GRAZ	Livestock Grazing
LANDSU	Land Special Uses
MINL	Energy and Minerals
GEOL	Geologic Resources and Hazards
ROAD	Transportation Infrastructure
FAC	Facilities Infrastructure
ROS	Recreation Opportunity Spectrum
RECDEV	Developed Recreation Sites
RECDIS	Dispersed Recreation

Acronym	Full Phrase
RECSU	Recreation Special Uses
RECOG	Outfitters and Guides
RECRES	Recreation Residences
RECTEC	Emerging Recreation Technology
RECEV	Recreation Events
RECGP	Non-Commercial Group Use
VISEDU	Visitor Education and Interpretation
SCENIC	Scenic Resources
FGNRA	Flaming Gorge National Recreation Area
HUW	High Uintas Wilderness
AKNGRA	Ashley Karst National Recreation and Geologic Area
WSR	Wild and Scenic Rivers
BYWAY	National Scenic Byways
IRA	Inventoried Roadless Areas
RNA	Research Natural Areas
SWETT	Swett Ranch
UML	Ute Mountain Fire Lookout Tower
STATN	Historic Ranger Stations
CARTER	Carter Military Road
RMADEST	Destination Recreation Management Area
RMAGENL	General Recreation Management Area
RMABACK	Backcountry Recreation Management Area
HVRA	Protection of High Value Resource Areas
RECWIL	Preliminary administrative recommendation of wilderness

Plan Sections with Alternative Wording

Forest Vegetation

Table B-2. Plan Component Differences Between Action Alternatives: Forestwide Direction—Forested Vegetation

Alternative A	Alternative B Modified	Alternative C	Alternative D
Site preparation for natural regeneration (annual basis for first decade: 1,100 acres. This acreage involves lodgepole pine stands, which can be improved through silvicultural treatment. These areas include stagnated stands (usually under 3" diameter), large pole sized stands (6"–7" in diameter) that are 80 percent or more dead from mountain pine beetle attack, and partial cut stands that do not have enough remaining basal area alive to recover.) Standards and guidelines related to treatments are Management Area-specific[1] and are as follows: Plan one precommercial thinning by age 15 (Management Areas b, d, e, f, l) Plan one or more commercial thinning (Management Areas b, d, e, f, l) Plan two or more commercial thinnings (l) Precommercially thin only 40 percent and commercial thin only 12 percent of harvested acres (n and n1)	**Objective (FW-OB-CONIF-01)** To complete forested vegetation management treatments, such as timber harvest, planned ignitions, thinning, and planting, every year on an average of 2,400 acres (2,100 acres in the second decade) of the Ashley National Forest (measured every 10 years) to maintain or move toward achieving desired conditions for forested ecosystems. Tables B-17 and B-18 display the projected annual vegetation management practices.	**Objective (FW-OB-CONIF-01)** To complete forested vegetation management treatments (such as timber harvest, thinning, and planting) on 1,800 acres (1,600 acres in the second decade) of the Ashley annually, measured on a decadal basis, to maintain or move toward achieving desired conditions for forested ecosystems. Tables B-19 and B-20 display the projected annual vegetation management practices.	**Objective (FW-OB-CONIF-01)** To complete forested vegetation management treatments (such as timber harvest, thinning, and planting) on 2,500 acres (2,200 acres in the second decade) of the Ashley annually, measured on a decadal basis, to maintain or move toward achieving desired conditions for forested ecosystems. Tables B-21 and B-22 display the projected annual vegetation management practices.

Timber

Table B-3. Plan Component Differences Between Action Alternatives: Forestwide Direction—Timber

Alternative A	Alternative B Modified	Alternative C	Alternative D
Opening limits are identified for specific Management Areas in the 1986 Forest Plan: Clearings up to 20 acres are permitted (Management Areas e and l) Clearings up to 40 acres are permitted (Management Areas b, f, k, n, n1, p, and r) Clearings up to 60 acres are permitted (Management Areas d and k) Standards and guidelines that address harvesting trees adjacent to openings are Management Area specific and are as follows: Stands may be harvested adjacent to openings that are 90 percent stocked with trees that have survived for a minimum of 2 years (Management Area b and d) Stands may be harvested adjacent to openings that have reached an average height sufficient to provide hiding cover for the Management Indicator Species using the area (Management Area e and n)	**Standard (FW-ST-TIMB-08)** Limit openings created by clearcutting, seed-tree cutting, shelterwood seed cutting, or other cuts designed to regenerate an even-aged stand of timber in one harvest operation to a maximum of 40 acres. This standard applies to new, individual harvest proposals on National Forest System lands only and need not consider existing openings on National Forest System land, adjacent private land, or other agency lands. • Openings will no longer be considered openings once a new crop of trees meeting minimum stocking requirements becomes established. • There may be exceptions to the 40-acre maximum opening size when determined necessary to achieve desired ecological conditions for the plan area, such as those associated with forest patterns, patch sizes, and forest resilience in the short and long term.	**Standard (FW-ST-TIMB-08)** Limit openings created by clearcutting, seed-tree cutting, shelterwood seed cutting, or other cuts designed to regenerate an even-aged stand of timber in one harvest operation to a maximum of 40 acres. This standard applies to new, individual harvest proposals on National Forest System lands only and need not consider existing openings on National Forest System land, adjacent private land, or other agency lands. • Openings will no longer be considered openings once a new crop of trees meeting minimum stocking requirements becomes established. • Harvest openings created as a result of a single harvest operation that exceed the maximum opening size require a 60-day public review and regional forester approval.	Same as alternative B modified

<table>
<tr><th>Alternative A</th><th>Alternative B Modified</th><th>Alternative C</th><th>Alternative D</th></tr>
<tr>
<td>(continued)</td>
<td>

Maximum opening sizes under this exception are shown below.

<table>
<tr><th>Vegetation Type</th><th>Maximum Opening Size (Acres)</th></tr>
<tr><td>Persistent lodgepole pine</td><td>200</td></tr>
<tr><td>Seral aspen</td><td>100</td></tr>
</table>

Harvest openings created by a single harvest operation that exceed the maximum opening size require a 60-day public review and regional forester approval.

</td>
<td>(continued)</td>
<td>(continued)</td>
</tr>
</table>

Alternative A	Alternative B Modified	Alternative C	Alternative D
Timber harvest levels are limited to 21 MMBF during the first decade. Projected average annual outputs in million cubic feet (MMCF) are as follows:[2] Sawtimber (softwood): 1985-1990: 4.5 1991-2000: 4.5 2001-2010: 3.5 2011-2020: 3.5 2021-2030: 3.9Sawtimber (hardwood) 1985-1990: 0 1991-2000: 0 2001-2010: 0.7 2011-2020: 0.7 2021-2030: 0.3Roundwood 1985-1990: 0.6 1991-2000: 0.6 2001-2010: 0.5 2011-2020: 0.5 2021-2030: 0.5Fuelwood 1985-1990: 10.4 1991-2000: 9.4 2001-2010: 9.2 2011-2020: 6.8 2021-2030: 5.9	**Objective (FW-OB-TIMB-01)** To annually offer timber (meeting timber product utilization standards) for sale at an average projected timber sale quantity of 3,806[3] one hundred cubic-feet [CCF] (1,145 thousand board-feet [MBF], measured on a decadal basis. See table 4-1 in the forest plan, appendix 4.	**Objective (FW-OB-TIMB-01)** To annually offer timber (meeting timber product utilization standards) for sale at an average projected timber sale quantity of 2,822 to 2,842 CCF (795 to 805 MBF), measured on a decadal basis.	**Objective (FW-OB-TIMB-01)** To annually offer timber (meeting timber product utilization standards) for sale at an average projected timber sale quantity of 3,956 to 3,983 CCF (1,190 to 1,204 MBF), measured on a decadal basis.

Alternative A	Alternative B Modified	Alternative C	Alternative D
Make available a minimum of 12,000 cords of firewood for personal use (Management Areas b, d, e, f, k, l, n, n1, p, and r)[3]	**Objective (FW-OB-TIMB-02)** To annually offer commercial timber and other wood products (including fuelwood, biomass, and other products that do not meet timber product utilization standards) for sale at an average annual projected wood sale quantity of 3,806[3] CCF (1,145 MBF), measured on a decadal basis. See table 4-1 in the forest plan, appendix 4.	**Objective (FW-OB-TIMB-02)** To annually offer wood products, including fuelwood, biomass, and other volumes that do not meet timber product utilization standards, for sale at an average annual projected wood sale quantity of 2,822 (2,842 in decade 2) CCF (795 to 805 MBF), measured on a decadal basis.	**Objective (FW-OB-TIMB-02)** To annually offer wood products, including fuelwood, biomass, and other volumes that do not meet timber product utilization standards, for sale at an average annual projected wood sale quantity of 3,956 (3,983 CCF in decade 2) (1,190 to 1,204 MBF), measured on a decadal basis.

[2] An MBF/CCF conversion factor of 0.466667 was used to match the outputs found on page IV-58 in the 1986 forest plan (Forest Service 1986) to the 21 MMBF allowable sale quantity for decade 1. These volumes are not considered achievable due to the reduction of suitable timber base from approximately 490,000 acres to approximately 130,000 acres.

[3] 3,806 CCF is the annual projected timber (and wood) sale quantity for the first decade. Refer to the forest plan, appendix 4, for the projected timber (and wood) sale quantity for the second decade. Estimates of timber outputs may be larger or smaller on an annual basis if legal authorities, management efficiencies, or unanticipated constraints change in the future.

Fire and Protection of Highly Valued Resources or Assets

Table B-4. Plan Component Differences Between Action Alternatives: Forestwide Direction—Fire and Protection of Highly Valued Resources or Assets

Alternative A	Alternative B modified	Alternative C	Alternative D
No comparable objectives under alternative A.	**Objective (FW-OB-FIRE-01)** Based on the historical disturbance regimes, use wildland fire and other vegetation treatments to move toward or maintain desired conditions on approximately 6,600 to 32,000 acres per year (table B-5) utilizing the full range of fuel reduction methods, consistent with forestwide, designated area, and management area direction.[1]	**Objective (FW-OB-FIRE-01)** Same as alternative B modified.	**Objective (FW-OB-FIRE-01)** Based on the historical disturbance regimes, use wildland fire and other vegetation treatments to improve or maintain desired vegetation conditions on 10,000 to 40,000 acres per year during the life of the plan (table B-5). The full range of fuel reduction methods is authorized, consistent with forest and management area emphasis and direction.
No comparable objectives under alternative A.	**Objective (FW-OB-FIRE-02)** Every 10 years, manage natural unplanned ignitions to meet resource objectives associated with the vegetation types (table B-5) on 10 percent of the ignitions.	**Objective (FW-OB-FIRE-02)** Every 10 years, manage natural unplanned ignitions to meet resource objectives associated with the vegetation types (table B-5) on 20 percent of the ignitions.	**Objective (FW-OB-FIRE-02)** Every 10 years, manage natural unplanned ignitions to meet resource objectives associated with the vegetation types (table B-5) on 5 percent of the ignitions.

[1] Annual treatment acres may be affected by acreage burned by wildfire. Large wanted or unwanted wildfires will not preclude the Forest from trying to achieve targeted acreage per this plan or project-level NEPA.

Alternative A	Alternative B modified	Alternative C	Alternative D
No comparable guidelines under alternative A.	**Guideline (FW-GD-FIRE-01)** Within sensitive areas, such as wilderness, fire management tactics should include minimum impact suppression tactics (MIST).	Same as alternative B modified	**Guideline (FW-GD-FIRE-01)** MIST are only used in wilderness. All tactics and resources are available for suppression tactics.
No comparable objectives under alternative A.	**Guideline (FW-GD-FIRE-04)** Outside highly valued resources or assets, fuel treatments to promote fire severity based on the historical disturbance regimes by vegetation type (see table 9 in forest plan) should be used to support ecosystem sustainability and other resource desired conditions.	Same as alternative B modified	**Objective (FW-GD-FIRE-04)** All fuel treatments are designed to support protection of developed resources and suppress fire behavior.
No comparable objectives under alternative A.	**Objective (FW-OB-HVRA-01)** To protect highly valued resources or assets and create fire-resilient landscapes by treating hazardous fuels on 1,000 to 3,000 acres annually around highly valued resources or assets as shown in a hazard risk analysis and with partnership cooperation.	No comparable objective	**Objective (FW-OB-HVRA-01)** During the first 5 years of the plan, promote collaboration with private industry and outside interests to increase the percentage of fire resilient landscapes around HVRAs. Annually treat a minimum of 5,000 to 10,000 acres.
No comparable guidelines under alternative A.	**Guideline (FW-GD-HVRA-01)** If assurances can be made for public safety, managers should consider using fire to achieve management objectives.	Guideline **(FW-GD-HVRA-01)** Same as alternative B modified	Guideline **(FW-GD-HVRA-01)** Fire to achieve management objectives is prohibited in HVRAs.

Alternative A	Alternative B modified	Alternative C	Alternative D
No comparable goals under alternative A.	**Goal (FW-GO-HVRA-02)** Collaborate with partners, adjacent landowners, private industry, and outside interests to increase the percentage of fire-resilient landscapes around highly valued resources or assets.	No comparable goal	Same as alternative B modified

[3] These volumes are not considered achievable due to the reduction of suitable timber base from approximately 490,000 acres to approximately 130,000 acres.

Table B-5. Potential Number of Acres Burned per Decade and Desired Severity, Based on Vegetation Type

Vegetation Types	Dominant Fire Regime Groups	Total Acres	Fire Frequency in Years	Potential Acres Managed per Decade Based on Historical Fire Regime Groups (Acres, Low to High)	Percent of Fires in Each Severity Class
Ponderosa pine	I	37,855	6–60	6,309–63,092	Low: 55 Mixed: 39 High: 6
Lodgepole pine	V	76,786	90–200	3,839–8,532	Low: 19 Mixed: 0 High: 6
Douglas-fir	I, III	47,773	35–200	2,389–13,649	Low: 75 Mixed: 14 High: 81
Mixed conifer	V	310,807	200–300	10,360–15,540	Low: 0 Mixed: 2 High: 11
Engelmann spruce	V	144,492	200–400	3,612–7,225	Low: 0 Mixed: 20 High: 98

Vegetation Types	Dominant Fire Regime Groups	Total Acres	Fire Frequency in Years	Potential Acres Managed per Decade Based on Historical Fire Regime Groups (Acres, Low to High)	Percent of Fires in Each Severity Class
Miscellaneous	I	12,769	75–290	440–1,703	Low: 79 Mixed: 0 High: 80
Seral aspen	I, III, IV	117,137	13–70	16,734–90,105	Low: 0 Mixed: 54 High: 21
Persistent aspen	I	35,480	20–300	1,183–17,740	Low: 0 Mixed: 46 High: 46
Sagebrush	III, IV	120,726	40–100	12,073–30,182	Low: 0 Mixed: 0 High: 100
Pinyon-juniper	III, IV	122,268	150–200	6,113–8,151	Low: 5 Mixed: 65 High: 29
Desert shrub	IV	68,823	100–240	2,868–6,882	Low: 0 Mixed: 0 High: 100

Sources: Utah fire groups described in Bradley et al. (1992); Huber et al. (2017); LANDFIRE (2020) Biophysical Settings and Mean Fire Return Interval

Livestock Grazing

Table B-6. Plan Component Differences Between Action Alternatives: Forestwide Direction—Livestock Grazing

Alternative A	Alternative B Modified	Alternative C	Alternative D
Limit forage utilization by livestock of key browse species on big game winter range to 20 percent. Prepare and implement a range allotment management plan for each grazing allotment, including recreation horse use, that will identify proper use levels.	**Guideline (FW-GD-GRAZ-01)** To ensure sustainability and resiliency of forage resources in upland and riparian areas, develop site- and species- specific annual indicators such as stubble height and utilization criteria during grazing allotment planning, and document these indicators in allotment management plans. In the absence of updated planning or an approved allotment management plan, limit utilization of key forage species to no greater than 50 percent of current year's growth and leave a four-inch or greater stubble height of palatable herbaceous species at the end of the grazing season between greenline and bank full of stream systems, unless monitoring demonstrates a different utilization use level or stubble height is appropriate.	**Guideline (FW-GD-GRAZ-01)** To ensure sustainability and resiliency of forage resources, limit utilization of key forage species to no greater than 40 percent of current year's growth	**Guideline (FW-GD-GRAZ-01)** Develop site- and species-specific annual indicators such as stubble height, stream bank alteration, woody vegetation utilization, and upland utilization during grazing allotment planning, and document them in allotment management plans. In the absence of updated planning or an approved allotment management plan, limit utilization of key forage species to no greater than 50 percent, unless monitoring demonstrates a different allowable use level is appropriate.

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable guidelines under Alternative A	**Guideline (FW-GD-GRAZ-02)** To ensure sustainability and resiliency of ecological conditions, describe grazing management strategies in allotment management plans. Use annual monitoring indicators as well as multi-year vegetation trend data to determine if allotments are meeting desired conditions as described in **(FW-DC -VEGNF**) and to inform and modify grazing management strategies such as time, timing, and intensity, when necessary to meet or move toward desired conditions.	**Guideline (FW-GD-GRAZ-02**) To ensure sustainability and resiliency of forage resources in riparian areas leave a four-inch or greater stubble height of palatable herbaceous species at the end of the grazing season between greenline and bankfull of stream systems.	**Guideline (FW-GD-GRAZ-02**) To ensure sustainability and resiliency of ecological conditions, describe grazing management strategies at the allotment management plan level. Use annual monitoring indicators as well as multi-year vegetation trend data to determine if allotments are meeting desired conditions as described in **(FW-DC -VEGNF**) and to inform and modify grazing management strategies such as time, timing, and intensity, when necessary to meet or move toward desired conditions.

Cultural and Historic Resources

Table B-7. Plan Component Differences Between Action Alternatives: Forestwide Direction—Cultural and Historic Resources

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable objectives under alternative A.	**Objective (FW-OB-HIST-01)** To increase the ability of the Ashley National Forest to preserve cultural and historic resources by completing at least 200 acres of cultural surveys to identify and document cultural resource sites each year.	**Objective (FW-OB-HIST-01)** To increase the ability of the Ashley National Forest to preserve cultural and historic resources by completing at least 400 acres of cultural surveys to identify and document ten cultural resource sites each year for the life of the plan.	**Objective (FW-OB-HIST-01)** To increase the ability of the Ashley National Forest to preserve cultural and historic resources by completing at least 100 acres of cultural surveys to identify and document two cultural resource sites each year for the life of the plan.

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable objectives under Alternative A.	**Objective (FW-OB-HIST-04)** To enhance public understanding and increase awareness of cultural and historic resources by evaluating five cultural resources for eligibility to the National Register of Historic Places.	**Objective (FW-OB-HIST-04)** To enhance public understanding and increase awareness of cultural and historic resources by evaluating ten cultural resources each year for eligibility to the National Register of Historic Places.	**Objective (FW-OB-HIST-04)** To enhance public understanding and increase awareness of cultural and historic resources by evaluating one cultural resource each year for eligibility to the National Register of Historic Places.

Wildlife

Table B-8. Plan Component Differences Between Action Alternatives: Forestwide Direction—Wildlife

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable goal under alternative A	**Goal (FW-GO-WILDL-03)** Minimize the risk of contact between bighorn sheep and domestic sheep or domestic goats through collaboration with the State of Utah, such as utilizing memorandums of understanding and applying site-specific management strategies described in domestic sheep permit annual operating instructions that strive to minimize the risk of contact between the two species.	Same as alternative B modified	Same as alternative B modified

Alternative A	Alternative B Modified	Alternative C	Alternative D
Sheep allotments that remain unutilized for a period of 5 years may be considered for conversion to another class of livestock or closed.	**Guideline (FW-GD-WILDL-09)** When a domestic sheep or goat grazing permit for an allotment is voluntarily waived without preference, and if the allotment does not provide separation from bighorn sheep, then authorized use of the allotment should provide separation of domestic sheep and bighorn sheep by one or more of the following methods: (1) mitigate the threat of pathogen transfer from domestic sheep or goats to bighorn sheep consistent with the most current State bighorn sheep management plans, (2) mitigate the threat of pathogen transfer from domestic sheep or domestic goats to bighorn sheep in accordance with reasonable management guidelines pursuant to a new site-specific memorandum of understanding, (3) leave the allotment vacant of domestic sheep and goats, (4) work with the State of Utah to remove or translocate bighorn sheep, or (5) implement another method that would provide separation of the species or that would reduce the threat of pathogen transfer from domestic sheep to bighorn sheep.	**Guideline (FW-GD-WILDL-09)** Domestic sheep or goat grazing allotments that are voluntarily waived without preference and do not provide separation from bighorn sheep will be closed to provide separation of domestic and bighorn sheep.	No comparable guideline
No comparable guideline under alternative A	**Guideline (FW- GD-WILDL-10)** New permitted domestic sheep or goat allotments should not be authorized unless the Ashley National Forest determines, based on local information and the best available science, that separation of the allotment from bighorn sheep will be obtained. This guideline does not apply to the use of pack goats for recreational use, nor to existing domestic sheep or goat grazing permits waived with preference.	**Guideline (FW-GD-WILDL-10)** Do not issue new domestic sheep or goat grazing permits within current bighorn sheep core herd home range.	**Guideline (FW- GD-WILDL-10)** Utilize closed, vacant allotments, or forage reserves outside of bighorn sheep core herd home range when permitting new allotments for domestic sheep or goats.

Land Status and Ownership/Lands and Special Uses

Table B-9. Plan Component Differences Between Action Alternatives: Forestwide Direction—Land Status and Special Uses

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable guideline under alternative A.	No comparable guideline	No comparable guideline	**Goal (FW-GO-LANDSU)** Work with organizations to maintain and represent current individual inholdings.
No comparable goal under alternative A.	**Goal (FW-GO-LANDSU-01)** Encourage the formation of user associations in lieu of individual special-use permits and rights-of-way in common-use facilities, uses, or areas. Incorporate multiple permits to the same organization into one permit if this facilitates permit administration.	Same as alternative B modified.	**Goal (FW-GO-LANDSU-01)** The Forest may prioritize organizations that represent multiple permittees during the permitting process.
No comparable objective under alternative A.	No comparable guideline	**Objective (FW-OB-LANDSU)** Every five years, consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest.	**Objective (FW-OB-LANDSU)** Annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest.

Soils

Table B-10. Plan Component Differences Between Action Alternatives: Forestwide Direction- Soils

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable guideline under alternative A	**Guideline (FW-GD-SOIL-02)** Areas occupied by landings, temporary roads, and main skid trails in timber projects and timber sales should, post-project reclamation, have a minimum of 60 percent effective ground cover for distances needed on those surfaces (project-specific) to protect soil resources from erosion and prevent recreational use. For soil inventory purposes, effective ground cover is expressed as a percentage of material, other than bare soil on the land surface. It includes coarse woody debris, litter, duff, surface rocks (large gravels, cobbles, stones, boulders, and rock outcrop), biological crusts, and vegetation in contact with the soil. This estimate of ground cover differs from other resource protocols.	**Guideline (FW-GD-SOIL-02)** Areas occupied by landings, temporary roads, and main skid trails in timber projects and timber sales should, post-project reclamation, have a minimum of 85 percent effective ground cover for up to 500 feet on those surfaces (project-specific) to protect soil resources from erosion and prevent recreational use. For soil inventory purposes, effective ground cover is expressed as a percentage of material, other than bare soil on the land surface. It includes coarse woody debris, litter, duff, surface rocks (large gravels, cobbles, stones, boulders, and rock outcrop), biological crusts, and vegetation in contact with the soil. This estimate of ground cover differs from other resource protocols.	Same as alternative B modified
No comparable guideline under alternative A	**Guideline (FW-GD-SOIL-04)** Ground-based mechanical equipment for vegetation management should not be operated in areas where sustained grades exceed 40 percent. This is to minimize the likelihood of soil compaction, displacement and erosion. Exceptions may be made in specific harvesting, felling, skidding, and yarding operations where soil, slope, and equipment types and harvest methods are determined appropriate to maintain soil quality.	**Guideline (FW-GD-SOIL-04)** Ground-based mechanical equipment for vegetation management should only operate on slopes less than 40 percent in order to minimize the likelihood of soil compaction, displacement and erosion.	**Guideline (FW-GD-SOIL-04)** Ground-based mechanical equipment should avoid use on slopes greater than 40 percent and mitigate potential impacts by the use of protective slash and coarse woody debris cover on slopes.

Transportation and Facilities Infrastructure

Table B-11. Plan Component Differences Between Action Alternatives: Forestwide Direction—Transportation and Facilities Infrastructure

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable goal under alternative A	No comparable goal	No comparable goal	**Goal (FW-GO-TRAIL)** Consider adding additional loops and routes for motorized activities.
No comparable goal under alternative A	No comparable goal	No comparable goal	**Goal (FW-GO-FAC)** Consider expanding existing campgrounds to accommodate larger trailers and OHV users.

Backcountry Recreation Management Area

Table B-12. Plan Component Differences Between Action Alternatives: Backcountry Recreation Management Area Direction

Alternative A	Alternative B modified	Alternative C	Alternative D
No comparable management area under alternative A	**Objective (MA-OB-RMABACK-01)** To improve 5 miles of existing nonmotorized National Forest System trails for mountain bike use every 5 years if user groups are available to assist in improvement work.	No comparable objective	**Objective (MA-OB-RMABACK-01)** To improve 10 miles of existing nonmotorized National Forest System trails for mountain bike use every 5 years if user groups are available to assist in improvement work.
No comparable management area under alternative A	**Suitability (MA-SUIT-RMABACK-01)** Backcountry recreation management areas are suitable for wheeled motorized travel consistent within the recreation opportunity spectrum settings as assigned and on designated roads, trails, and areas, but motorized trails are a minimal part of the trail network,	**Suitability (MA-SUIT-RMABACK-01)** Backcountry recreation management areas are not suitable for wheeled motorized travel.	**Suitability (MA-SUIT-RMABACK-01)** Backcountry recreation management areas are suitable for wheeled motorized travel consistent within desired recreation opportunity spectrum settings as assigned and on designated roads, trails, and areas.
No comparable management area under alternative A	No comparable standard	**Standard (MA-ST-RMABRA)** Timber harvest shall not occur in the backcountry recreation management areas.	No comparable standard

General Recreation Management Area

Table B-13. Plan Component Differences Between Action Alternatives: General Recreation Management Area Direction

Alternative A	Alternative B modified	Alternative C	Alternative D
No comparable management area under alternative A	**Objective (MA-OB-RMAGENL-01)** To construct, within 5 years of plan approval, a minimum of 10 miles of trails designed and constructed for mountain bikes as the primary users, dependent on ability of local user groups or partnerships are identified to conduct annual trail maintenance.	No comparable objective	**Objective (MA-OB-RMAGENL-01)** To expand recreational opportunities, construct 20 miles of trails designed and constructed for mountain bikes if local user groups or partnerships are identified to conduct annual trail maintenance.
No comparable management area under alternative A	**Objective (MA-OB-RMAGENL-02)** To improve or maintain 1 mile of road to dispersed camping sites every 3 years.	Same as alternative B modified	**Objective (MA-OB-RMAGENL-02)** To improve 4 miles of road to dispersed camping sites every 3 years.
No comparable management area under alternative A	**Objective (MA-OB-RMAGENL-03)** To construct two off- highway vehicle loop trails (no more than 60 inches wide) within 10 years of plan approval, dependent on ability of local user groups or partnerships to conduct annual trail maintenance.	No comparable objective	**Objective (MA-OB-RMAGENL-03)** To construct two off- highway vehicle loop trails within 10 years of plan approval, dependent on ability of local user groups or partnerships to conduct annual trail maintenance.
No comparable management area under alternative A	**Objective (MA-OB-RMAGENL-04)** To widen 10 miles of National Forest System 50-inch-wide or narrower off-highway vehicle trails to no more than 60 inches wide within 5 years of plan approval, through cooperation with local motorized-use groups to identify trails that have the highest use by side-by-side, off-highway vehicles and identified trails and can be converted without negative impacts on resource issues.	No comparable objective	**Objective (MA-OB-RMAGENL-04)** Same as Alternative B modified

Alternative A	Alternative B modified	Alternative C	Alternative D
No comparable management area under Alternative A.	**Objective (MA-OB-RMAGENL-05)** To improve 2 miles of motorized trails every 3 years if local user groups are available to assist in improvement work.	No comparable objective	**Objective (MA-OB-RMAGENLRA-05)** To improve 6 miles of motorized trails every 3 years if local user groups are available to assist in improvement work.

Destination Recreation Management Areas

Table B-14. Plan Component Differences Between Action Alternatives: Destination Recreation Management **Area Direction**

Alternative A	Alternative B modified	Alternative C	Alternative D
No comparable management area under alternative A	**Objective (MA-OB-RMADEST-01)** To chip seal or slurry seal 2 miles of roads within the destination recreation management area every 5 years, if road conditions warrant maintenance.	Same as alternative B modified	**Objective (MA-OB-RMADEST-01)** To chip seal or slurry seal 6 miles of roads within the Destination Recreation management Area every 5 years, if road conditions warrant maintenance.
No comparable management area under alternative A	**Objective (MA-OB-RMADEST-02)** To improve facilities and infrastructure at five developed campgrounds every 10 years for the life of the plan, emphasizing areas with higher use and in a deteriorated condition.	Same as alternative B modified	**Objective (MA-OB-RMADEST-02)** To improve facilities and infrastructure at eight developed campgrounds every 10 years for the life of the plan, emphasizing areas with higher use and in a deteriorated condition.
No comparable management area under alternative A	No comparable standard	**Standard (MA-ST-RMADEST)** Grazing is excluded from destination recreation management areas.	No comparable standard

Research Natural Areas

Table B-15. Plan Component Differences Between Action Alternatives: Research Natural Areas Direction

Alternative A	Alternative B modified	Alternative C	Alternative D
No comparable suitability plan component under alternative A	No comparable suitability plan component	Suitability (DA-SU-RNA) New right-of-ways are unsuitable within RNAs.	No comparable suitability plan components

Recommended Wilderness

Table B-16. Plan Component Differences Between Action Alternatives: Recommended Wilderness Areas Direction

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	Desired Condition (DA-DC-WIL) Preliminary administrative recommendation of wilderness areas maintain their existing ecological and social wilderness characteristics, so as to preserve opportunities for inclusion in the National Wilderness Preservation System.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	Desired Condition (DA-DC-WIL) Preliminary administrative recommendation of wilderness areas provide outstanding opportunities for solitude or primitive and unconfined recreation, and impacts from visitor use do not detract from the natural setting.	No comparable recommended wilderness areas

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	Desired Condition (DA-DC-WIL) Preliminary administrative recommendation of wilderness areas are characterized by a natural environment where ecological processes—such as natural succession, wildfire, avalanches, insects and disease—function as the primary forces affecting the environment.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	Desired Condition (DA-DC-WIL) System trails support wilderness experiences and preserve wilderness characteristics.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	Desired Condition (DA-DC-WIL) Outfitter and guide recreation special uses support identified public need and provide service to the extent necessary for realizing the recreational purposes of the preliminary administrative recommendation of wilderness areas.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	Guideline (DA-GD-WIL) New range improvements associated with existing allotments should be authorized only for the purpose of improving wilderness characteristics or for resource protection.	No comparable recommended wilderness areas

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	**Guideline (DA-GD-WIL)** Restoration activities (such as prescribed fire, active weed management) should protect and/or enhance the wilderness character of these areas.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	**Standard (DA-ST-WIL)** New commercial communication sites shall not be allowed.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	**Standard (DA-ST-WIL)** Construction of new roads, temporary roads, access routes, and motorized trails shall not be allowed.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	**Standard (DA-ST-WIL)** Timber harvest shall not be allowed.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	**Standard (DA-ST-WIL)** New energy/utility corridors shall not be allowed.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	**Standard (DA-ST-WIL)** New recreation events shall not be allowed.	No comparable recommended wilderness areas
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	**Standard (DA-ST-WIL)** New recreation developments shall not be allowed, aside from needed trails infrastructure	No comparable recommended wilderness areas

Alternative A	Alternative B Modified	Alternative C	Alternative D
No comparable recommended wilderness areas under alternative A	No comparable recommended wilderness areas	**Guideline (DA-GD-WIL)** Restoration activities (such as prescribed fire, active weed management) should protect and/or enhance the wilderness character of these areas.	No comparable recommended wilderness areas

Projected Forestwide Vegetation Management Practices by Alternative

Table B-17. Alternative B Modified—Projected Forestwide Vegetation Management Practices (Annual Average Acres First Decade)

Forest Cover Types	Improvement/ Selection (Uneven-aged harvest)	Regeneration* (Even-aged harvest)	Thinning (Intermediate harvest)	Sanitation/ Salvage (Intermediate harvest)	Pre-commercial Thinning (Intermediate treatment)	Prescribed Fire
Mixed Conifer	16	57	0	187	43	18
Engelmann Spruce	0	3	0	29	0	0
Lodgepole Pine	0	107	32	178	428	7
Douglas-Fir	10	5	0	33	0	12
Ponderosa Pine	203	1	0	79	127	829
Persistent Aspen	0	2	0	0	0	28
Woodland	0	0	0	0	0	0
Total**	229	175	32	506	598	893

Regeneration harvest treatment includes clearcuts, shelterwoods, shelterwood removal, and seedtree methods.
** Totals may not add up due to rounding.

Table B-18. Alternative B Modified—Projected Forestwide Vegetation Management Practices (Annual Average Acres Second Decade)

Forest Cover Types	Improvement/ Selection (Uneven-aged harvest)	Regeneration* (Even-aged harvest)	Thinning (Intermediate harvest)	Sanitation/ Salvage (Intermediate harvest)	Pre-commercial Thinning (Intermediate treatment)	Prescribed Fire
Mixed Conifer	16	57	0	187	43	18
Engelmann Spruce	9	1	0	29	0	0
Lodgepole Pine	0	107	32	178	107	7
Douglas-Fir	10	5	0	33	0	12
Ponderosa Pine	203	1	0	79	127	829
Persistent Aspen	0	2	0	0	0	28
Woodland	0	0	0	0	0	0
Total**	239	174	32	506	277	893

Regeneration harvest treatment includes clearcuts, shelterwoods, shelterwood removal, and seedtree methods.
** Totals may not add up due to rounding.

Table B-19. Alternative C—Projected Forestwide Vegetation Management Practices (Annual Average Acres First Decade)

Forest Cover Types	Improvement/ Selection (Uneven-aged harvest)	Regeneration* (Even-aged harvest)	Thinning (Intermediate harvest)	Sanitation/ Salvage (Intermediate harvest)	Pre-commercial Thinning (Intermediate treatment)	Prescribed Fire
Mixed Conifer	12	44	0	109	33	0
Engelmann Spruce	0	2	0	17	0	0
Lodgepole Pine	0	88	26	132	351	0
Douglas-Fir	10	5	0	18	0	0
Ponderosa Pine	104	1	0	53	65	739
Persistent Aspen	0	2	0	0	0	6
Woodland	0	0	0	0	0	0
Total**	126	141	26	331	449	746

Regeneration harvest treatment includes clearcuts, shelterwoods, shelterwood removal, and seedtree methods.
** Totals may not add up due to rounding.

Table B-20. Alternative C—Projected Forestwide Vegetation Management Practices (Annual Average Acres Second Decade)

Forest Cover Types	Improvement/ Selection (Uneven-aged harvest)	Regeneration* (Even-aged harvest)	Thinning (Intermediate harvest)	Sanitation/ Salvage (Intermediate harvest)	Pre-commercial Thinning (Intermediate treatment)	Prescribed Fire
Mixed Conifer	12	44	0	109	33	0
Engelmann Spruce	7	1	0	17	0	0
Lodgepole Pine	0	88	26	132	88	0
Douglas-Fir	10	5	0	18	0	0
Ponderosa Pine	104	1	0	53	65	739
Persistent Aspen	0	2	0	0	0	6
Woodland	0	0	0	0	0	0
Total**	133	140	26	331	185	746

Regeneration harvest treatment includes clearcuts, shelterwoods, shelterwood removal, and seedtree methods.
** Totals may not add up due to rounding.

Table B-21. Alternative D—Projected Forestwide Vegetation Management Practices (Annual Average Acres First Decade)

Forest Cover Types	Improvement/ Selection (Uneven-aged harvest)	Regeneration* (Even-aged harvest)	Thinning (Intermediate harvest)	Sanitation/ Salvage (Intermediate harvest)	Pre-commercial Thinning (Intermediate treatment)	Prescribed Fire
Mixed Conifer	17	60	0	192	45	17
Engelmann Spruce	0	3	0	30	0	0
Lodgepole Pine	0	111	33	182	444	6
Douglas-Fir	10	5	0	33	0	12
Ponderosa Pine	210	1	0	80	131	822
Persistent Aspen	0	2	0	0	0	28
Woodland	0	0	0	0	0	0
Total**	237	183	34	517	620	884

Regeneration harvest treatment includes clearcuts, shelterwoods, shelterwood removal, and seedtree methods.
** Totals may not add up due to rounding.

Table B-22. Alternative D—Projected Forestwide Vegetation Management Practices (Annual Average Acres Second Decade)

Forest Cover Types	Improvement/ Selection (Uneven-aged harvest)	Regeneration* (Even-aged harvest)	Thinning (Intermediate harvest)	Sanitation/ Salvage (Intermediate harvest)	Pre-commercial Thinning (Intermediate treatment)	Prescribed Fire
Mixed Conifer	17	60	0	192	45	17
Engelmann Spruce	10	2	0	30	0	0
Lodgepole Pine	0	111	33	182	111	6
Douglas-Fir	10	5	0	33	0	12
Ponderosa Pine	210	1	0	80	131	822
Persistent Aspen	0	2	0	0	0	28
Woodland	0	0	0	0	0	0
Total**	247	181	34	517	288	884

Regeneration harvest treatment includes clearcuts, shelterwoods, shelterwood removal, and seedtree methods.
** Totals may not add up due to rounding.

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Appendix C

At-Risk Species

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FEIS Appendix C Errata Sheet

Background

The Assessment At-Risk Species report, published in May 2017, was incorporated, in large part, into the DEIS as appendix C. However, there have been changes in species status since the time the Assessment At-Risk Species report was published, as well as updated information of species habitat occurrence. The Assessment At-Risk Species report is not being updated as part of the forest plan revision process. This errata sheet addresses technical errors and updated information, some of which were brought up in comments on the draft EIS. Refer to Appendix H. Response to Comments for responses to the comments on Appendix C. At-risk species are addressed in full in the final EIS, Appendix D. Persistence Analysis for At-Risk Species and Plan Component Crosswalks for At-Risk Species, Pollinators, Habitat Types, and Aquatics.

Errata

The Regional Forester's letter identifying species of conservation concern was transmitted December 2017, at which time the Eureka mountainsnail was identified as a species of conservation concern. Refer to Appendix D (Persistence Analysis) and the Intermountain Region website for additional information on Species of Conservation Concern in Forest Planning.[1] The status of wolverine is now "proposed" for federal listing, and the US Fish & Wildlife Service and the Ashley National Forest have determined that typical habitat for the yellow-billed cuckoo does not occur on the Ashley National Forest.[2] Refer to the Biological Assessment and Appendix D (Persistence Analysis). Terminology in the state status column of Table C-2 of Appendix C is incorrect. The term "species of concern" should be "species of greatest conservation need" instead. A few changes in state status have also occurred for a few plant species as well as bighorn sheep. Refer to the states of Utah and Wyoming for the correct state species status.

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[1] Access the Intermountain Region Species of Conservation Concern in Forest Planning: https://www.fs.usda.gov/detail/r4/landmanagement/planning/?cid=fseprd944994

[2] Refer to the Biological Assessment for the Ashley National Forest Land and Resource Management Plan, January 2023

Appendix C. At-Risk Species

Introduction

Part of revising the National Forest management plan is to identify federally protected, threatened, endangered, proposed, and candidate species that reside in or have suitable habitats on the Ashley National Forest. The Forest Service responsibility for threatened and endangered species is to work with the U.S. Fish and Wildlife Service and other partners such as state wildlife agencies, to help in the recovery of these species. Similarly, the primary goal for proposed species is to conserve them and their habitat so that Forest Service management actions do not threaten these species in the recovery process. The list of species is determined and maintained by regional Fish and Wildlife Service offices. For the Ashley National Forest, these lists are managed by the Ecological Services office in Salt Lake City, Utah.

In addition to the federally protected species, the Forest Service identifies species of conservation concern. These are typically species that may have smaller numbers or have been trending downward. Therefore, the agency ensures management actions do not impact these species or their habitat, and that viable populations are maintained.

The 2012 Planning Rule defines species of conservation concern as: a species, other than federally recognized as threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area. Substantial concern being defined as some combination of threats either directly to the species or indirectly to the species habitat, their pollinators, or other relevant risk factors." 'Persistence over the long term of planning area' must be thought of as 'continued existence' and needs to be thought of in ecological time. That being the time for the species to disperse, compete, and reproduce on to the longer end of forest succession. So persistence is longer than the 15-year forest planning cycle."

The original list of species of conservation concern considered were generated by the Forest Service's Intermountain Regional Office. This consisted of 96 animal and 81 plant species as potential species of conservation concern for the Ashley National Forest. The following key criteria or questions were considered in the evaluation of species of conservation concern.

- Is the species native to the Ashley 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 Forest?
- Are the species occurrences accidental or transient on the Ashley?
- Is the species established or becoming established on the Ashley?
- What is the distribution, abundance, and trend of the species on the Ashley?
- What threats and risks does the species face on the Ashley?
- What habitat requirement does the species have?
- Is there substantial concern for this species to persist on the Ashley?

Information Sources and Gaps

The Ashley National Forest uses a number of sources to determine National Forest distribution and occurrences. These include Forest Service corporate database, Natural Resource Manager (NRM), NatureServe, Utah Natural Heritage Database, Wyoming Natural Heritage Database, Rocky Mountain Herbarium, Brigham Young University Herbarium, University of Colorado Herbarium, Utah State University – Uintah Basin Herbarium, and Natural Resource Conservation Service (NRCS) Plants Database. Other sources of information were also used such as state level species reports/ Wildlife Action Plans, Birds of North America, A Utah Flora, Uinta Flora, Flora of Wyoming, Intermountain Flora, Flora of North America, and other available information.

Many of the animal species the Forest considered were NatureServe ranks of S1 (critically imperiled) or S2 (imperiled) in Wyoming, or in other words, relatively rare species. That part of the Ashley National Forest, which is located in Wyoming, is limited to the Flaming Gorge National Recreation Area. This popular recreation area is relatively limited in terms of its habitat diversity. Therefore, most of the S1/2 animal species in Wyoming were not recommended for potential species of conservation concern because the Flaming Gorge National Recreation Area does not support the specific species habitat requirements. For more details about any of the species considered as potential species of conservation concern, visit the NatureServe website at http://explorer.natureserve.org/.

Threats, risks, and habitat requirements for each species were identified using many of the sources listed above. Species distribution maps in NatureServe, NRCS Plants Database, corporate knowledge and data, plant identification manuals, and plant specimens in herbariums were used to determine if the species was native, as well as if the species is established or becoming established on the Forest.

Abundance and trend for many animal species were difficult to assess because of a lack of information. Animal species were not carried forward if the planning area had few (less than 10) to no occurrences and the species was secure in adjacent states within the species core distribution or primary home range. For species occurrence information, we considered data from both Wyoming and Utah wildlife databases and Forest Service corporate databases. For plant species, abundance and trend data were sufficient to assess all species. Additional criteria were also considered for the plant species assessment. These included:

- margin of range (wide-ranging plant species with limited distribution on the forest)
- contrasting taxonomic treatments (disagreement in distinguishing different types of plants)
- species reaction to disturbance
- existing laws and designations that provide protection
- level of taxonomic (taxonomic?) status

Scale of Analysis

With the primary purpose of this assessment being to assist in revising our Ashley National Forest management plan, we focused our analysis area primarily on the Ashley National Forest. The Ashley National Forest lies within the Duchesne and Upper Green River 4th order hydrologic units. We did consider species distributions in areas adjacent to the Ashley National Forest, as well as regional and global distributions of species. Moreover, we also related species distribution to Ashley National Forest land type associations to better understand and define the relationship between species and their habitat needs.

Table C-1 is a summary of the endangered, threatened, proposed, or candidate species that occur or have suitable habitat on the Ashley National Forest. These species are covered by the Endangered Species Act of 1973, and the Ashley National Forest is mandated to consider potential effects from management to these species. While the Ashley does not have discretion or control of this list, these species are still part of the species at risk assessment for forest plan revision.

Table C-2 presents the list of Regional Forester identified species of conservation concern for the Ashley National Forest.

Table C-3 lists current habitat conditions, trends, and risk factors for threatened, endangered, proposed, and candidate animal and plant species.

Table C-4 lists current habitat conditions, trends, and risk factors for Regional Forester identified species of conservation concern.

Table C-1. Federally Listed Threatened, Endangered, Proposed, or Candidate Animal and Plant Species Identified in the USFWS IPaC List

Scientific Name/ Common Name	Federal Listing Status	Habitat/Landtype Association (LTA)	Observation Information
Mammals			
Lynx canadensis Canada lynx	Threatened	Forested areas, including Engelmann spruce, subalpine fir, lodgepole pine, Douglas-fir, and aspen. Areas of dense understory cover and/or thickets of young trees and mature forests with large amounts of coarse, woody debris. Habitat occurs in the following LTAs: Greendale Plateau, Parks Plateau, Trout Slope, Alpine Moraine, Dry Moraine, Glacial Bottom, North Flank, Round Park, Stream Canyon, Stream Pediment, Wolf Plateau, Avintaquin Canyon, Strawberry Highlands, Glacial Canyon, Limestone Plateau, and South Face.	There are 10 lynx specimens that have been reliably traced to the Uinta Mountains, with collection dates ranging from 1916 to 1972. Between February 1999 and March 2007, 22 lynx from the experimental release in Colorado have been located at least once in Utah. Use density of these locations indicates the primary area of use was in the Uinta Mountains. The majority of use was on the Uinta-Wasatch-Cache National Forest and to a somewhat lesser degree on the Ashley National Forest. All these individual lynx were transient and did not take up residency in the Uinta Mountains. The Ashley National Forest is unoccupied and considered peripheral habitat (Interagency Lynx Biology Team 2013).
Birds			
Strix occidentalis lucida Mexican spotted owl	Threatened	Steep to vertical walled canyons that are greater than 1.2 miles long and less than 1.2 miles wide, and contain pockets of coniferous overstory trees mixed with smaller Gambel oak and box elder trees. Habitat occurs in the Stream Canyon and Glacial Canyon LTAs.	Surveys have been conducted in suitable habitat on the Ashley National Forest; however, there are no records of occurrence on the forest. The species does not exist on the Ashley National Forest.
Coccyzus americanus Yellow-billed cuckoo	Threatened	Nests in lowland riparian habitats (typically in large habitat patches [greater than 200 acres] of cottonwood/willow habitats] with dense understory vegetation of willow and a high foliage volume of cottonwood. Usually within 328 feet of water. Marginal habitat occurs in the Stream Canyon, Glacial Canyon, and Glacial Bottom LTAs.	Surveys have been conducted in suitable habitat on the Ashley National Forest; however, there are no records of occurrence on the forest. The species does not exist on the Ashley National Forest.
Fish			
Gila cypha Humpback chub*	Endangered	Variety of habitats; desert riverine systems usually associated with swift and turbid water. No suitable habitat on the Ashley National Forest.	The species does not exist on the Ashley National Forest.
Gila elegans Bonytail chub*	Endangered	Typically associated with mainstem desert riverine systems; found in the backwaters on these rivers.	The species does not exist on the Ashley National Forest.

Scientific Name/ Common Name	Federal Listing Status	Habitat/Landtype Association (LTA)	Observation Information
Ptychochelius lucius Colorado pikeminnow*	Endangered	Wide variety of habitats (pools, riffles, and runs) associated with larger desert riverine systems.	The species does not exist on the Ashley National Forest.
Xyrauchen texanus Razorback sucker*	Endangered	Typically associated with mainstem desert riverine systems; typically found in slow-water habitats (backwaters and pools) on these rivers.	The species does not exist on the Ashley National Forest.
Plants			
Lepidium barnebyanum Barneby ridge-cress	Endangered	Found on ridge crests of white shale outcrops in the Uinta and Green River formations at 5,900–6,600 feet in the Indian Canyon drainage.	The species does not exist on the Ashley National Forest.
Phacelia argillacea Clay phacelia	Endangered	Grows on fragile, barren soils on steep hillsides only in Spanish Fork Canyon, Utah.	The species does not exist on the Ashley National Forest.
Spiranthes diluvialis Ute ladies'-tresses	Threatened	Floodplains, streams, and other riparian habitat. Habitat occurs in the Red Canyon LTA.	Four occurrences within the plan area; along the Green River between Little Hole and the Ashley National Forest boundary. Known from below the national forest boundary along the Green, Yellowstone, Uinta, Lake Fork, and Rock Creek Rivers. Most occurrences are small, having less than 1,000 plants and occupying less than 50 acres (Franklin 1992).

*These species are analyzed for downstream effects from water-depletion-related projects.

Table C-2. Regional Forester Identified Wildlife, Fish, and Plant Species of Conservation Concern Located on the Ashley National Forest

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Birds							
Centrocercus urophasianus Greater sage-grouse	Declining populations and habitat rangewide. Ecological disturbances (climate change, drought, and in some instances predation) and anthropogenic disturbances continue to be a threat to greater sage-grouse and their habitat on the Ashley National Forest.	Sensitive	Species of concern	G3 Utah – S3 Wyoming – S4	Sagebrush and grassland habitat. Habitat is found within the Anthro Plateau, Antelope Flat, Parks Plateau, South Face, Glacial Canyon, Stream Pediment, Avintaquin Canyon, Strawberry Highlands, and Structural Grain LTAs.	Composition and Distribution of Vegetation: Greater sage-grouse habitat is defined in large part by the type of vegetation (sagebrush and grassland) and its distribution on the landscape. Structure Stages of Vegetation: Breeding, nesting, brood rearing, and wintering habitats are defined by the structure stages of vegetation. Patch Size: The size and quantity of habitat patches likely define the quality and quantity of habitat across the landscape. Connectivity of habitats may also be important to greater sage-grouse. Disturbances: Habitat disturbance, such as catastrophic fire and noxious weed infestations, can affect the habitat patch size and quality of sage-grouse habitat on the landscape.	Numerous observations on the Ashley National Forest.

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Falco peregrinus Peregrine falcon	Rangewide, the species is either imperiled or vulnerable. Thus, threats (riparian degradation and noise disturbance to nesting) on the Ashley National Forest may have the potential to affect the species.	Sensitive	No special status	G4 Utah – S3B Wyoming – S2	Riparian habitats that are associated with cliffs. Habitat is found within the Stream Canyon, Glacial Canyon, Red Canyon, and North Flank LTAs.	Composition and Distribution of Vegetation: Peregrine falcon habitat is defined in large part by the type of vegetation (riparian) and its association with nesting habitat (cliffs) on the landscape. Structure Stages of Vegetation: Prey species habitats are defined by the structure stages of vegetation. Patch Size: The size and quantity of foraging habitat patches in relation to cliffs likely define the quality and quantity of habitat across the landscape. Disturbances: Habitat disturbance, such as catastrophic fire and beetle epidemics, can affect the habitat patch size and quality of peregrine falcon habitat on the landscape.	Numerous observations from the few known eyries on the Ashley National Forest.

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Leucosticte atrata Black rosy-finch	This species is critically imperiled in Utah and Wyoming, and imperiled or vulnerable in surrounding states where its core distribution occurs.	No Forest Service status	No special status on the Utah Partners In Flight priority species list	G4 Utah – S1 Wyoming – S1B, S2N	Barren, rocky, or grassy areas and cliffs among glaciers and receding snow banks, or beyond timberline. Habitat is found within the Uinta Bollie and Alpine Moraine LTAs.	Composition and Distribution of Vegetation: Black-rosy finch habitat is defined in large part by the type of vegetation (grassy areas in alpine) and its distribution in relation to snowfields and rock. Structure Stages of Vegetation: Prey species (insects) could be defined by the structure stages of vegetation (grass and forbs). Patch Size: The size and quantity of habitat patches likely define the quality and quantity of habitat across the landscape. Connectivity between habitat patches may also be important for this species.	There are 85 known occurrences on the Ashley National Forest within the last 20 years. Occurrences are at high elevations in the associated LTAs.

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Mammals							
Sylvilagus idahoensis Pygmy rabbit	The only known locations of this species on the Ashley National Forest are in the Wyoming portion of the Flaming Gorge National Recreation Area (FGNRA). This species is critically imperiled in Wyoming and either imperiled or vulnerable in the surrounding states where its core distribution occurs.	Sensitive	Species of concern	G4 Utah – S3 Wyoming – S2	Dense stands of big sagebrush growing in deep, loose soils. Habitat and occurrence are within the Green River LTA.	Composition and Distribution of Vegetation: Pygmy rabbit habitat is defined in large part by the type of vegetation (sagebrush and grassland) and its distribution on the landscape. Structure Stages of Vegetation: The quality of habitat is defined by the density and structure stage of big sagebrush. Patch Size: The size and quantity of habitat patches likely define the quality and quantity of habitat across the landscape. Connectivity of these habitat patches may be important to population expansion. Disturbances: Habitat disturbance, including catastrophic fire, can affect the habitat patch size and quality of pygmy rabbit habitat on the landscape.	There are nine known occurrences on the Ashley National Forest within the last 20 years. These occurrences have been in the FGNRA.

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Myotis thysanodes Fringed myotis (bat)	This species is imperiled in Utah and Wyoming, and imperiled or vulnerable in surrounding states where its core distribution occurs.	No Forest Service status	Species of concern	G4 Utah – S3 Wyoming – S2, S3B	Middle elevations in desert, riparian, grassland, and woodland habitats. Habitat is found within the Anthro Plateau, Avintaquin Canyon, Strawberry Highlands, Green River, Antelope Flat, North Flank, South Face, Stream Canyon, Glacial Bottom, Glacial Canyon, Stream Pediment, Structural Grain, Wolf Plateau, Parks Plateau, Moenkopi Hills, Limestone Hills, Dry Moraine, Greendale Plateau, and Red Canyon LTAs.	Composition and Distribution of Vegetation: In part, fringed myotis habitat is defined by the type of vegetation (riparian, grassland, and woodland) and its distribution on the landscape. Structure Stages of Vegetation: Roosting can be defined by the availability of larger trees that provide crevices or cavities for roosting. Patch Size: The size and quantity of habitat patches likely define the quality and quantity of habitat across the landscape. Disturbances: This species is likely sensitive to disturbances to their hibernacula and maternity habitat (caves). Other Key Elements: The availability of caves (for hibernacula and maternity colonies) on the landscape is key for the sustainability of this species on the landscape.	There are eight known occurrences on the Ashley National Forest within the last 20 years.

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Ovis canadensis Bighorn sheep	Recent declines in both populations on the Ashley National Forest, primarily due to disease. Ecological disturbances such as conifer encroachment impacting habitat. Predation from mountain lion is a secondary concern.	Sensitive	Species of greatest concern need	G4 Utah – S3? Wyoming – S2, S3	Steep, open habitat types with adjacent rocky areas. This species uses habitat found within the Anthro Plateau, Avintaquin Canyon, Uinta Bollie, Alpine Moraine, North Flank, Greendale Plateau, Red Canyon, and Structural Grain LTAs.	Composition and Distribution of Vegetation: Bighorn sheep prefer open habitat types (high alpine to lower grasslands) with adjacent steep, rocky areas for escape and safety. Habitat is characterized by rugged terrain, including canyons, gulches, talus cliffs, steep slopes, mountaintops, and river benches. Structure Stages of Vegetation: Habitat is associated with early vegetation seral stages and steep slopes. Patch Size: The size and quantity of habitat patches likely define the quality and quantity of habitat across the landscape. Connectivity of habitats may also be important to bighorn sheep. Disturbances: Habitat disturbance, such as wildfire, typically improves bighorn sheep habitat. Other disturbances include conifer encroachment and potential cheatgrass invasion.	Numerous observations: five herds in the Uintas Mountains and one on the South Unit make up the population on the Ashley National Forest.

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Fish							
Oncorynchus clarki plueriticus Colorado River cutthroat trout	Without past, current, and ongoing conservation efforts, this species' persistence on the Ashley National Forest is at risk primarily due the presence of nonnative trout.	Sensitive	Conservation agreement species	G4/T3 Utah – S3 Wyoming – S1	Requires cool, clear water and well-vegetated streambanks for cover and bank stability. Habitat is found in various LTAs, including Stream Canyon, Glacial Bottom, Strawberry Highlands, Avintaquin Canyon, Greendale Plateau, and Round Park.	Composition: Instream cover in the form of deep pools, boulders, and logs is important. The species needs spawning gravels free of fine sediment to complete its life cycle. Adapted to relatively cold water; thrives at high elevations. Disturbances: Primarily any sediment-causing activities, such as overgrazing, severe fire, logging, and ATV use. The presence of nonnative species often results in hybridization with Colorado River cutthroat trout and also competition for resources.	Populations exist across the Ashley National Forest.

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Plants							
Antennaria pulcherrima Handsome pussytoes	Habitat is geographically restricted and rare within the plan area. Two occurrences have been documented within the plan area (Huber 2016).	None	Peripheral	G5 Utah – S1 Wyoming – S2	Intermediate to rich fens and wet meadows. Alpine Moraine LTA.	Rich or calcareous fens meet the definition of a rare and specialized habitat in the forest plan assessment. Geologically, these are restricted to wetlands underlain by limestone or fed by calcium-rich water, or both. Such fens are rare within the plan area and provide habitat for rare plant species. Rich fen habitat is identified in part by vegetation composition, which includes a number of calcicolous wetland plants. Hummocks, peatlands, and other fen features provide unique niches for plants and create a patchwork of plant communities.	Twelve collections documented from the Uinta Mountains with five collections located within the plan area. The last documented observation was in 2016 (Huber 2016). Localized and relatively common within its known habitat. Monitoring of fens and meadows indicates satisfactory conditions of the plant's habitat, indicating stable population trends and persistence (Huber 2016).
Aquilegia grahamii Graham's columbine	Narrow endemic; three occurrences have been documented within the plan area (Huber 2016).	Sensitive	Rare	G2 Utah – S2 Wyoming – None	Deep, stream-cut canyons; in cliff cracks, on ledges, in seeps or hanging gardens of the Pennsylvanian-Permian Weber Sandstone (Goodrich 2013a). Stream Canyon LTA.	The plant is restricted to a narrow habitat, which limits its distribution in the plan area. Habitat within the plan area is well protected and undisturbed due to its vertical topography and relative inaccessibility.	The latest available estimates of overall population size are 5,000 to 10,000 plants from 11 specific sites. The population trend appears stable and persisting within the plan area (Huber 2016).

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Cirsium ownbeyi Ownbey's thistle	Regional endemic; two occurrences have been documented within the plan area (Huber 2016).	None	Watch, species of concern	G3 Utah – S1 Wyoming – S2	Sagebrush and desert shrub communities. Green River LTA.	The plant communities in which this plant grows are common and widespread within the plan area, but its distribution is limited therein. Core populations occur in northwestern Colorado. The plant is known to colonize both natural and human-made ground disturbances, such as landslides and road cuts. Habitat may be susceptible to annual invasive plants, such as cheatgrass. The presence of annual invasive plants could alter natural fire intervals.	Two collections, last documented in 1995, occur within the plan area in the FGNRA. Based on 11 collections documented for Wyoming, the state population was estimated between 56,000 and 75,000 plants (Huber 2016).
Cymopterus evertii Evert's wafer parsnip	Regional endemic; one occurrence has been documented within the plan area (Huber 2016).	None	Rare, species of concern	G3 Utah – S1 Wyoming – S2	Grows in limestone gravels along the rim of Ashley Gorge; associated with Douglas-fir and limber pine (Goodrich 2013b). Stream Canyon LTA.	The plant community in which this plant grows is common and widespread; however, required habitat appears restricted, and distribution is limited to one population. If conifer increases in density and canopy cover, it would reduce the quality of habitat and diminish plant populations. The potential of fire may increase from this trend (Huber 2016).	One occurrence is documented in Uintah County, Utah, and is a disjunct population. It is only found along the rim of Ashley Gorge within the plan area. Two collections have been made; it was last documented in 2006 (Huber 2016).

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Cypripedium fasciculatum Clustered lady's slipper	Known populations consist of few plants. Timber harvest, bark beetle infestations, and fire are stressors (Huber 2016). Listed as sensitive in Utah.	Sensitive	Rare, species of potential concern	G4 Utah – S1 Wyoming – S3	Shade of coniferous forests between 8,000 and 9,000 feet. In duff of moderately dense to dense lodgepole pine forests where understory species are sparse (Goodrich 2013c). Parks Plateau and Trout Slope LTAs.	Lodgepole pine is a common vegetation community in the eastern Uinta Mountains. Quality habitat is widespread, and the range of the plant and its habitat extends over 25 miles. Fire, bark beetle epidemics, and timber harvest have temporarily reduced habitat and diminished populations, but these disturbances have not eradicated the plant. Current timber management practices implement strategies to conserve existing habitat and populations (Huber 2016).	About 30 known occurrences in the plan area. Most populations consist of a few plants (1–100) (Franklin 1990a).
Draba brachystylis Wasatch draba	Regional endemic; one occurrence has been documented within the plan area (Huber 2016).	None	Rare	G1 Utah – S1 Wyoming – None	Found in limestone rocks, talus, or scree within the plan area. Outside the plan area, it also is found in coniferous or aspen forests. Glacial Canyon LTA.	The plant is restricted to a narrow habitat, which limits its distribution within the plan area. The population is considered disconnected with the core population occurring westward in the Wasatch Mountains. Habitat within the plan area is well protected and undisturbed due to its rocky topography and relative inaccessibility.	One collection from the plan area has been made; it was last observed in 1983 (Huber 2016).

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Draba globosa Rockcress draba	Listed as sensitive in Utah	Sensitive	Rare, species of concern	G3 Utah – S2 Wyoming – S2	Alpine tundra, most often associated with or adjacent to persisting snow beds. Uinta Bollie LTA.	Quality alpine habitat is abundant and widespread for this plant. Collections demonstrate a distribution across the entire alpine range of the Uinta Mountains for a distance of about 60 miles. Most populations appear to be small but widespread. Large populations are apparently infrequent (Huber 2016; Goodrich 2013d). The plant is commonly found in disturbed, open ground caused by melting snow beds.	Widely distributed across the alpine crest of the Uinta Mountains, but often in small populations. Ten new occurrences in the plan area over the last 20 years on the Ashley National Forest; it was last documented in 2016. There are 37 collections from the Uinta Mountains. The population trend appears stable and persisting, and habitat is relatively resilient (Huber 2016).
Draba ventosa Tundra draba	Rare and often disconnected throughout its distribution; four collections from the Uinta Mountains with one from the plan area (Huber 2016).	None	Watch	G3 Utah – S1 Wyoming – S3	Alpine. Occurs in talus, scree slopes, slides, and fell-fields; on cliffs and at the base of cliffs; on ridges; and on summits. Often, but not always, found on limestone parent material. Uinta Bollie LTA.	Habitat for the plant is relatively abundant, widespread, and undisturbed, but populations appear rare and scattered. Most occurrences in the Uinta Mountains are found outside the plan area (Huber 2016). Plant habitat is relatively remote, rugged, and inaccessible to humans and their impacts.	One occurrence has been documented within the plan area. Utah is the edge of the plant's distribution, but the plant is rare throughout its entire distribution (Huber 2016).

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Erigeron untermannii Untermann's daisy	State endemic. Habitat is found within and adjacent to energy-rich areas, which pose a potential threat (Huber 2016).	Sensitive	Rare	G2 Utah – S2 Wyoming – None	Semi-barrens of sandstone, shale, and siltstone of the Uinta and Green River Formations. Windswept, sparsely vegetated ridge tops within pinyon-juniper, Douglas-fir, and limber pine-bristle cone pine belts. Anthro Plateau LTA.	Patch sizes of this plant's habitat are typically small (less than 10 acres), but are relatively common and well distributed across the Tavaputs Plateau of the plan area, where core populations occur (Franklin 1989; Huber 2016; Goodrich 2013e). Habitat features minimize most human-related stressors such as grazing and mineral extraction.	Eleven occurrences have been documented over the last 20 years with the last occurrence in 2011. Thirty-one collections have been documented from the Uinta Basin. Monitoring indicates that populations are stable and persisting (Huber 2016).
Kobresia simpliciuscula Compound Kobresia	Rare habitat in the plan area with four documented occurrences (Huber 2016).	None in Utah or Wyoming	Peripheral species of concern	G5 Utah – S1 Wyoming – S1	Rare calcareous or rich fens. Alpine Moraine and Greendale Plateau LTAs.	Rich or calcareous fens meet the definition of a rare and specialized habitat in the forest plan assessment. Geologically, these are restricted to wetlands underlain by limestone or fed by calcium-rich water, or both. Such fens are rare within the plan area and provide habitat for rare plant species. Rich fen habitat is identified in part by vegetation composition, which includes a number of calcicolous wetland plants. Hummocks, peatlands, and other fen features provide unique niches for plants and create a patchwork of plant communities.	Utah is at the southern edge of its range. Eight collections have been documented from the Uinta Mountains. It was last observed in 2016. Monitoring indicates that the fen is in satisfactory condition with stable trends (Huber 2016).

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Lepidium huberi Huber's pepperplant	Local endemic; four occurrences have been documented within the plan area (Huber 2016).	None	Rare	G2 Utah – S2 Wyoming – None	Eroding slopes and narrow, steep canyons of the Moenkopi Formation; with mountain brush and ponderosa pine; canyon breaks. Moenkopi Hills and Stream Canyon LTAs.	Although the plant communities in which the plant grows are abundant and widespread, quality habitat is uncommon with a restricted distribution within the plan area. Habitat is more common outside the plan area with core populations found on the East Tavaputs Plateau (Huber 2016; Goodrich 2013f). Habitat features minimize stressors such as grazing, fire, recreation, and mineral extraction.	Ten collections have been documented for Utah. It is locally abundant and relatively widespread. Populations of the plant in the plan area are stable and persistent (Huber 2016).
Mentzelia goodrichii Goodrich's blazingstar	Narrow endemic; two occurrences have been documented within the plan area (Huber 2016).	Sensitive	Rare	G1 Utah – S1 Wyoming – None	Grows on escarpments, eroding slopes, and semi-barrens of the Green River Formation. Occasionally in association with pinyon, juniper, and Douglas-fir. Anthro Plateau LTA.	The plant communities in which the plant grows are abundant and widespread, but eroding slopes and semi-barrens of the Green River and Uinta Formations provide the best habitat. Although these features are relatively common and widespread across the West Tavaputs Plateau, populations are uncommon and scattered (Goodrich 2008; Huber 2016). Habitat features minimize stressors such as grazing, fire, recreation, and mineral extraction.	Nine collections have been documented for Utah. Plants are scattered in small populations. Most are found outside the plan area. Populations appear to be stable and persisting (Huber 2016).

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Oxytropis besseyi var. *obnapiformis* Maybell locoweed	Regional endemic; one occurrence has been documented in the plan area (Huber 2016).	None	Watch, species of concern	G5/T2 Utah – S2 Wyoming – S1	Pinyon-juniper and sagebrush communities, often on semi-barrens in either fine-textured or sandy substrates. North Flank LTA.	The plant communities in which this plant grows are common and widespread within the plan area, but the plant's distribution is limited therein (Huber 2016). Habitat may be susceptible to annual invasive plants, such as cheatgrass; the presence of annual invasive plants could alter natural fire intervals.	The core population is located in Colorado; nine collections have been documented for Utah and five for Wyoming. Only one collection was from the plan area. The trend is unknown, but at least Wyoming populations appeared stable (Huber 2016).
Papaver radicatum var. *kluanense* Alpine poppy	Small populations restricted to a narrow habitat (Huber 2016)	Sensitive	Species of concern	G5/T4 Utah – S1 Wyoming – S2	Restricted to a narrow habitat, which consists of Red Pine Shale talus slopes and ridge tops. Uinta Bollie LTA.	Although uncommon, habitat for this plant is widespread with populations scattered across the crest of the Uinta Mountain range. Its range extends approximately 50 miles (Franklin 1990b; Huber 2016; Goodrich 2013g). Plant habitat is almost entirely undisturbed by humans and their impacts due to its remote, rugged, and inaccessible terrain.	Populations generally cover small areas and are comprised of few to a few hundred plants. Fourteen documented occurrences have been within the plan area. Populations appear stable, and persistence is expected (Franklin 1990b; Huber 2016).

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Penstemon acaulis Stemless beardtongue	Local endemic	Sensitive	Peripheral species of concern	G2 Utah – S1 Wyoming – S1	Mixed-desert shrub, black sagebrush, Wyoming big sagebrush, and pinyon-juniper communities. North Flank and Antelope Flat LTAs.	The plant communities in which this plant grows are abundant and widespread within the plan area, but the plant's range and distribution are quite narrow and limited. Core populations occur outside the plan area in southwestern Wyoming. Plants appear to benefit from both natural and human-related surface disturbances. Habitat may be susceptible to annual invasive plants, such as cheatgrass. The presence of annual invasive plants could alter natural fire intervals (Huber 2016; Jouseau 2012; Goodrich 2013h).	Over 10 occurrences have been documented over the last 20 years. There are larger populations outside the plan area than within the plan area. Monitoring found that the species colonizes on disturbance such as road sides, burrow areas, two-track roads, and bladings. The density and size of plants on this disturbance are equal to or greater than those of plants in undisturbed habitat (Goodrich 2013h; Huber 2016).
Phacelia glandulosa var. *deserta* Desert phacelia	Local endemic. Limited populations; two occurrences within the plan area (Huber 2016).	None	Species of concern	G4/T2 Utah – None Wyoming – S2	Desert shrub and Wyoming big sagebrush. Green River LTA.	The plant communities in which this plant grows are abundant and widespread within the plan area, but the plant's distribution is limited therein. Core populations occur outside the plan area in Wyoming. Habitat may be susceptible to annual invasive plants, such as cheatgrass. The presence of annual invasive plants could alter natural fire intervals (Huber 2016).	Populations vary from small (less than 10 plants) to locally abundant (4,000–6,000 individuals), with total numbers estimated between 20,000 and 25,000 plants. It is not found in Utah. There have been 6 to 20 occurrences outside the plan area (Huber 2016).

Scientific Name/ Common Name	Rationale	Forest Service Status	State Status	Global and State Ranks*	Habitat/ Landtype Association	Habitat Factors/Key Ecosystem Characteristics	Observation Information
Primula incana Silvery primrose	Rare habitat in the plan area with one occurrence documented (Huber 2016)	None	Peripheral	G5 Utah – S1 Wyoming – S2	Rare calcareous or rich fens. Greendale Plateau LTA.	Rich or calcareous fens are restricted to wetlands underlain by limestone or fed by calcium-rich water, or both. Such fens are rare within the plan area and provide habitat for rare plant species. Rich fen habitat is identified in part by vegetation composition, which includes a number of calcicolous wetland plants. Hummocks, peatlands, and other fen features provide unique niches for plants and create a patchwork of plant communities (Huber 2016).	Utah is at the southern edge of its range. Two collections have been documented from the Uinta Mountains. It was last observed in 2016. Monitoring indicates the fen is in satisfactory condition with stable trends (Huber 2016).

*Global Rankings: G1—critically imperiled; G2—imperiled; G3—vulnerable; G4—apparently secure; G5—secure. State Rankings: S1—critically imperiled; S2—imperiled; S3—vulnerable; S4—apparently secure; S5—secure; use of "T" rank indicates a taxon for which there is a trinomial (a subspecies, variety, or recognized race); use of "B" indicates the conservation status refers to the breeding population of the species; use of "N" indicates the conservation status refers to the non-breeding population of the species (NatureServe 2020).

Table C-3. Current Habitat Conditions, Trends, and Risk Factors for Threatened, Endangered, Proposed, and Candidate Animal and Plant Species

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Lynx canadensis Canada lynx	Beetles have affected conifers in all LTAs (associated with this species habitats). This has reduced some foraging habitat, but it has increased the potential for future foraging and denning habitat. Some regeneration is occurring. Aspen stands are generally in satisfactory condition with some areas of conifer encroachment.	Climate change may increase the threat of stand-replacing fire and the distribution of spruce and fir forests. Spruce and pine beetle outbreaks in associated LTAs may continue to affect this habitat.	Fragmentation, loss, or degradation of habitat through activities such as commercial timber harvest, road building, and snow compacting activities.	A large portion of this species' habitat on the Ashley National Forest is remote and receives little human-related impacts; thus, it is likely to persist over time in the absence of ecological stressors. The beetle epidemic has decreased some lynx habitat. However, habitat sustainability for this species is likely to persist as the conifer stands affected by the beetle epidemic regenerate over time. As this occurs, foraging habitat (young regenerating conifer stands) is likely to increase, as is denning habitat (snags falling to the forest floor over time).
Strix occidentalis lucida Mexican spotted owl	Breeding and nesting habitat for this species is unlikely to occur on the Ashley National Forest. Few canyons on the Ashley National Forest, if any at all, meet the 2x2 rule (less than 1.24 miles wide and greater than 1.24 miles long; this is the typical canyon characteristic for breeding and nesting). However, the Ashley National Forest contains larger canyons that contain other habitat components (conifer stands). Conifer stands in associated LTAs have been affected by beetles. This has reduced some habitat, but some regeneration is occurring.	Climate change that leads to stand-replacing wildfire threatens habitat. Spruce and pine beetle outbreaks in associated LTAs may continue to affect this habitat.	Overgrazing and commercial timber harvest are considered threats, but there is minimal timber harvest that occurs on the Ashley National Forest.	Habitat for this species is limited and may not occur on the Ashley National Forest, as very few canyons, if any at all, meet the 2X2 rule. However, some elements of this species' habitat are likely to remain sustainable over time. This is because there are few, if any, threats to this habitat. Other elements of this species' nesting habitat (conifers) may decrease as the beetle epidemic persists. However, it is likely to improve over time as regeneration occurs within those conifers stands affected by the beetle epidemic.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Coccyzus americanus Yellow-billed cuckoo	The Ashley National Forest likely does not contain the expansive cottonwood habitats required for this species. However, some smaller cottonwood habitat patches/stringers do occur. With a few exceptions, riparian habitats in LTAs associated with this species' habitat, including cottonwood stands, are generally in satisfactory condition. These few exceptions are trending toward satisfactory condition.	Climate change could reduce the amount of riparian and cottonwood forests.	Loss or degradation of riparian and cottonwood habitat, including disruption of streamflows.	The Ashley National Forest does not contain, and is unlikely to ever contain, the expansive cottonwood tracts typical of this species' habitat. The small patches/stringers of cottonwood habitats on the Ashley National Forest are expected to persist over time if they continue to remain in satisfactory conditions.
Gila cypha Humpback chub	No suitable habitat on the Ashley National Forest	Climate change could affect water availability.	Water depletion-related projects	Not applicable
Gila elegans Bonytail chub	No suitable habitat on the Ashley National Forest	Climate change could affect water availability.	Water depletion-related projects	Not applicable
Ptychochelius lucius Colorado pikeminnow	No suitable habitat on the Ashley National Forest	Climate change could affect water availability.	Water depletion-related projects	Not applicable
Xyrauchen texanus Razorback sucker	No suitable habitat on the Ashley National Forest	Climate change could affect water availability.	Water depletion-related projects	Not applicable
Lepidium barnebyanum Barneby ridge-cress	No suitable habitat on the Ashley National Forest	Small population size and range	Off-road vehicle use and the development of oil and gas resources	Not applicable

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Phacelia argillacea Clay phacelia	No suitable habitat on the Ashley National Forest	Extremely restricted by climatic and edaphic factors; small population size	Habitat degradation and loss from human land-use activities, including livestock and sheep grazing, the Denver and Rio Grande Western Railroads, construction activities, and highway maintenance and construction activities	Not Applicable
Spiranthes diluvialis Ute ladies'-tresses	Habitat within the plan area consists of floodplains of the Green River that have satisfactory plant composition and hydrological conditions. This indicates stable population trends and species persistence.	Competition from aggressive graminoids (herbaceous plant) and willows may outcompete the plant. Climate change that would lead to consistent drier and warmer weather conditions may reduce the overall flow of the river.	Natural fluctuations in the streamflow may have affected habitat following the construction of the Flaming Gorge Dam. Invasive plants, such as tamarisk, may change vegetation composition and structure of stream riparian communities.	Plants positively respond to occasional disturbances that reduce the vegetation competition. Periodic water discharges from the Flaming Gorge Dam that simulate high spring water flows provide a disturbance mechanism that clears or reduces floodplains of woody debris, which improves habitat conditions for the plant. If the Forest Service implements or maintains weed control measures, or both, that reduce or eradicate invasive plant species along river floodplains, habitat sustainability within the plan area is indicated.

Table C-4. Current Habitat Conditions, Trends, and Risk Factors for Regional Forester Identified Plant and Wildlife Species of Conservation Concern

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Centrocercus urophasianus Greater sage-grouse	Sagebrush communities across the Ashley National Forest are generally in satisfactory condition. Some communities within the lower-elevation/drier LTAs (South Face, Green River, and Anthro Plateau) have invasion of cheatgrass and/or halogeton or are at risk of invasion. Sagebrush communities within all LTAs associated with sage-grouse habitat are being threatened by conifer encroachment.	Climate change could exacerbate the invasion of noxious weeds, such as halogeton and cheatgrass. It may also increase the fire frequency.	Habitat fragmentation/ degradation from oil and gas development and other anthropogenic disturbances	In 2015, conservation measures to conserve this species' habitats were amended into the 1986 Forest Plan. It is likely that this species' habitats are likely to be maintained over time if similar conservation measures are carried into the revised forest plan. Cheatgrass invasion, if not deterred, may reduce the quality of habitat over time. Conifer encroachment will eventually result in the loss of sagebrush communities, if encroachment is not deterred.
Falco peregrinus Peregrine falcon	Cliffs are rarely threatened, if at all, and are not a concern. Riparian habitats in LTAs associated with this species' habitat are generally in satisfactory condition. A few isolated areas may not be in satisfactory condition, but they are trending that direction.	Climate change could reduce the amount of riparian habitat.	Noise disturbance to nesting birds and riparian habitat degradation	Nesting habitat (cliffs) is likely to remain sustainable over time. This is because there are few, if any, threats to this habitat on the Ashley National Forest. Riparian habitat will remain sustainable if it continues in satisfactory condition or trends toward satisfactory conditions over time.
Leucosticte atrata Black rosy-finch	High-elevation, rocky areas are generally not threatened and are not a concern. Alpine areas within LTAs associated with this species are generally in satisfactory conditions.	Climate change could reduce the amount of snowbanks that persist into the early summer.	Habitat loss and degradation from mining or improper grazing	Currently there are few human-related activities that occur on or threaten this species' habitat; this, this species' habitats are likely to remain sustainable over time. This is especially true if habitat continues to remain or trend toward satisfactory conditions.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Sylvilagus idahoensis Pygmy rabbit	Sagebrush communities within the Green River LTA have been invaded or are at risk of invasion of cheatgrass or halogeton, or both.	Climate change could exacerbate the invasion of noxious weeds, such as halogeton and cheatgrass. Cheatgrass may reduce habitat quality and may also increase the fire return interval, which would reduce habitat for this species.	Habitat degradation from grazing and energy development	This species' habitat is likely to remain sustainable over time if cheatgrass expansion is deterred or slowed.
Myotis thysanodes Fringed myotis (bat)	Hibernacula and maternity sites (caves) are critical habitat components for this species. Caves on the Ashley National Forest are generally protected and are in satisfactory condition. Conifers in all LTAs (associated with this species' habitats) have been affected by beetles. Pinyon-juniper habitats are advancing in all LTAs. With a few exceptions, riparian habitats in associated LTAs are generally in satisfactory condition. These few exceptions are trending toward satisfactory condition.	Spread of white-nose syndrome (WNS). Spruce/pine beetle outbreaks in associated LTAs may continue to affect this habitat.	Human disturbance to hibernacula and maternity sites in caves. Degradation of riparian habitats. Fungal spread (WNS) via recreational caving.	This species' habitats are likely to remain sustainable over time if satisfactory conditions are maintained. The primary threat to this species is WNS; it is uncertain if, or when, it will spread to bat populations on the Ashley National Forest. This is likely to be the primary factor affecting this species' persistence over time on the Ashley National Forest. Conifers will regenerate from the beetle outbreak over time.
Ovis canadensis Bighorn sheep	Habitat conditions are generally in satisfactory condition; however, conifer encroachment occurs in all LTAs where habitat occurs. Cheatgrass invasion has also occurred in some areas of the lower-elevation LTAs.	Climate change could exacerbate the invasion of noxious weeds, such as cheatgrass. It may also increase the fire frequency; however, as stated earlier, fire can improve habitat conditions by creating open habitat.	The potential for respiratory pathogen transmission from domestic sheep. Habitat loss from anthropogenic disturbance.	Connectivity of open habitat associated with steep, rocky terrain is sustainable with habitat improvement projects that reduce conifer encroachment and cheatgrass invasion.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Oncorynchus clarki plueriticus Colorado River cutthroat trout	The existing aquatic habitat in most LTAs is in suitable condition. Isolated areas of overgrazing or illegal ATV use cause some sedimentation, but this is not a major concern. Riparian vegetation is at or trending toward desired condition and is helpful to maintain suitable water temperatures.	Climate change could increase stream temperatures and affect seasonal flow conditions to the point it may affect recruitment. Climate change could increase the risk of catastrophic fire, which could have a negative effect on habitat conditions through increased sedimentation causing increased stream temperatures and reduced spawning areas.	With the increase of various forms of recreation, such as ATV use, increased sedimentation could result. Stocking of nonnative fish can have a negative effect on Colorado River cutthroat trout.	Suitable habitat is currently abundant on the Ashley National Forest. In general, this habitat is only threatened in isolated areas.
Antennaria pulcherrima Handsome pussytoes	Habitat consists of intermediate to rich fens that have satisfactory plant composition, ground cover, and hydrological conditions. These indicate stable population trends and species persistence (Huber 2016).	Climate change that would lead to drier and warmer weather conditions may change the hydrologic function of the fens. Drying conditions may lead to changes in plant community composition. In theory, the plant has room to migrate upslope in the plan area to suitable habitat at elevations up to 11,200 feet, which would be about 2,000 feet of elevational migration.	The fens are accessible to livestock and have over a 100-year history of grazing use. Livestock grazing is a relative threat to the plant, but wet conditions help restrict livestock from accessing or grazing much of the habitat type. Some grazing impacts are documented along the ecotones and drier areas of the habitat. Some indication of off-road vehicle use along the ecotone of fens has been observed. Wet conditions minimize vehicle impacts within the fens.	Long-term monitoring indicates sustainability of fen habitat with current stressors. A stable trend in plant populations, habitat, and hydrological condition is indicated over a 30-year period, concurrent with livestock grazing, recreation, and environmental conditions. Livestock stocking rates, grazing intensities, allotment management, and recreation need to remain at current levels or less to maintain habitat integrity. If the climate becomes consistently warmer and drier, fen habitat integrity may be compromised, and plant populations may diminish if upslope migration does not occur (Huber 2016).

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Aquilegia grahamii Graham's columbine	Habitat consists of both wet and dry cliff cracks and ledges, and in seeps or hanging gardens. Habitat within the plan area is and has been undisturbed. It is considered in satisfactory condition. The plant population trend appears stable and persisting.	Due to the vertical habitat of the canyon walls, there are currently no known existing or potential threats of populations within the plan area, which contains the core populations of the plant. Climate change that would lead to drier and warmer weather conditions may change the hydrologic function of seeps and hanging gardens, but the plant also persists in dry conditions.	There are no known human-related stressors within the plan area; however, a couple of populations adjacent to the plan area may be threatened by surface mine activity.	Habitat sustainability within the plan area is indicated. Habitat is well protected from human-related stressors due to its topography and relative inaccessibility. A warmer and drier climate is expected to have minimal effect on plant populations because of the plant's ability to persist in dry conditions.
Cirsium ownbeyi Ownbey's thistle	Habitat consists of desert and montane shrub communities, semi-barrens, and rocky crevices and slopes. The plant composition of the habitat is satisfactory and devoid of annual invasive plants. The habitat trend is determined as stable. Populations appear stable and persisting.	There are no known natural stressors. Annual invasive plants could be a foreseeable stressor, which could change the plant community composition and fire frequency. The plant at least tolerates, if not benefits from, natural disturbances. Climate change is not considered a foreseeable stressor but may accelerate the spread of annual invasive plants.	May be vulnerable to herbicide spraying, biocontrol insects, or disturbance by recreation vehicles. The plant is known to colonize roadsides and other human- and nature-related disturbances.	The habitat is sustainable under current conditions and stressors. There is no evidence of plant populations being affected from herbicide spraying or biological controls, but populations need to be avoided and accounted for when noxious weed control measures are implemented. The most apparent foreseeable threat to habitat is annual invasive plants, such as cheatgrass. Annual invasive plants could change the community composition and increase the fire frequency, which would compromise habitat integrity and threaten plant populations.
Cymopterus evertii Evert's wafer parsnip	Habitat consists of limestone gravels within scattered Douglas-fir and limber pine. Habitat within the plan area is undisturbed and is considered in satisfactory condition. The plant population trend appears stable and persisting. Populations appear stable and persisting (Huber 2016).	There are no known immediate ecological threats. Two foreseeable threats are conifer recruitment and displacement, and fire.	The plant habitat is relatively inaccessible to humans. No known human-related stressors are identified.	The habitat is sustainable under current conditions and stressors; however, an upward trend in conifer recruitment within the habitat may affect plant populations.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Cypripedium fasciculatum Clustered lady's slipper	Habitat consists of moderately dense to dense lodgepole pine forests where duff litter has accumulated and understory plant species are sparse. Habitat within the plan area is in satisfactory condition and has been conserved due to its current sensitive species status. Known populations are stable, and persistence is indicated (Huber 2016).	Ecological stressors are those that greatly reduced or eliminate coniferous shade and increase herbaceous understory species. Stand-replacement fire is a known ecological stressor that temporarily reduces quality habitat (40–100 years). Mixed coniferous forests trending from lodgepole pine to Engelmann spruce and subalpine fir may reduce or eliminate habitat. In these situations, long-term persistence of this plant could be dependent on periodic fire that maintains lodgepole pine stands and prevents a trend toward spruce and fir dominance. Tree die-off from bark beetle epidemics that opens tree canopies, reduces shade, and promotes the establishment of other understory plants can suppress or eliminate clustered lady's slipper populations.	Timber harvesting is a human-related stressor that, similar to fire, reduces quality habitat. Timber management has been modified to protect existing plant populations.	Long-term monitoring indicates sustainability of habitat with current stressors. A stable trend in plant populations and habitat condition is indicated over a 30-year period under current management as a Forest Service sensitive species. The Forest Service needs to maintain current timber management practices to conserve habitat and plant populations. Fire would temporarily reduce habitat and negatively affect plant populations; however, plant populations have persisted and are expected to persist concurrent with fire within natural burn intervals (150–300 years). Similar to fire, bark beetle epidemics can temporarily reduce habitat and negatively affect plant populations; however, plant populations have persisted and are expected to persist concurrent with current and future bark beetle epidemics.
Draba brachystylis Wasatch draba	Habitat consists of soils with limestone rocks, talus, or scree. Habitat within the plan area is and has been undisturbed; it is considered in satisfactory condition. The plant population trend and persistence are unknown, but they are likely stable due to undisturbed habitat.	There are no known natural stressors of the population within the plan area.	There are no known human-related stressors of the population within the plan area. Habitat is threatened by development and increased recreation use outside and disjunct from the plan area.	Habitat sustainability within the plan area is indicated. Habitat is well protected from human-related stressors due to its topography and relative inaccessibility.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Draba globosa Rockcress draba	Habitat consists of alpine tundra, often associated with persisting snow beds. Numerous long-term studies indicate that habitat plant composition and ground cover are in satisfactory conditions with stable trends. Stable populations are widely distributed across the plan area, and persistence is indicated (Huber 2016).	Climate change that would lead to drier and warmer conditions may be a stressor. Populations occur at the highest elevations of the plan area, which would eliminate the possibility of upslope migration during a warming climate. Plants commonly grow in disturbed, open ground of snow beds, indicating disturbance as a favorable habitat condition.	Most populations are relatively inaccessible to human impacts. Domestic sheep and mountain goat browsing, and recreation are minimal human-related stressors. The plant's very low, pulvinate-caespitose[1] habit provides some protection from ungulate browsing. Domestic sheep grazing has decreased considerably over the last 50 years. Although few in total numbers, mountain goat populations show a gradual upward trend over the last 30 years.	Long-term monitoring indicates sustainability of alpine habitat with current stressors; surveys and botanical collections document widely distributed and stable plant populations. Stable trends in habitat are indicated over a 60-year period, concurrent with livestock grazing, remote recreation activities, and environmental conditions. Sheep grazing has diminished considerably over the last plan period, but mountain goat populations have slowly increased. Current and foreseeable ungulate use of habitat are not expected to diminish plant populations or compromise habitat during the next plan period. If the climate becomes consistently warmer and drier, habitat integrity may be compromised, and plant populations may diminish. This is because upslope migration of plants and habitat is not optional.
Draba ventosa Tundra draba	Habitat consists of alpine talus, scree slopes, slides, fell-fields, and ridge crests. Habitat within the plan area is and has been undisturbed; it is considered in satisfactory condition. The plant population trend appears stable, and persistence is indicated.	Climate change that would lead to drier and warmer conditions may be a stressor. Populations occur at the highest elevations of the plan area, which would eliminate the possibility of upslope migration during a warming climate.	Habitat is relatively remote, rugged, and inaccessible to sheep grazing, humans and their impacts. Mountain goat browsing is a minimal threat. Mountain goat populations show a gradual upward trend over the last 30 years.	Long-term monitoring indicates the sustainability of alpine habitat with current stressors. Stable trends in plant populations and habitat are indicated. This is because the habitat is relatively remote, rugged, and inaccessible to sheep grazing, humans, and their impacts. Current and foreseeable ungulate use of the habitat is not expected to diminish plant populations or compromise the habitat during the next plan period. If the climate becomes consistently warmer and drier, habitat integrity may be compromised, and plant populations may diminish. This is because upslope migration of plants and the habitat is not optional.

[1] Cushion forming; grows in dense tufts or clumps

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Erigeron untermannii Untermann's daisy	Habitat consists of semi-barrens along ridge tops, occasionally with scattered pinyon-juniper, Douglas-fir, and limber pine-bristle cone pine. Long-term studies document satisfactory habitat conditions with stable population trends and persistence (Huber 2016).	No ecological stressors have been identified. Climate change is not a foreseeable stressor.	Oil and gas exploration is a foreseeable stressor. Due to its current sensitive species designation, its habitat has been excluded from development and other potential disturbances. Livestock grazing is a minor stressor; however, most known populations are inaccessible to livestock grazing due to steep slopes or the distance to water, or both. Habitats accessible to livestock are not preferred forage areas due to their semi-barren character. Livestock impacts are limited to occasional trailing across the habitat.	Long-term monitoring indicates the sustainability of habitat with current stressors. A stable trend in plant populations and habitat conditions is indicated over a 30-year period under current management as a Forest Service sensitive species, which mitigates for current and potential oil and gas exploration. The Forest Service should maintain current mineral extraction practices to conserve habitat and plant populations. Maintenance of habitat and plant populations are predicted under current livestock grazing management due to the habitat's "non-capable" livestock grazing status.
Kobresia simpliciuscula Compound Kobresia	Habitat consists of intermediate to rich fens that have satisfactory plant composition, ground cover, and hydrological conditions. These indicate stable population trends and species persistence (Huber 2016).	Climate change that would lead to drier and warmer weather conditions may change the hydrologic function of the fens. Drying conditions may lead to changes in the plant community composition. In theory, the plant has room to migrate upslope in the plan area to suitable habitat at elevations up to 11,200 feet, which would be about 2,000 feet of elevational migration.	The fens are accessible to livestock and have over a 100-year history of grazing use. Livestock grazing is a relative threat to the plant, but wet conditions help restrict livestock from accessing or grazing much of the habitat type. Some grazing impacts are documented along the ecotones and drier areas of the habitat.	Long-term monitoring indicates sustainability of fen habitat with current stressors. A stable trend in plant populations, habitat, and hydrological conditions is indicated over a 30-year period, concurrent with livestock grazing, recreation, and environmental conditions. Livestock stocking rates, grazing intensities, allotment management, and recreation activity need to remain at current levels or less to maintain habitat integrity. If the climate becomes consistently warmer and drier, fen habitat integrity may be compromised, and plant populations may diminish if upslope migration does not occur.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Lepidium huberi Huber's pepperplant	Habitat consists of eroding slopes and narrow, steep canyons, often associated with mountain brush and ponderosa pine. Habitat within the plan area is and has been undisturbed; it is considered in satisfactory condition. The plant population trend appears stable, and persistence is indicated (Huber 2016).	No ecological stressors have been identified. Climate change is not a foreseeable stressor.	No stressors have been identified within the plan area. Habitat is relatively accessible to livestock grazing; however, the plant is not selected for forage, and habitat terrain is often steep for trailing. Minimal threats may be oil and gas exploration and mining outside the plan area. A foreseeable stressor may be off-road vehicle use in more accessible habitat. The plant is found along roadsides and in fresh alluvium, which indicates some tolerance to disturbance.	Habitat sustainability within the plan area is indicated. Most habitat is protected from human-related stressors due to its topography. The Forest Service should continue current policies or implement off-road vehicle use policies that would protect more accessible habitat. Maintenance of habitat and plant populations is predicted under current livestock grazing management due to the habitat's "non-capable" livestock grazing status.
Mentzelia goodrichii Goodrich's blazingstar	Habitat consists of escarpments, eroding slopes, and semi-barrens; it is occasionally associated with pinyon-juniper or Douglas-fir. Habitat within the plan area is and has been undisturbed; it is considered in satisfactory condition. The plant population trend appears stable, and persistence is indicated (Huber 2016).	No ecological stressors have been identified. Climate change is not a foreseeable stressor.	Known populations are highly protected from livestock grazing by steep, eroding slopes; the distance to water; and a lack of preferred forage. Oil and gas exploration is a foreseeable stressor but likely limited due to steep, eroding terrain.	Habitat sustainability within the plan area is indicated. A stable trend in plant populations and habitat conditions is indicated over a 30-year period under current management as a Forest Service sensitive species, which mitigates for current and potential oil and gas exploration and other threats. The Forest Service should maintain current mineral extraction practices to conserve habitat and plant populations. Maintenance of habitat and plant populations are predicted under current livestock grazing management due to the habitat's "non-capable" livestock grazing status.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Oxytropis besseyi var. *obnapiformis* Maybell locoweed	Habitat consists of semi-barrens and is often associated with pinyon-juniper and sagebrush communities. Habitat within the plan area is very limited but is considered to be in satisfactory condition. Core populations are located outside the plan area. Due to a single occurrence, the population trend and persistence are unknown; however, populations in Wyoming are determined to be stable.	No ecological stressors have been identified. A foreseeable stressor may be annual invasive plants. Pinyon-juniper and Wyoming sagebrush communities may be susceptible to annual invasive species. Climate change is considered a foreseeable stressor, and it may accelerate the spread of annual invasive plants.	No stressors have been identified within the plan area. Outside the plan area, oil and gas development, excessive grazing, recreation, road construction, and recreational off-road vehicles are listed as stressors.	Habitat is limited within the plan area and appears sustainable under current conditions and stressors. The Forest Service should recognize and mitigate for potential human-related stressors to maintain habitat integrity. The most apparent foreseeable threat to habitat is annual invasive plants, such as cheatgrass. Annual invasive plants could change the community composition and increase the fire frequency, which would compromise habitat integrity and threaten plant populations.
Papaver radicatum var. *kluanense* Alpine poppy	Habitat consists of Red Pine Shale talus slopes and ridge tops in alpine settings. Habitat is and has been undisturbed; it is considered in satisfactory condition. The plant population trend appears stable, and persistence is indicated (Huber 2016).	Pikas use alpine poppy but are considered a minimal threat. Populations continue to persist concurrent with pika use. Climate change that would lead to drier and warmer conditions may be a stressor. Populations occur at the highest elevations of the plan area, which would eliminate the possibility of upslope migration during a warming climate.	No human-related stressors are identified. The habitat is remote, rugged, and inaccessible to humans and their impacts. Mountain goat browsing is a minimal threat. Mountain goat populations show a gradual upward trend over the last 30 years.	Long-term monitoring indicates sustainability of talus and scree habitat with current stressors. A stable trend in plant populations and habitat conditions is indicated over a 30-year period under current management as a Forest Service sensitive species. Mountain goat populations have slowly increased, but current and foreseeable ungulate use of the habitat is not expected to diminish plant populations or compromise the habitat during the next plan period. If the climate becomes consistently warmer and drier, habitat integrity may be compromised, and plant populations may diminish. This is because upslope migration of plants and habitat is not optional.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Penstemon acaulis Stemless beardtongue	Habitat consists of mixed-desert shrub, black sagebrush, Wyoming big sagebrush, and pinyon-juniper communities. Long-term monitoring indicates that habitat conditions are satisfactory, populations are stable, and persistence is documented (Huber 2016).	A foreseeable stressor may be annual invasive plants. Pinyon-juniper and black and Wyoming sagebrush communities are known to be susceptible to annual invasive species. Climate change that would lead to drier and warmer conditions may be a stressor. The plant has room to migrate upslope in the plan area to more suitable habitat if a warming climate occurs.	In Utah, listed stressors include recreation, off-road vehicles, and livestock trampling. In Wyoming, stressors also include gravel quarrying and road construction. The plant benefits from disturbance, including severe land disturbances. It has been found to colonize two-track roads, road sides, gravel pits, communication facilities, and trails. The density and size of plants within disturbances are equal to or greater than those in undisturbed habitat. The plant has persisted with livestock grazing for over 100 years. Grazing appears to minimally affect the plant.	Long-term monitoring indicates sustainability of habitat with current stressors. A stable trend in plant populations and habitat conditions is indicated over a 30-year period under current management as a Forest Service sensitive species, which mitigates for human-related activities. Livestock stocking rates, grazing intensities, allotment management, and recreation activity must remain at current levels or less to maintain habitat integrity. If the climate becomes consistently warmer and drier, habitat integrity may be compromised, and plant populations may diminish if upslope migration does not occur. The most apparent foreseeable threat to the habitat is annual invasive plants, such as cheatgrass. Annual invasive plants could change the community composition and increase the fire frequency, which would compromise habitat integrity and threaten plant populations.
Phacelia glandulosa var. *deserta* Desert phacelia	Habitat consists of desert shrub and Wyoming big sagebrush communities. Habitat within the plan area is in satisfactory condition. Core populations are located outside the plan area. With a single occurrence in the plan area, the population trend and persistence are unknown.	No ecological stressors have been identified. A foreseeable stressor may be annual invasive plants. Desert shrub and Wyoming sagebrush communities are known to be susceptible to annual invasive species. Climate change is not considered a foreseeable stressor, but it may accelerate the spread of annual invasive plants.	Outside the plan area, off-road vehicle use or mineral exploration are noted human-related stressors. Off-road vehicle use and other recreational activities that lead to surface disturbance are stressors within the plan area.	The habitat is sustainable under current conditions and stressors. The most apparent foreseeable threat to the habitat is annual invasive plants, such as cheatgrass. Annual invasive plants could change the community composition and increase the fire frequency, which would compromise habitat integrity and threaten plant populations. The Forest Service should recognize and mitigate for potential human-related stressors to maintain habitat integrity.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
Primula incana Silvery primrose	Habitat consists of intermediate to rich fens that have satisfactory plant composition, ground cover, and hydrological conditions; these indicate stable population trends and species persistence (Huber 2016).	Climate change that would lead to drier and warmer weather conditions may change the hydrologic function of the fens. Drying conditions may lead to changes in the plant community composition. In theory, the plant has room to migrate upslope in the plan area to suitable habitat at elevations up to 11,200 feet, which would be about 2,000 feet of elevational migration.	The fens are accessible to livestock and have over a 100-year history of grazing use. Livestock grazing is a relative threat to the plant, but wet conditions help restrict livestock from accessing or grazing much of the habitat type. Some grazing impacts are documented along the ecotones and drier areas of the habitat.	Long-term monitoring indicates sustainability of fen habitat with current stressors. A stable trend in plant populations, habitat, and hydrological conditions is indicated over a 30-year period, concurrent with livestock grazing, recreation, and environmental conditions. Livestock stocking rates, grazing intensities, allotment management, and recreation activity need to remain at current levels or less to maintain habitat integrity. If the climate becomes consistently warmer and drier, fen habitat integrity may be compromised, and plant populations may diminish if upslope migration does not occur.

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Phacelia glandulosa var. *deserta* Desert phacelia	Habitat consists of desert shrub and Wyoming big sagebrush communities. Habitat within the plan area is in satisfactory condition. Core populations are located outside the plan area. With a single occurrence in the plan area, the population trend and persistence are unknown.	No ecological stressors have been identified. A foreseeable stressor may be annual invasive plants. Desert shrub and Wyoming sagebrush communities are known to be susceptible to annual invasive species. Climate change is not considered a foreseeable stressor, but it may accelerate the spread of annual invasive plants.	Outside the plan area, off-road vehicle use or mineral exploration are noted human-related stressors. Off-road vehicle use and other recreational activities that lead to surface disturbance are stressors within the plan area.	The habitat is sustainable under current conditions and stressors. The most apparent foreseeable threat to the habitat is annual invasive plants, such as cheatgrass. Annual invasive plants could change the community composition and increase the fire frequency, which would compromise habitat integrity and threaten plant populations. The Forest Service should recognize and mitigate for potential human-related stressors to maintain habitat integrity.

Scientific Name/Common Name	Current Habitat Conditions	Ecological Stressors	Human-Related Stressors	Habitat Sustainability
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Appendix D

Persistence Analysis for At-Risk Species

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Appendix D. Persistence Analysis for At-Risk Species

Introduction

Notable Changes Between Draft and Final

The plan component crosswalks that had been included as attachment E to appendix E of the draft EIS, the draft revised forest plan, are now included in this appendix to the final EIS. Updates to these crosswalks include the addition of plan components that were added to the forest plan related to at-risk species and habitat, as well as the addition of two at-risk species (wolverine and Mexican spotted owl). References to plan component numbers were updated throughout this appendix.

Other content related to at-risk species that has been changed or added includes:

- Bighorn sheep: Management direction for bighorn sheep was updated; see plan wildlife guidelines (FW-GD-WILDL-09 and 10) and goals (FW-GO-WILDL-03). Modifications include updated direction for providing separation between domestic sheep and bighorn sheep, focusing on collaboration with State agencies, utilizing memorandums of understanding, and applying site-specific management strategies described in domestic sheep permit annual operating instructions.
- Sage-grouse: A guideline (FW-GD-WILDL-11) was added stating, "Management actions should avoid degradation of occupied sage-grouse habitat," with specific dates to avoid disturbances and compensatory mitigation.
- Native bumble bees: A guideline was added to restrict the use of commercial apiaries if there is a threat of pathogen transfer from commercial apiaries to native bumble bees (see FW-GD-WILDL-12).
- Migratory birds: A guideline was added to evaluate the effects of ground-disturbing and vegetation management activities and, as practical, mitigate activities to lessen impacts to birds of conservation concern identified by the U.S. Fish and Wildlife Service (see FW-GD-WILDL-14).
- Wildlife corridors: A management approach that directs the evaluation of the effects of ground-disturbing and vegetation management activities on migrating ungulates and connective habitat was changed to a guideline and the following language was added to this guideline: "and, as practical, mitigate activities to lessen the impact to migrating ungulates" (see FW-GD-WILDL-15).

2012 Planning Rule Framework for Species Persistence Analysis

The 2012 Planning Rule[1] requires the Forest Service to include plan components[2] to "maintain or restore" (1) "the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area," and (2) "the diversity of ecosystems and habitat types throughout the plan area." It also requires plans be based on a complementary ecosystem and species-specific approach; this approach is referred to as the coarse-filter and fine-filter approach.

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[1] 36 CFR 219.9(a).

[2] The 2012 Planning Rule sets forth five required plan components (desired conditions, objectives, standards, guidelines, and suitability of lands) and one optional plan component (goals) (36 CFR. 219.7(e)(1)–(2)). 36 CFR 219.7(f)(1)–(2) sets forth other required and optional content of forest plans.

Under 36 CFR 219.9(b)(1), the responsible official (here, the Forest Supervisor for the Ashley National Forest) must determine whether the plan components required by 36 CFR 219.9(a) provide the ecological conditions necessary to "contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern[3] within the plan area." The 2012 Planning Rule sets forth three possible outcomes of the responsible official's analysis of plan components with respect to species of conservation concern. Additionally, a fourth outcome may arise when the responsible official has developed a set of ecosystem-level plan components they think will provide for species persistence, but the responsible official also provides supplementary species-specific plan components for greater emphasis and clarity (all four determinations are presented in the "Determination" section below).

The 2012 Planning Rule defines a "viable population" as "[a] population of a species that continues to persist over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments."[4] that The preamble to the 2012 Planning Rule defines the meaning of the word "population" for planning purposes: "the individuals of a species of conservation concern that exist in the plan area will be considered to be members of one population of that species."[5]

This species persistence analysis documents the basis for the responsible official's determination for each species of conservation concern in the plan area.

Summary of Determination Outcomes

Determinations for each species will have one of four possible outcomes:

1. The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of the [SPECIES NAME] in the plan area. No additional species-specific plan components are warranted.
2. The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of the [SPECIES NAME] in the plan area. Nonetheless, additional species-specific plan components have been provided for added clarity or measures of protection, or both.
3. The ecosystem plan components may not provide the ecological conditions necessary to maintain a viable population of the [SPECIES NAME] in the plan area. Therefore, additional species-specific plan components have been provided. The combination of ecosystem and species-specific plan components should provide the ecological conditions necessary to maintain a viable population of the [SPECIES NAME] in the plan area.
4. It is beyond the authority of the Forest Service or not within the inherent capability of the plan area to maintain or restore the ecological conditions to maintain a viable population of the [SPECIES NAME] in the plan area. Nonetheless, the plan components should maintain or restore ecological conditions within the plan area to contribute to maintaining a viable population of the species within its range.

[3] A "species of conservation concern" is defined as a "species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area" (36 CFR 219.9(c)).
[4] 36 CFR 219.19.
[5] 77 *Federal Register* 21217, April 9, 2012.

Table D-1 summarizes the responsible official's determination for each of the at-risk species with the potential to exist on the Ashley National Forest plan area over the life of the forest plan (that is, 15 years). If it is unknown whether an existing viable population exists within the plan area, the determination outcome defaulted to being beyond the authority of the Forest Service or not within the inherent capability of the plan area to maintain a viable population of the species. However, this does not mean forest plan components disregard these species' persistence or habitat needs. In most cases, forestwide or ecosystem-level components to maintain terrestrial, aquatic, and special habitats and forestwide species direction will provide the needed management to maintain or expand a local population, if one exists.

Table D-1. Summary of Determination Outcomes for the Ashley National Forest

Species	At-Risk Species	Status[1]	Determination Outcome*			
			1	2	3	4
Mammals	Canada lynx (*Lynx canadensis*)	FT				X**
	American wolverine (*Gulo gulo*)	FP				X
	Bighorn sheep (*Ovis canadensis*)	SCC			X	
	Fringed myotis (*Myotis thysanodes*)	SCC		X		
	Pygmy rabbit (*Sylvilagus idahoensis*)	SCC		X		
Birds	Mexican spotted owl (*Strix occidentalis lucida*)	FT				X
	Black rosy-finch (*Leucosticte atrata*)	SCC	X			
	Greater sage-grouse (*Centrocercus urophasianus*)	SCC			X	
	Peregrine falcon (*Falco peregrinus*)	SCC		X		
Fish	Colorado River cutthroat trout (*Oncorhynchus clarkii pleuriticus*)	SCC			X	
Terrestrial Invertebrates	Eureka mountain snail (*Oreohelix eurekensis*)	SCC				X
Plants	Ute ladies'-tresses (*Spiranthes diluvialis*)	FT	X			
	Handsome pussytoes (*Antennaria pulcherrima*)	SCC	X			
	Graham's columbine (*Aquilegia grahamii*)	SCC	X			
	Ownbey's thistle (*Cirsium ownbeyi*)	SCC	X			
	Evert's wafer parsnip (*Cymopterus evertii*)	SCC		X		
	Clustered lady's slipper (*Cypripedium fasciculatum*)	SCC	X			
	Wasatch draba (*Draba brachystylis*)	SCC	X			
	Rockcress draba (*Draba globosa*)	SCC	X			
	Tundra draba (*Draba ventosa*)	SCC	X			
	Untermann's daisy (*Erigeron untermannii*)	SCC	X			
	Compound kobresia (*Kobresia simpliciuscula*)	SCC	X			
	Huber's pepperplant (Lepidium huberi)	SCC	X			

Species	At-Risk Species	Status[1]	Determination Outcome*			
Plants *(cont.)*	Goodrich's blazingstar (Mentzelia goodrichii)	SCC	X			
	Maybell locoweed (Oxytropis besseyi var. obnapiformis)	SCC	X			
	Alpine poppy (Papaver radicatum var. kluanense)	SCC	X			
	Stemless beardtongue (Penstemon acaulis)	SCC	X			
	Desert phacelia (Phacelia glandulosa var. deserta)	SCC	X			
	Silvery primrose (Primula incana) R	SCC	X			

[1]SCC = species of conservation concern; FT = federally threatened; FP = federally proposed

*Determination outcomes:

1. The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of the [SPECIES NAME] in the plan area. No additional species-specific plan components are warranted.
2. The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of the [SPECIES NAME] in the plan area. Nonetheless, additional species-specific plan components have been provided for added clarity or measures of protection, or both.
3. The ecosystem plan components may not provide the ecological conditions necessary to maintain a viable population of the [SPECIES NAME] in the plan area. Therefore, additional species-specific plan components have been provided. The combination of ecosystem and species-specific plan components should provide the ecological conditions necessary to maintain a viable population of the [SPECIES NAME] in the plan area.
4. It is beyond the authority of the Forest Service or not within the inherent capability of the plan area to maintain or restore the ecological conditions to maintain a viable population of the [SPECIES NAME] in the plan area. Nonetheless, the plan components should maintain or restore ecological conditions within the plan area to contribute to maintaining a viable population of the species within its range.

**The determination outcome for the lynx is a modification of outcome 4: It is not within the inherent capability of the plan area to maintain or restore the ecological conditions to maintain a viable population of Canada lynx in the plan area. Nonetheless, the plan components should maintain or restore ecological conditions within the plan area to contribute to maintaining peripheral habitat that may support lynx dispersal.

Ecosystem-Level and Species-Specific Plan Components for Species at Risk

Several coarse-filter ecosystem-level plan components focus on at-risk species and species of conservation concern; however, these components are not necessarily species specific. They add additional emphasis to key ecological conditions for many species of conservation concern. While generally broad, these plan components provide for ecosystems and habitat conditions for resiliency to disturbance (both natural and human caused) and the effects of climate change and widespread tree mortality. They also mitigate site-specific effects that might occur during projects or forest management activities implemented under forest plans in riparian areas, watersheds, terrestrial ecosystems, recreation areas, and wilderness. The specific ecosystem-level plan components that would help alleviate threats to at-risk species are listed and are discussed in the individual species evaluations below. For some species, additional species-specific components are included to further mitigate specific threats. These are also listed and discussed in the individual species evaluations below.

Individual Species Evaluations

Background

The individual species evaluations below summarize the key ecological conditions and risk factors for each species and the plan components that mitigate those risk factors, provide for persistence, and contribute to maintaining a viable population within the plan area. These individual evaluations do not evaluate the yellow-billed cuckoo since typical habitat for this species does not occur on the Ashley National Forest. See the biological assessment for more information regarding federally listed species. Also see appendix C, At-Risk Species, for more information on at-risk species, such as the current distribution in the plan area. The Forest Service completed the at-risk species report (appendix C) during the assessment phase of the forest plan revision process. At the time the report was completed, the wolverine was not a federally proposed species, and the Eureka mountainsnail was added to the list of SCC after the assessment process was completed. Thus, the report (appendix C) does not include those two species.

Key threats to persistence, the most relevant summarized plan components that alleviate those threats, and a summary of why plan components do or do not provide for viability in the plan area are described for each wildlife species of conservation concern. The tables in this section for each species only contain the key plan components that address risk factors to the species; they do not contain all plan components that contribute to the persistence of the species. Refer to the plan component crosswalk tables at the end of this appendix for a more complete list of plan components that contribute to the persistence of each at-risk species. Plan components cannot prevent all adverse impacts on individuals of a species; the Forest Service has designed the plan components to provide for viability of the species population at the plan level only and with consideration of management activities over the duration of the forest plan (15 years).

Mammals

Canada lynx

Determination: It is not within the inherent capability of the plan area to maintain or restore the ecological conditions to maintain a viable population of Canada lynx in the plan area. The Ashley National Forest is considered unoccupied peripheral habitat for Canada lynx that is incapable of supporting self-sustaining populations (ILBT 2013). Thus, other than periodic transient individuals, lynx are unlikely to occur in the plan area. However, if an individual lynx does temporarily disperse into the plan area and thus is potentially exposed to elements of Ashley National Forest land management, then the mosaic retention of peripheral lynx habitat will provide the life requisites for prey species and allow movement of individual transient lynx through habitat that will enable a transient lynx to procure sufficient food as it moves across the landscape.

General Key Ecological Conditions: Habitat for this species does not occur on the Wyoming portion of the Ashley National Forest. Key ecological conditions include forested areas, including Engelmann spruce, subalpine fir, and moist lodgepole pine with dense horizontal understory (ILBT 2013). Snowshoe hares are the primary prey for lynx, comprising 35–97 percent of their diet throughout the lynx's range. Southern populations of lynx may prey on a wider diversity of species than northern populations because of lower average hare densities and differences in small mammal communities. Other prey species include red squirrel, grouse, flying squirrel, ground squirrel, porcupine, beaver, mice, voles, shrews, fish, and ungulates as carrion or occasionally as prey. Foraging of reintroduced lynx in Colorado consisted primarily of snowshoe hare and red squirrel (varying percentages) but also other small mammals and birds (Shenk 2007; Forest Service 2006b; ILBT 2013)

Snowshoe hares (the primary lynx prey species) use aspen stands much less than conifer stands in this area because aspen stands lack dense understory cover for snowshoe hares (ILBT 2013). Where intermixed with spruce-fir and moist lodgepole pine stands, aspen may contribute to lynx habitat (ILBT 2013). The Ashley National Forest does not contain critical lynx habitat, core lynx habitat, or secondary lynx habitat; however, it does contain peripheral lynx habitat (ILBT 2013). This peripheral lynx habitat on the Ashley National Forest is unoccupied and incapable of supporting self-sustaining lynx populations (ILBT 2013). Peripheral habitat does not support reproductive lynx populations; however, it is intended to provide a mosaic of forest structure within the landscape to support snowshoe hare prey resources for individual lynx that could infrequently move through or reside temporarily in the area (ILBT 2013). Therefore, the delineation and use of lynx analysis units on the Ashley National Forest is not necessary (ILBT 2013).

Key Threats to Persistence: Key potential threats to lynx in peripheral habitat are the general loss or degradation of habitat; habitat fragmentation, loss, or degradation through activities such as timber harvest and road building; insect and disease outbreaks; and climate change (ILBT 2013; Forest Service 2017a).

Summary: The Canada lynx is federally listed as a threatened species, but the Ashley National Forest is unlikely to support the species. The Ashley National Forest is considered a peripheral area for Canada lynx that is incapable of supporting self-sustaining populations (ILBT 2013). The 2007 Northern Rockies Lynx Management Direction (Forest Service 2007) determined the Ashley National Forest does not support Canada lynx and only contains unoccupied lynx habitat. The Ashley National Forest is isolated from core Canada lynx areas, and there is a lack of historical evidence of reproduction of Canada lynx on the Ashley National Forest (ILBT 2013).

There are very few historical records of lynx in the Uinta mountains (10 possible occurrence in the Uinta mountains between 1916 and 1972), and lynx have been considered rare in Utah (Forest Service 2006). Hair snare surveys were conducted on the Ashley National Forest from 1999 - 2001, but none of the hair samples collected were from Canada lynx (Forest Service 2006). Between 1999 and 2007, 22 lynx from the experimental release site in Colorado were located at least once in Utah. Use density of these locations indicates the primary area of use was in the Uinta Mountains. All individuals were transient and did not take up residency in the Uinta Mountains (Forest Service 2017b). There have been no other known occurrences of lynx on the Ashley National Forest since 2007. Prior to these recent occurrences of lynx from Colorado, the last known occurrence of Canada lynx in the Uinta mountains was in 1972 (Forest Service 2006, Christensen 2015). Winter track surveys and photographic bait stations on the Ashley National Forest from 2009 through 2022 did not detect any evidence of lynx on the Ashley National Forest (Dzialak and Evans 2005; Evans and Dzialak 2006; Evans 2007; Watt 2009; Christensen 2015, Maxfield 2021; Maxfield 2022; Forest Service 2022).

As stated above, the 2007 Northern Rockies Lynx Management Direction (Forest Service 2007) determined the Ashley National Forest does not support Canada lynx; it only contains unoccupied lynx habitat. Thus, the plan area does not contain a viable Canada lynx population and is unlikely to ever support a breeding female lynx (ILBT 2013). However, forest management in the form of desired conditions, goals, and standards for general wildlife, terrestrial and forest vegetation, timber, soils, watersheds and aquatic ecosystems, riparian management zones, and carbon storage and sequestration would maintain ecological conditions in the plan area to retain peripheral lynx habitat for possible lynx dispersal movements from core Canada lynx areas.

A large portion of this species' peripheral habitat on the Ashley National Forest is remote and receives little human-related impacts. Still, forest management activities have the potential to affect lynx

peripheral habitat. Timber harvest, prescribed fire, fuels reduction treatments, and road construction may contribute to habitat degradation and fragmentation, which may limit the suitability and individuals' use of peripheral habitat.

Potential effects on peripheral habitat from forest management activities are primarily addressed through forestwide plan components in table D-2 below, which details plan components that address key ecological conditions for lynx habitat, such as dense early successional coniferous stands and structural diversity (FW-GD-WILDL-13). Forestwide plan components emphasize resilient, connected forests containing the complex structural attributes for dispersing lynx that could infrequently move through or reside temporarily in the area (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04; FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02; FW-OB-CONIF-01; FW-GD-ASPEN-01 through 04; FW-ST-TIMB-01; FW-GD-TIMB-01 through 03; and FW-GD-SOIL-01 through 05).[6]

Timber harvest and fuels reduction treatments would occur on the Ashley National Forest, but treatments would be planned in a manner to meet vegetation desired conditions, to sustain the ecological resilience of timber stands and vegetation, and to maintain structural diversity across the landscape (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03; FW-DC-SOIL-01, 02, 04, and 05; FW-GD-SOIL-01 through 05; FW-DC-FIRE-03; FW-GD-FIRE-01, 03, and 04; and FW-GD-WILDL-13). Because a key requirement of peripheral habitat on the Ashley National Forest is foraging habitat (snowshoe hare and red squirrel habitat; ILBT 2013), a specific guideline for lynx (FW-GD-WILDL-13), adopted from the 2013 Lynx Conservation and Assessment Strategy, emphasizes a mosaic of multistory and dense, early successional coniferous and mixed coniferous/deciduous stands to be maintained on the planning area. This species-specific component would support prey populations and provide lynx cover for stalking prey (ILBT 2013). This would help maintain peripheral habitat for possible dispersal of Canada lynx onto the Ashley National Forest (FW-GD-WILDL-13), thereby alleviating threats from habitat loss and degradation.

The forest plan identifies designated management areas (for example, High Uintas Wilderness) and management areas (for example, recreation management areas). Management within designated recreation management areas is generally more restrictive of management actions than within other areas of the Ashley National Forest; thus, those actions are less likely to affect peripheral lynx habitat in these areas than in the Ashley National Forest's other areas. The Forest Service would manage recreation management areas by all the forestwide desired conditions, standards, and guidelines, as mentioned previously and in table D-2 below. Thus, peripheral lynx habitat would be maintained in these areas of the Ashley National Forest, as previously described. Additionally, recreation management areas do not propose specific actions; rather, they provide a framework for evaluating future proposed actions within those areas.

Ecological stressors, such as climate change and insect and disease outbreaks, are another potential threat to lynx peripheral habitat on the Ashley National Forest (Forest Service 2017a, 2017b); however, the implications of climate change are unclear (Halofsky et al. 2018a, 2018b; ILBT 2013). A reduction in deep snow would decrease winter foraging opportunities, but increases in mast-producing hardwoods and understory might increase structural diversity and habitat features within aspen and conifer mixed stands. Increases in the rate of loss of mature trees and fragmentation from open-canopied areas caused by

[6] The full language of the forest plan components listed here and throughout this document is provided in the forest plan.

wildfire could reduce peripheral habitat availability by reducing habitat for prey such as snowshoe hare and red squirrel; this would, therefore, reduce foraging opportunities.

Currently, most of the landscape is not resilient to large, high-intensity fire and is susceptible to drought and insect and disease outbreaks. Conifer mortality associated with insects tends to increase whenever annual precipitation is considerably less than the historical average (drought). The beetle epidemic has already decreased some lynx peripheral habitat on the Ashley National Forest; however, the lynx peripheral habitat is likely to persist as the conifer stands affected by the beetle epidemic regenerate over time. As this occurs, young, regenerating conifer stands, as well as snags falling to the forest floor over time, are likely to increase; these components would provide temporary areas for foraging that might be used by dispersing lynx that move through peripheral habitat (Forest Service 2017b; ILBT 2013). However, moisture stress and the frequency and severity of bark beetle outbreaks are projected to increase with increasing temperatures, resulting in widespread tree mortality (Halofsky et al. 2018a, 2018b).

Threats to peripheral habitat from ecological stressors are primarily addressed through the forestwide plan components in table D-2 below. General guidelines for wildlife aim to maintain at-risk species habitat on the Ashley National Forest by providing necessary habitat features and connectivity. Achieving desired conditions in terrestrial and forest vegetation would reduce threats from ecological factors by increasing the resiliency of ecosystems to stressors such as fire, insects, pathogens, and climate variability (FW-DC-VEGTER-01 to 09).

Additionally, multiple plan components emphasize a timber harvest program that would promote ecosystem health, sustainability, and resilience by modifying the composition, density, structure, and spatial arrangement of vegetation to achieve desired conditions. Such treatments may prevent future adverse effects on lynx peripheral habitat associated with climate change, widespread tree mortality, and wildfire. A specific standard and guideline to reduce tree susceptibility to bark beetle attack (FW-ST-TIMB-06 and FW-GD-CONIF-01) would help reduce the loss of lynx peripheral habitat from beetle kill.

Desired conditions for diverse and productive plant communities to maintain carbon stocks (FW-DC-CARBON-01) may also provide habitat features used by lynx, such as resilient, connected forests with structural complexity. These desired conditions also would support carbon stability, which might ultimately help mitigate climate-related habitat changes. Incorporating best available science and guidance in forest management (FW-GO-CLIM-01) would improve the resilience of habitat to climate change, thereby reducing the threat of stand-replacing fire and changes in the distribution of spruce and fir forests. This would ultimately increase forest resilience and connectivity, which would continue to provide peripheral habitat characteristics for lynx (ILBT 2013).

Table D-2 lists the key threats to persistence, plan component that alleviate or eliminate key threats, and an effects summary.

Table D-2. Key Threats, Plan Components, and Expected Effects on Canada Lynx

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
General loss and degradation of lynx peripheral habitat	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-01 and 02; and FW-GD-WILDL-13) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02; FW-OB-CONIF-01; and FW-GD-ASPEN-01 through 04) Timber (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Soils (FW-DC-SOIL-01, 02, 04, and 05; FW-GD-SOIL-01 through 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Riparian Management Zones (FW-DC-RMZ-01 and FW-GD-RMZ-03 through 05) Monitoring Table—Wildlife, Watershed, Forested Vegetation, and Terrestrial Vegetation, Aspen Management Approach—Wildlife 02	Ecosystem-level plan components for wildlife; terrestrial vegetation; forest vegetation (aspen and conifer); timber; soils; watershed, aquatic, and riparian ecosystems; riparian management zones; and carbon storage and sequestration would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including lynx. In particular, a guideline specific to lynx would retain some dense, early successional coniferous stands that would support prey (snowshoe hare and red squirrel populations) and provide cover for stalking prey. Retention of mature, multistory conifer stands containing woody debris and snags would provide habitat for prey, such as red squirrels, and would therefore increase foraging opportunities for dispersing lynx that infrequently travel through or temporarily reside on the Ashley National Forest.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Peripheral habitat loss and degradation through human-caused activities such as timber harvest and road construction	Timber (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Soils (FW-DC-SOIL-01, 02, 04, and 05) Wildlife (FW-GO-WILDL-02 and FW-GD-WILDL-13) Forest Vegetation (FW-OB-CONIF-01) Terrestrial Vegetation (FW-GD-VEGTER-01 through 04)	In addition to the ecosystem-level plan components that would reduce general threats to lynx habitat by maintaining habitat characteristics and connectivity (see the row above), additional components for wildlife, terrestrial vegetation, forest vegetation, timber, and soils provide direction for maintaining habitat in areas where management activities take place. Standards and guidelines for timber harvest and vegetation treatments ensure retention of a mosaic of multistory mixed conifer/mixed deciduous and dense, successional stands and snags while reducing fire intensity. Objectives provide specific and measurable strategies to move the forest composition and structure toward desired conditions and return natural fire regimes to the landscape, which further reduces the loss of habitat and promotes ecosystem resilience.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Peripheral habitat loss and degradation from ecological stressors such as climate change and spruce and pine beetle outbreaks	Forest Vegetation (FW-DC-CONIF-01 and 02) Timber (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; and FW-GD-TIMB-01 through 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01)	Ecosystem-level plan components that include desired conditions for terrestrial ecosystems would help to maintain adequate amounts of connected, resilient forests with the structural complexity to serve as peripheral habitat for lynx dispersal. These resilient forests may otherwise be lost due to climate change and other stochastic events such as high-severity fire and insect outbreaks. Guidelines to salvage dead or dying trees and mitigate forest insects or diseases would help reduce the spread of outbreaks and their threat to lynx habitat. Over time, this would help increase stand regeneration, thereby accelerating the availability of foraging habitat; maintain the availability and condition of lynx peripheral habitat; and ensure the peripheral habitat continues to provide the complex structural attributes for dispersing lynx that could infrequently move through or reside temporarily in the area.

Wolverine

Determination: It is not within the plan area's inherent capability to maintain or restore the ecological conditions to maintain a viable population of wolverine in the plan area. Nonetheless, the plan components should maintain or restore ecological conditions within the plan area to contribute to maintaining a viable population of the species within its range. A breeding population of wolverines does not occur on the Ashley National Forest (Forest Service 2006, USFWS 2013a, Christensen 2015, USFWS 2018, UDWR 2022a). Given the paucity of historical and recent wolverine occurrences on the Ashley National Forest, it is reasonable to assume that any future wolverine occurrence would be rare (McKay 1991, Forest Service 2006, Christensen 2015, UDWR 2015, UDWR 2022a). As such, it is unlikely that wolverines would be affected by land management on the forest.

However, if an individual wolverine temporarily disperses onto the Ashley National Forest and thus is potentially exposed to elements of the forest's land management, then the effect on the individual wolverine is expected to be low; this is because wolverines do not appear to be negatively affected by activities such as heavy recreation use (including winter recreation), human disturbance, infrastructure, grazing, timber harvest, and prescribed fire (USFWS 2013a, 2018). Studies have found wolverines to be present and reproducing in heavy recreational use areas, such as developed ski resorts, dispersed winter and summer recreation areas, and dispersed snowmobile areas (USFWS 2013a). Other studies have found wolverine movements increase with heavy recreation use, but they still maintain their home ranges (USFWS 2018). Regardless, plan components listed in table D-3 below, such as those for the recreation opportunity spectrum and the High Uintas Wilderness, provide areas of restricted recreation and human use, which would restrict disturbance to wildlife such as wolverine.

Additionally, plan components described in the section below will retain key ecological characteristics for transient wolverines and their forage base. This will provide the life requisites for forage species, allow movement of individual transient wolverines through the landscape, and enable a temporarily dispersing wolverine the ability to procure sufficient food.

General Key Ecological Conditions: Typical habitat for this species does not occur on the Wyoming portion of the Ashley National Forest. Ecological conditions for this species include tundra, boreal forests, and coniferous forests of western mountains; however, wolverines may use a diversity of habitats that support their prey base and carrion. The physical and ecological needs of the species can be described as large territories in relatively inaccessible landscapes. They are found at high elevations (5,906 to 11,483 feet) in habitat that provides access to a variety of food resources that vary with the seasons. Wolverine reproductive behavior is linked to both temporal features (for example, time differences in persistent snowpack, reproductive patterns, and foraging opportunities) and physical features (for example, talus slopes and rugged terrain). (Forest Service 2006, UDWR 2015, USFWS 2018)

Key Threats to Persistence: Primary threats to the species are wildland fire and climate change. Disturbance during the winter months (denning and young rearing) is another identified threat in areas where there are breeding populations (USFWS 2018).

Summary: The wolverine is a proposed species for federal listing as threatened, but the Ashley National Forest does not support a breeding population of wolverine (McKay 1991, Forest Service 2006, Berg and Inman 2010, UDWR 2015, Christensen 2015, USFWS 2018, Forest Service 2022, UDWR 2022a&b, Maxfield 2022). Wolverine has been thought to be possibly extirpated from Utah (Forest Service 2006, Christensen 2015, UDWR 2022a). However, in 2014 a wolverine was documented on the north slope of the Uintas Mountains on the Uinta/Wasatch/Cache National Forest, and possible wolverine tracks were found by the Utah Division of Wildlife Resources near Dutch John in the Flaming Gorge Ranger District

that same year (Christensen 2015, UDWR 2015). A wolverine was trapped and collared in Rich County, Utah, in March 2022 and released on the North Slope of the Uinta Mountains (UDWR 2022a). This wolverine spent a brief time in the Uinta Mountains and then traveled west and north back to the area of Rich County (within a few weeks of its capture), where the signal was lost (UDWR 2022b; Maxfield 2022). These individuals were likely transient since no other occurrences were documented in the Uinta Mountains or in Utah in the previous 30-plus years and since Utah and the Ashley National Forest are not included within the current potential extent of wolverine occurrence in North America (UDWR 2022a&b; Forest Service 2006; Berg and Inman 2010; Christensen 2015; Forest Service 2022; Maxfield 2022; USFWS 2018).

Wolverine are considered dispersers, but there has been no evidence of wolverine reproducing in Utah or the Uinta Mountains (McKay 1991, Forest Service 2006; Berg and Inman 2010; Christensen 2015; UDWR 2015, Forest Service 2022; Maxfield 2022; USFWS 2018; UDWR 2022a&b). Additionally, photographic bait stations monitored by Utah State University between 2005 and 2009 were placed throughout the Ashley National Forest, but there were no detections of wolverine (Christensen 2015). Annual winter carnivore track surveys and periodic bait camera stations were conducted on the Ashley National Forest between 2005 and 2021; they yielded no wolverine detections (Forest Service 2006, Berg and Inman 2010; Christensen 2015; Forest Service 2022; Maxfield 2022). Given that there is so little recent evidence of wolverine occurrence on the Ashley National Forest, so few historical occurrences, a span of 30-plus years of no documented wolverine occurrences in Utah, and the lack of wolverine detections during surveys on the Ashley National Forest, it is evident that a breeding population of wolverines does not occur on the Ashley National Forest (McKay 1991, Forest Service 2006, Berg and Inman 2010, UDWR 2015, Christensen 2015, USFWS 2018, Forest Service 2022, UDWR 2022a&b, Maxfield 2022). Furthermore, as stated previously, an analysis by the U.S. Fish and Wildlife Service of wolverine occurrence did not include Utah or the Ashley National Forest within the current potential extent of wolverine occurrence in North America (USFWS 2018).

A breeding population of wolverines is not considered to be within the Ashley National Forest, but individual wolverines may occasionally disperse to the Ashley National Forest. Forest management in the form of desired conditions, goals, and standards for general wildlife, terrestrial and forest vegetation, timber, soils, watersheds and aquatic ecosystems, riparian management zones, and carbon storage and sequestration would maintain ecological conditions for transient wolverines that might occasionally disperse to the Ashley National Forest.

A large portion of this species' potential habitat on the Ashley National Forest is remote, receives little human-related impacts, and likely will remain so into the future (for example, the High Uintas Wilderness). Still, forest management activities in other parts of the Ashley National Forest may affect other areas of potential wolverine habitat on the forest. Timber harvest, prescribed fire, fuels reduction treatments, and road construction may contribute to habitat degradation and fragmentation, which may limit the suitability and individuals' use of potential habitat.

Effects on potential wolverine habitat from forest management activities are primarily addressed through forestwide plan components in table D-3 below, which details plan components that address key ecological conditions for wolverine. Forestwide plan components emphasize resilient, connected forests containing the complex structural attributes for wolverine prey and dispersing wolverines that could infrequently move through or reside temporarily in the area (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04; FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02; FW-OB-CONIF-01; FW-GD-ASPEN-01 through 04; FW-ST-TIMB-01; FW-GD-TIMB-01 through 03; and FW-GD-SOIL-01 through 05).

Timber harvest and fuels reduction treatments would occur on the Ashley National Forest, but treatments would be planned in a manner to meet vegetation desired conditions, to sustain the ecological resilience of timber stands and vegetation, and to maintain structural diversity across the landscape (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03; FW-DC-SOIL-01, 02, 04, and 05; FW-GD-SOIL-01 through 05; FW-DC-FIRE-03; FW-GD-FIRE-01, 03, and 04; and FW-GD-WILDL-13). These plan components would retain wolverine prey species habitat in the plan area. A specific guideline for lynx (FW-GD-WILDL-13) would maintain a mosaic of multistory and dense, early successional coniferous and mixed coniferous/deciduous stands across the Ashley National Forest, which would also contribute to maintaining habitat for many wolverine prey species.

The forest plan identifies designated management areas (for example, the High Uintas Wilderness) and management areas (for example, recreation management areas). Management within designated management areas is generally more restrictive of management actions than in other Ashley National the Forest areas; thus, those actions are less likely to affect potential wolverine habitat in these areas than in other areas of the Ashley National Forest. The Forest Service would manage recreation management areas by all the forestwide desired conditions, standards, and guidelines previously mentioned and in table D-3 below. Thus, potential wolverine habitat would be maintained in these areas of the Ashley National Forest, as previously described. Additionally, recreation management areas do not propose any specific actions; rather, they provide a framework for evaluating future proposed actions within those areas. Thus, recreation management areas themselves do not present any actions and would not affect wolverine habitat.

Ecological stressors, such as climate change and insect and disease outbreaks, are potential threats to wolverine habitat on the Ashley National Forest (USFWS 2018); however, the implications of climate change are unclear (Halofsky et al. 2018a, 2018b; USFWS 2018). A reduction in deep snow due to climate change might decrease suitability for wolverines on the Ashley National Forest. Increases in the loss of mature trees and fragmentation caused by wildfire could reduce habitat availability by reducing habitat for prey and therefore foraging opportunities.

Currently, most of the landscape is not resilient to large, high-intensity fire and is susceptible to drought and insect and disease outbreaks. Conifer mortality associated with insects tends to increase whenever annual precipitation is considerably less than the historical average (drought). The beetle epidemic has likely decreased some wolverine habitat on the Ashley National Forest; however, wolverine habitat is likely to persist as the conifer stands affected by the beetle epidemic regenerate over time. As this occurs, young, regenerating conifer stands, as well as snags falling to the forest floor over time, are likely to increase. These components would provide habitat for foraging that might be used by dispersing wolverines that move through potential habitat (USFWS 2018). However, moisture stress and the frequency and severity of bark beetle outbreaks are projected to increase with increasing temperatures, resulting in widespread tree mortality (Halofsky et al. 2018a, 2018b).

Threats to wolverine habitat from ecological stressors are primarily addressed through the forestwide plan components in table D-3 below. General guidelines for wildlife aim to maintain at-risk species habitat on the Ashley National Forest by providing necessary habitat features and connectivity. Achieving desired conditions in terrestrial and forest vegetation would reduce threats from ecological factors by increasing the resiliency of ecosystems to stressors such as fire, insects, pathogens, and climate variability (FW-DC-VEGTER-01 to 09).

Additionally, multiple plan components emphasize a timber harvest program that would promote ecosystem health, sustainability, and resilience by modifying the composition, density, structure, and spatial arrangement of vegetation to achieve desired conditions. Such treatments may prevent future

adverse effects on wolverine habitat associated with climate change, widespread tree mortality, and wildfire. A specific guideline and standard to reduce tree susceptibility to bark beetle attack (FW-ST-TIMB-06 and FW-GD-CONIF-01) would help reduce the loss of habitat for wolverines and their prey from beetle kill.

Desired conditions for diverse and productive plant communities to maintain carbon stocks (FW-DC-CARBON-01) might also provide habitat features used by wolverines, such as resilient, connected forests with structural complexity. These desired conditions also would support carbon stability, which may ultimately help mitigate climate-related habitat changes and reduce the potential for a loss of persistent snowpack. Incorporating best available science and guidance in forest management (FW-GO-CLIM-01) would improve the resilience of habitat to climate change, thereby reducing the threat of stand-replacing fire, changes in the distribution of spruce and fir forests, and the loss of persistent snowpack. This would ultimately increase forest resilience and connectivity, which would continue to provide habitat characteristics for dispersing wolverines and their prey.

Table D-3. Key Threats, Plan Components, and Expected Effects on Wolverine

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
General loss and degradation of wolverine habitat	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-01 and 02; and FW-GD-WILDL-13) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02; FW-OB-CONIF-01; and FW-GD-ASPEN-01 through 04) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; and DA-SUIT-HUW-01 and 02) Timber (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Soils (FW-DC-SOIL-01, 02, 04, and 05; FW-GD-SOIL-01 through 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Riparian Management Zones (FW-DC-RMZ-01 and FW-GD-RMZ-03 through 05) Management Approach—Wildlife 02	Ecosystem-level plan components for wildlife; terrestrial vegetation; forest vegetation (aspen and conifer); High Uintas Wilderness; timber; soils; watershed, aquatic, and riparian ecosystems; riparian management zones; and carbon storage and sequestration would emphasize maintenance of key ecological conditions that are important for many wildlife species, including wolverines and their prey. In particular, the retention of mature, multistory conifer stands containing woody debris and snags would provide habitat for wolverine prey species.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Wolverine habitat degradation and fragmentation through human-caused activities such as timber harvest and road construction	Timber (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; and FW-GD-TIMB-01 through 03) Soils (FW-DC-SOIL-01, 02, 04, and 05) FW-DC-FIRE-03; FW-GD-FIRE-01, 03, and 04 Wildlife (FW-GO-WILDL-02 and FW-GD-WILDL-13). Forest Vegetation (FW-OB-CONIF-01) Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Recreation Opportunity Spectrum (FW-GD-ROS-01)	In addition to the ecosystem-level plan components that would reduce general threats to wolverine habitat by maintaining habitat characteristics and connectivity (see the row above), additional components for wildlife, terrestrial vegetation, forest vegetation, timber, and soils provide direction for maintaining habitat in areas where management activities take place. Standards and guidelines for timber harvest and vegetation treatments ensure retention of a mosaic of multistory mixed conifer/mixed deciduous and dense, successional stands and snags while reducing fire intensity. Objectives provide specific and measurable strategies to move the forest composition and structure toward desired conditions and to return natural fire regimes to the landscape, which further reduces the loss of habitat and promotes ecosystem resilience.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss and degradation from ecological stressors such as climate change and spruce and pine beetle outbreaks	Forest Vegetation (FW-DC-CONIF-01 and 02) Timber (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01)	Ecosystem-level plan components that include desired conditions for terrestrial ecosystems, including maintaining carbon stocks and adapting to climate change, would help to maintain adequate amounts of connected, resilient forests with the structural complexity to serve as wolverine habitat, should one temporarily disperse onto the Ashley National Forest. These resilient forests may otherwise be lost due to climate change and other random events, such as high-severity fire and insect outbreaks. Guidelines to salvage dead or dying trees and to mitigate forest insects or diseases would help reduce the spread of disease and insect outbreaks. This would help maintain the availability and condition of habitat for wolverine prey species.

Rocky Mountain bighorn sheep

Determination: The ecosystem plan components may not provide the ecological conditions necessary to maintain a viable population of the Rocky Mountain bighorn sheep in the plan area. Therefore, additional species-specific plan components have been provided. The combination of ecosystem and species-specific plan components should provide the ecological conditions necessary to maintain a viable population of the Rocky Mountain bighorn sheep in the plan area.

General Key Ecological Conditions: Key ecological conditions include open habitat types (high alpine to lower grasslands) with adjacent steep, rocky areas for escape and safety. Habitat is associated with early vegetation seral stages and characterized by rugged terrain, including canyons, gulches, talus cliffs, steep slopes, mountaintops, and river benches. Connectivity of habitats may also be important to bighorn sheep (UDWR 2018, UDWR 2019, Forest Service 2017a, Forest Service 2021).

Key Threats to Persistence: Threats to the species' persistence include habitat loss and degradation from human-caused disturbance, conifer encroachment, and potential cheatgrass (*Bromus tectorum*) invasion; climate change effects that exacerbate the invasion of noxious weeds; and transmission of respiratory pathogens from domestic sheep and between individual bighorn sheep (UDWR 2018, UDWR 2019, Forest Service 2017a, Forest Service 2021).

Summary: The bighorn sheep population on the Ashley National Forest consists of five interconnected herds in the Uinta Mountains, which are primarily in the northeast portion of the plan area, and the Avintaquin herd, which is on western side of the South Unit of the plan area (UDWR 2018, UDWR 2019, Forest Service 2021). All six herds are the result of reintroduction efforts; over time, they have expanded their range beyond the areas where they were introduced (UDWR 2018, UDWR 2019, Forest Service 2021). The Avintaquin herd population estimate is approximately 20 animals, and the combined herd estimate for the five interconnected herds of the Uinta Mountains is 164 individuals (UDWR 2018, UDWR 2019, Forest Service 2020, Forest Service 2021). These herds have fluctuated over time, have generally declined since 2009, but appear to have stabilized in recent years (UDWR 2019, Forest Service 2021). The fluctuations (increases and decreases) are due to several factors, but the periodic decreases are due primarily to disease and predation (UDWR 2019, Forest Service 2021).

Habitat conditions on the Ashley National Forest are generally in satisfactory condition; however, conifer encroachment occurs in all landtype associations (LTAs) where habitat occurs. Cheatgrass invasion has also occurred in some areas of the lower-elevation LTAs. Connectivity of open habitat associated with steep, rocky terrain is sustainable with habitat improvement projects that reduce conifer encroachment and cheatgrass invasion (UDWR 2019, Forest Service 2017a, Forest Service 2021).

Ecosystem-level plan components listed in table D-4 would maintain or restore the bighorn sheep habitat's ecological conditions by setting desired conditions for the Ashley National Forest to ensure diversity and persistence of plants, wildlife, and their habitats (FW-DC-WILDL-01-03 and FW-DC-VEGTER-01-09). Components would also help maintain or restore habitat by addressing and reducing the threat of habitat degradation from ecological stressors (conifer encroachment, noxious weed invasions, and climate change). Plan components for terrestrial vegetation include numerous measures that would reduce the potential for new noxious weed establishment. Examples include using native plant materials to meet desired condition criteria, where possible; limiting the use of nonnative plant materials, seeding disturbed areas in and next to plant communities that are susceptible to invasive plants; and incorporating noxious weed and invasive species management (FW-DC-VEGTER-05, 06, and 08; FW-GD-VEGTER-01 through 04).

Plan components for non-forest vegetation would limit conifer encroachment and aim to improve or maintain the desired condition of areas threatened by conifer encroachment or invasive plants or that are in degraded condition (FW-DC-VEGNF-01; FW-DC-ALPINE-01; and FW-OB-VEGNF-01 and 02). Reducing canopy cover in the Anthro Plateau LTA (FW-OB-VEGNF-02) would also improve habitat conditions for bighorn sheep by creating more open habitat areas that bighorn sheep rely on for visibility (UDWR 2018). Achieving overall desired conditions would improve habitat conditions for bighorn sheep by creating vegetation communities with low densities or an absence of noxious weeds and that are resilient to new disturbances, and by providing necessary habitat features and connectivity (UDWR 2018). Moving fire disturbance regimes toward their natural frequency and magnitude would maintain or improve habitat conditions. This is because wildfire typically improves bighorn sheep habitat by reducing overgrowth and creating open habitat with increased visibility (UDWR 2018; UDWR 2019, Forest Service 2017a, Forest Service 2021).

Human-caused activities, such as energy and mineral development and livestock grazing, can degrade habitat conditions for bighorn sheep by fragmenting habitat, reducing forage, and creating surface disturbance that increases the risk of noxious weed establishment. These threats are primarily addressed through forest-wide plan components for wildlife, energy and minerals, and grazing (table D-4) that would reduce or prohibit surface-disturbing activities and/or development in sensitive habitat, limit forage utilization, and ensure livestock grazing is compatible with ecological functions and processes (FW-GD-WILDL-01; FW-GD-WILDL-15; FW-DC-GRAZ-02; FW-DC-MINL-02; FW-GD-GRAZ-01 and 02; FW-ST-MINL-02; and FW-GD-MINL-01, 03, and 05).

The bighorn sheep population on the Ashley National Forest has fluctuated over time (UDWR 2018, UDWR 2019, Forest Service 2020, Forest Service 2021). Decreases in numbers have been due to predation and disease (UDWR 2018, UDWR 2019, Forest Service 2020, Forest Service 2021). Predation is a state issue, and the State of Utah actively manages cougars for the benefit of bighorn sheep (UDWR 2018, UDWR 2019, Forest Service 2020, Forest Service 2021). Mortality by disease has primarily been due to respiratory pathogens that cause bacterial pneumonia (UDWR 2018, UDWR 2019, Forest Service 2020, Forest Service 2021). Respiratory pathogens can be transferred from domestic sheep to bighorn sheep if contact between the species occurs, as well as between bighorn sheep themselves (UDWR 2018, UDWR 2019, Forest Service 2020, Forest Service 2021). Other species such as mountain goats may also carry pathogens that cause respiratory disease in bighorn sheep (Highland et al. 2018; Wolff et. al. 2016; Wolff 2018). Mountain goats often overlap bighorn sheep habitat and occur in high, rugged terrain, such as the Uintas Mountains. A study in Nevada found that mountain goats may have been a carrier of pathogens that caused a pneumonia outbreak in bighorn sheep in the same area (Wolff et. al. 2016; Wolff 2018). A mountain goat harvested in 2018 was the first mountain goat to test positive with *Mycoplasma ovipneumonia* in the Uinta mountains and the prevalence of the pathogen in the mountain goat herds in the Uinta mountains is uncertain (UDWR 2019b). However, the likelihood of bighorn sheep contact with other species such as mountain goats and the potential for pathogen transmission between mountain goats and bighorn sheep on the Ashley National Forest are uncertain (UDWR 2019, Forest Service 2021). Domestic sheep and goats on private lands and Bureau of Land Management lands may also be potential vectors of pathogen transfer to bighorn sheep that use the Ashley National Forest, which could affect bighorn sheep viability (Forest Service 2021). Although the Ashley National Forest does not have any authority over actions on other lands or with potential pathogen transfer between wildlife species, such as between mountains goats and bighorn sheep, several plan components contribute to the viability of bighorn sheep by minimizing the risk of contact between domestic sheep on the Ashley National Forest and bighorn sheep. Forest plan components specific to bighorn sheep would minimize the threat of pathogen transfer in several ways. A goal would minimize contact between bighorn sheep and domestic sheep through collaboration with the State of Utah, utilizing memorandums of understanding, and

applying site-specific management strategies described in domestic sheep permit annual operating instructions that strive to minimize the risk of contact between the two species (FW-GO-WILDL-03). Currently, there is one statewide memorandum of understanding and one site-specific memorandum of understanding between the State of Utah and the Forest Service, which are being utilized in management of bighorn sheep on the Ashley National Forest to help minimize the risk of contact between domestic sheep and bighorn sheep.

The forest plan components include another goal to coordinate with State agencies in wildlife management (FW-GO-WILDL-02). This collaboration between the State agencies and the Forest Service would continue in the management of bighorn sheep and its habitat on the Ashley National Forest. The plan components also include a guideline that would provide separation of domestic and bighorn sheep for permits waived without preference by (1) mitigating the threat of pathogen transfer from domestic sheep and goats to bighorn sheep, consistent with the most current State big horn sheep management plan; (2) mitigating the threat of pathogen transfer from domestic sheep or domestic goats to bighorn sheep in accordance with reasonable management guidelines pursuant to a new site-specific memorandum of understanding; (3) leaving the allotment vacant of domestic sheep and goats; (4) working with the State of Utah to remove or translocate bighorn sheep; or (5) implementing another method that would provide separation of the species or that would reduce the threat of pathogen transfer from domestic sheep to bighorn sheep (FW-GD-WILDL-09). The plan components would also limit authorization of new permitted domestic sheep or goat allotments unless the Ashley National Forest determines, based on local information and the best available science, that separation of the allotment from bighorn sheep will be obtained (FW-GD-WILDL-10). When implemented, these measures would help reduce the risk of contact between domestic and bighorn sheep and help maintain bighorn sheep persistence in the plan area.

Bighorn sheep could become more susceptible to disease when stressed, but it appears that bighorn sheep may be somewhat tolerant of recreation and human disturbance (Papouchis et al. 2001; MacArthur et al. 1982; Longshore et al. 2013; Wiedmann and Bleich 2014; Toweill and Geist 1999). For example, bighorn sheep consistently use areas along Highway 191, Forest Service roads, and campgrounds near Flaming Gorge, and they exhibit undisturbed behavior. Likewise, the Utah Division of Wildlife Resources unit management plan for bighorn sheep in this area indicates that bighorn sheep in the area are not disturbed by recreational activities (UDWR 2019). Although bighorn sheep on the Ashley National Forest appear to be tolerant of recreational activities, plan components would provide primitive settings and maintain the High Uintas Wilderness with relatively low recreation and restricted motorized travel, thereby minimizing disturbance to much of bighorn sheep habitat (FW-DC-ROS-05 and 06; FW-GD-ROS-01; DA-ST-HUW-01 through 04; DA-GD-HUW-01; and DA-SUIT-HUW-01 and 02). Additionally, wildlife guidelines would minimize disturbance to migrating and wintering bighorn sheep and their wintering and connective habitats (FW-GD-WILDL-01 and FW-GD-WILDL-15).

Table D-4. Key Threats, Plan Components, and Expected Effects on Bighorn Sheep

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss and degradation from conifer encroachment, noxious weed invasions, and climate change	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-02 and 03; and FW-GD-WILDL-01, 09, 10, and 15) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Non-Forest Vegetation (FW-DC-VEGNF-01, FW-DC-ALPINE-01, and FW-OB-VEGNF-01) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01)	Ecosystem-level plan components for wildlife, terrestrial vegetation, non-forest vegetation, and carbon storage and sequestration would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including bighorn sheep. Components to maintain the ecological function of non-forest vegetation, reduce or eliminate noxious weed establishments, and increase habitat resilience to disturbances, such as nonnative plant invasions, would help alleviate the threat of habitat loss from cheatgrass invasions, conifer encroachment, and climate change.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss and degradation from human-caused disturbance	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-02; and FW-GD-WILDL-01 and 15) Livestock Grazing (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-DC-MINL-02, 11, and 12; FW-ST-MINL-02; and FW-GD-MINL-01, 03, and 05) Recreation Opportunity Spectrum (FW-DC-ROS-05 and 06; FW-GD-ROS-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; DA-SUIT-HUW-01 and 02)	Forest plan components for wildlife would minimize disturbance to migrating and wintering bighorn sheep and their wintering and connective habitats. Forest plan components for energy and minerals would minimize disturbance to bighorn sheep and habitat loss or degradation by avoiding development in recommended wilderness areas and research natural areas; imposing timing restrictions during sensitive time periods, such as lambing; and avoiding or minimizing adverse environmental impacts. Components for grazing would further reduce habitat degradation from human-caused activities by limiting forage utilization, thereby maintaining forage for native ungulates such as bighorn sheep. Although bighorn sheep on the Ashley National Forest appear to be tolerant of recreation, components for recreation would provide primitive settings and maintain the High Uintas Wilderenss with relatively low recreation and restricted motorized travel, thereby minimizing disturbance to much of bighorn sheep habitat.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Respiratory pathogen transmission from domestic sheep	Wildlife (FW-GO-WILDL-02 and 03; FW-GD-WILDL-09 and 10)	Forest plan components specific to bighorn sheep would reduce the risk of contact between domestic sheep and bighorn sheep through collaboration with the State of Utah, utilization of memorandums of understanding, and application of the site-specific management strategies described in domestic sheep permit annual operating instructions. Forest plan components would also provide separation of domestic sheep and bighorn sheep when a permit is waived without preference, and plan components would restrict new domestic sheep permits from being authorized unless the Ashley National Forest determines, based on local information and the best available science, that separation of the allotment from bighorn sheep will be obtained.

Fringed myotis

Determination: The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of the fringed myotis in the plan area. Nonetheless, additional species-specific plan components have been provided for added clarity or measures of protection, or both.

General Key Ecological Conditions: Key ecological conditions include middle elevations in desert, riparian, grassland, and woodland habitats (Oliver 2000, Keinath 2004, UDWR 2015, Forest Service 2017a). The fringed myotis roosts in a variety of roosting structures, most often associated with rock crevices, conifer snags, abandoned mines, caves, and buildings (Keinath 2004, UDWR 2015). In forests, it is reliant on the availability of larger trees that provide crevices or cavities for roosting (Keinath 2004, Forest Service 2017a). The availability of caves (for hibernacula and maternity colonies) is key for the sustainability of this species on the landscape (Keinath 2004, UDWR 2015, Forest Service 2017a, NatureServe 2022b).

Key Threats to Persistence: The key threats to this species' persistence are loss of natural roost sites, such as large trees and snags, from spruce and pine beetle outbreaks and tree or snag removal; degradation of riparian habitats; climate change; human disturbance to hibernacula and maternity sites in caves; and the spread of white-nose syndrome (Oliver 2000, Keinath 2004, Forest Service 2017a, NatureServe 2022b).

Summary: There are 25 known fringed myotis occurrences on the Ashley National Forest within the last 20 years. Like most forest-dwelling bat species, the fringed myotis mainly uses snags as roosting structures in forested habitat (Keinath 2004, Forest Service 2017a, NatureServe 2022). Pinyon-juniper habitats are advancing in all LTAs, and beetles have affected conifers in all LTAs associated with this species' habitats. With a few exceptions, riparian habitats in associated LTAs are generally in satisfactory condition (Forest Service 2017a). These few exceptions are trending toward satisfactory condition. This species' habitats are likely to remain sustainable over time if satisfactory conditions are maintained (Keinath 2004, Forest Service 2017a, NatureServe 2022b).

Because large trees and snags are important roosting features for bats, retaining these features across the Ashley National Forest would help maintain fringed myotis habitat (Keinath 2004, Forest Service 2017a, NatureServe 2022b). Wildlife guideline FW-GD-WILDL-02 would retain an average of 60 snags per 10 acres when implementing large vegetation treatments. Ecosystem-level plan components for terrestrial vegetation would maintain or improve heterogeneity, connectivity, and retention of key structural elements of terrestrial vegetation, including large trees and snags (FW-DC-VEGTER-01 through 09). Specifically, maintaining a variety of seral stages across the landscape and improving ecosystem resiliency would help retain roosting sites that might otherwise be lost to disturbances. Desired conditions to support native vegetation communities that provide foraging habitat for native pollinator species would increase foraging opportunities for the fringed myotis, which are insectivorous (FW-DC-VEGTER-09 and FW-GD-VEGTER-01).

Plan components would also help sustain habitat by helping to ensure fringed myotis habitat remains resilient to climate change. Incorporating best available science and guidance in forest management would improve the habitat's resilience to climate change. This would ultimately reduce the threat of habitat loss, particularly loss of natural roost sites such as large trees and snags. This would come about by increasing forest resilience and allowing it to continue to provide habitat characteristics for the fringed myotis, such as larger trees that provide crevices or cavities for roosting. Maintaining carbon stocks would support carbon stability, which may also help mitigate climate-related habitat changes. Desired conditions for watershed, aquatic, and riparian ecosystems would ensure that watersheds and watershed

features are resilient to disturbance, including hotter and drier climates, and would continue to provide open water needed by the fringed myotis, particularly lactating females (Adams 2010).

Ecosystem-level plan components for watershed, aquatic, and riparian ecosystems; riparian management zones; and livestock grazing would help alleviate the threat of riparian habitat degradation. These components would do this by setting desired conditions for watersheds that provide healthy and functioning aquatic, riparian, upland, and wetland ecosystems and by setting objectives for improving riparian habitat conditions through restoration projects (FW-DC-WATER-01, 03, 04, and 06 through 10; FW-OB-WATER-01 and 03; FW-GD-WATER-02; FW-DC-RMZ-01 and 02; and FW-GD-RMZ-01 and 02). For example, projects to improve habitat conditions for priority watersheds and groundwater-dependent ecosystems would improve habitat conditions by increasing the availability of functioning riparian corridors that offer safe passageways for bats traveling from roosting sites to foraging grounds (Keinath 2004). Improving or protecting riparian and wetland habitats would increase foraging opportunities. This is because locations near water support an abundant source of insects for food.

Hibernacula and maternity sites (caves) are critical habitat components for this species (Keinath 2004, Forest Service 2017a, NatureServe 2022b). Caves on the Ashley National Forest are generally protected and are in satisfactory condition (Forest Service 2017a). However, disturbance from future mining operations and recreation may pose a risk factor at maternity or roosting sites. Guidelines for wildlife would alleviate the threat of disturbance to hibernacula and maternity sites by ensuring management activities avoid, minimize, or mitigate disturbance to hibernating bats and bat maternity colonies and by closing mines or caves with suitable habitat for bats using bat-friendly devices (FW-GD-WILDL-04 and 05; FW-DC-GEOL-05).

Restricting human access at roost sites is necessary to avoid bat abandonment; this is because bats are sensitive to roost disturbance and human handling. This would go a long way toward maintaining the species' persistence, particularly as survival of reproductive females is the most important contributor to population viability. Potential management approaches, including restricting access to caves and mines using bat-friendly gates or other means to alleviate disturbance at hibernacula sites, would help reduce this human threat (FW-GD-WILDL-05).

Plan components for energy and minerals and geologic resources and hazards would further reduce the chance of disturbance to hibernating bats. These components would do this by avoiding environmental impacts by minimizing the need for storage pits, which bats might inadvertently inhabit, and protecting cave and other underground areas (for example, by avoiding ground-disturbing activities; FW-DC-MINL-02; FW-ST-MINL-02; and FW-GD-MINL-02, 03, 05). These components would ensure undisturbed habitat for native bat species during maternity and hibernation periods.

One of the greatest threats to North American myotis species is white-nose syndrome (Forest Service 2017a, NatureServe 2022b). White-nose syndrome is caused by a fungus that persists in cold cave environments and afflicts hibernating bats. White-nose syndrome is a potential future threat that has not yet been detected in Utah. The fringed myotis is not known to be affected by white-nose syndrome; however, white-nose syndrome has devastated other related myotis populations in the eastern United States (NatureServe2022b). The fringed myotis use of mines and caves for hibernacula makes it susceptible to the disease, if the disease were to become established in the plan area; the disease might cause devastating impacts on this already declining species.

Since white-nose syndrome can be spread via humans entering caves, restricting human access to caves would reduce the potential for the unintentional invasion of this disease into bat populations on the Ashley National Forest (FW-GD-WILDL-04 and 05; FW-DC-GEOL-05). Plan components to monitor

for white-nose syndrome detections in bat hibernacula, restrict human access in caves, and ensure the threats of white-nose syndrome to bats are low would reduce the potential contamination of caves and mines from diseases and the introduction or spread of white-nose syndrome. Additionally, management approach wildlife 01 would prevent spread onto the Ashley National Forest by considering preventive measures, such as cave closures or decontamination procedures for those entering caves, to minimize the risk of white-nosed syndrome spreading to bats on the Ashley National Forest, if the disease is detected within 50 miles of the Ashley National Forest.

Table D-5. Key Threats, Plan Components, and Expected Effects on Fringed Myotis

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Loss of natural roost sites, such as large trees and snags, from spruce and pine beetle outbreaks and tree or snag removal	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-02; and FW-GD-WILDL-02, 04, and 05) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Forest Vegetation (FW-DC-PJ-01 and FW-GD-PJ-01) Non-Forest Vegetation (FW-DC-NF-01, FW-DC-SAGE-01, FW-DC-SAGE-02, FW-DC-SHRUB-01, and FW-OB-VEGNF-01)	Ecosystem-level plan components for wildlife, terrestrial vegetation, forest vegetation, and non-forest vegetation would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including the fringed myotis. These plan components support ecosystems and habitat conditions that provide essential habitat characteristics for native species, habitat connectivity, vegetation diversity, and ecological integrity and resilience. They emphasize heterogeneity, connectivity, and retention of key structural elements, including large trees and snags, which are important roosting features for bats.
Riparian degradation	Watershed, Aquatic, and Riparian Ecosystems (FW-DC-WATER-01, 03, 04, and 06 through 10; FW-OB-WATER-01 and 03; and FW-GD-WATER-02) Riparian Management Zones (FW-DC-RMZ-01 and 02; FW-GD-RMZ-01 and 02)	Ecosystem-level plan components for watershed, aquatic, and riparian ecosystems; riparian management zones; and livestock grazing would help alleviate the threat of riparian habitat degradation. They would do this by setting desired conditions for watersheds that provide healthy and functioning aquatic, riparian, upland, and wetland ecosystems and by setting objectives for improving riparian habitat conditions through restoration projects.
Disturbance to hibernacula and maternity sites; spread of white-nose syndrome	Wildlife (FW-GD-WILDL-04 and 05) Geologic Resources and Hazards (FW-DC-GEOL-03 and 05; FW-GD-GEOL-03 and 04) Energy and Minerals (FW-DC-MINL-02; FW-ST-MINL-02; and FW-GD-MINL-02, 03, and 05) Monitoring Table—Mon-WILDL-04 Management Approach Wildlife 01	Guidelines specific to bats would alleviate the threat of disturbance to hibernacula and maternity sites by ensuring management activities avoid, minimize, or mitigate disturbance to hibernating bats and bat maternity colonies. Guidelines would also alleviate the threat of disturbance by closing mines or caves with suitable bat habitat using bat-friendly devices.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Climate change	Watersheds (FW-DC-WATER-01 and 03) Terrestrial Vegetation (FW-DC-VEGTER-04) Maintaining Carbon Stocks (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01)	Forestwide plan components that include desired conditions for terrestrial ecosystems, carbon storage, and adapting to climate change would help to ensure fringed myotis habitat remains resilient to climate change. Incorporating best available science and guidance in forest management would improve the resilience of the habitat to climate change. This would ultimately reduce the threat of habitat loss, particularly the loss of natural roost sites such as large trees and snags.

Pygmy rabbit

Determination: The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of the pygmy rabbit in the plan area. Nonetheless, additional species-specific plan components have been provided for added clarity or measures of protection, or both.

General Key Ecological Conditions: Key ecological conditions include dense stands of big sagebrush growing in deep, loose soils. Pygmy rabbit habitat is defined in large part by the type of vegetation (sagebrush and grassland) and its distribution on the landscape. The quality of habitat is defined by the density and structure stage of big sagebrush. The size and quantity of habitat patches likely define the quality and quantity of habitat across the landscape. Connectivity of these habitat patches may be important to population expansion. (Forest Service 2017a, Keinath and McGee 2004; USFWS 2010; Hayes 2018, NatureServe 2022a).

Key Threats to Persistence: Key threats to this species' persistence are habitat loss and degradation from grazing, energy development, wildfire, and invasive species (Keinath and McGee 2004; USFWS 2010; Hayes 2018). Climate change could exacerbate the invasion of noxious weeds such as halogeton (*Halogeton glomeratus*) and cheatgrass. Cheatgrass might reduce habitat quality and might also increase the fire return interval, which would reduce habitat for this species (Forest Service 2017a, NatureServe 2022a).

Summary: There are nine known pygmy rabbit occurrences on the Ashley National Forest within the last 20 years. These occurrences have been on the Wyoming side of the Flaming Gorge National Recreation Area (Forest Service 2017a). The pygmy rabbit is associated with sagebrush ecosystems because it is highly dependent on sagebrush for food and shelter throughout the year. Sagebrush communities within the Green River LTA have been invaded or are at risk of invasion of cheatgrass or halogeton, or both (Forest Service 2017a). This species' habitat is likely to remain sustainable over time if cheatgrass expansion is deterred or slowed (Forest Service 2017a).

Ecosystem-level plan components would help achieve habitat sustainability by including numerous measures to reduce invasive species establishment and/or expansion (for example, by using native plant materials to meet desired condition criteria where possible, limiting use of use nonnative plant materials, seeding disturbed areas in and next to plant communities that are susceptible to invasive plants, and incorporating noxious weed and invasive species management; FW-DC-VEGTER-05, 06, and 08; FW-GD-VEGTER-01 through 04).

Plan components for non-forest vegetation would limit conifer encroachment and aim to improve or maintain the desired condition of areas threatened by conifer encroachment or invasive plants or those that are in degraded condition (FW-DC-VEGNF-01 and FW-OB-VEGNF-01). Management actions would also include components to improve the resistance and resiliency of ecosystems to disturbances such as wildfire and invasive species (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04). These components would work in concert to reduce the threat of habitat loss from wildfire and increased invasion of nonnative grasses in burned areas; deterring cheatgrass expansion is key to sustaining pygmy rabbit habitat on the Ashley National Forest (Forest Service 2017a).

The density of sagebrush for pygmy rabbit habitat varies in the literature from 20 to 30 percent (Keinath and McGee 2004; USFWS 2010; Hayes 2018). As such, a specific guideline for the pygmy rabbit would design vegetation treatments to maintain interconnected patches (average of one-half acre in size) of tall dense sagebrush (average of 20+ percent canopy cover or the highest percent canopy cover available if 20 percent is not achievable in the area) (FW-GD-WILDL-07). Desired conditions for sagebrush and desert

shrub ecosystems would ensure sagebrush landscapes consist of variable ratios of shrub canopy cover that supports habitat needs for known sagebrush-obligate wildlife species, such as pygmy rabbits (FW-GD-WILDLI-11, FW-DC-SHRUB-01, and FW-DC-SAGE-01 and 02). Desired conditions for soil quality and stability would provide a functional foundation for vegetation and burrowing sites (FW-DC-SOIL-01 through 04). These components would aid in the persistence of pygmy rabbit populations on the Ashley National Forest by helping to maintain or improve habitat connectivity, which is an important habitat feature that may aid in population expansion, as well as sagebrush cover, which defines the quality of pygmy rabbit habitat (Forest Service 2017a, Keinath and McGee 2004; USFWS 2010; Hayes 2018).

Human-caused activities, such as energy and mineral development and livestock grazing, can degrade habitat conditions for pygmy rabbit by fragmenting habitat and creating surface disturbance, which increases the risk of noxious weed establishment and compacts soils. These threats are primarily addressed through forestwide plan components for wildlife, energy and minerals, and grazing (table D-6) that would reduce or prohibit surface-disturbing activities or development in sensitive habitat, or both; limit forage utilization; and ensure livestock grazing is compatible with ecological functions and processes (FW-DC-GRAZ-02, FW-DC-MINL-02, FW-GD-GRAZ-01 and 02, FW-ST-MINL-01 and 02, and FW-GD-MINL-03). Restoring or maintaining the ecological function, integrity, and resilience of non-forest vegetation would improve or maintain habitat for the pygmy rabbit by reducing the threat of invasive plants, which is key to sustaining habitat (Forest Service 2017a, Keinath and McGee 2004; USFWS 2010; Hayes 2018), and by restoring previously degraded conditions (FW-OB-VEGNF-01).

Table D-6. Key Threats, Plan Components, and Expected Effects on Pygmy Rabbit

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss and degradation from noxious weed invasions, conifer encroachment, wildfire, and climate change	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-02; and FW-GD-WILDL-07 and 11) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Non-Forest Vegetation (FW-DC-VEGNF-01, FW-DC-SAGE-01 and 02, FW-DC-SHRUB-01, and FW-OB-VEGNF-01) Soils (FW-DC-SOIL-01 through 04) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01) Monitoring Table—Mon-WILDL-02	Ecosystem-level plan components for wildlife, terrestrial vegetation, non-forest vegetation, and carbon storage and sequestration would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including pygmy rabbit. Included is a guideline specific to the pygmy rabbit to maintain interconnected patches of tall, dense sagebrush. Components to maintain ecological function of non-forest vegetation, reduce or eliminate noxious weed establishments, and increase habitat resilience to disturbances, such as nonnative plant invasions, would help alleviate the threat of habitat loss from cheatgrass invasions, conifer encroachment, wildfire, and climate change.
Habitat loss and degradation from human-caused activities	Wildlife (FW-GD-WILDL-07 and 11) Livestock Grazing (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-DC-MINL-02, FW-ST-MINL-01 and 02, and FW-GD-MINL-03)	Forest plan components for wildlife and energy and minerals would minimize habitat loss or degradation by avoiding development in recommended wilderness areas and research natural areas, imposing timing restrictions during sensitive time periods, and avoiding or minimizing adverse environmental impacts. Components for grazing would further reduce habitat degradation from human-caused activities by limiting forage utilization, thereby maintaining forage for native species such as pygmy rabbit.

Birds

Mexican spotted owl (MSO)

Determination: It is not within the plan area's inherent capability to maintain or restore the ecological conditions to maintain a viable population of the MSO in the plan area. Nonetheless, the plan components should maintain or restore ecological conditions within the plan area to contribute to maintaining a viable population of the species within its range. There have been no documented occurrences of this species within the plan area (neither historic or recent) and habitat for this species is very limited within the Ashley National Forest (Forest Service 2006, Christensen 2015, UFWS 2013b). Given the absence of MSO occurrences on the Ashley National Forest and habitat for the species being limited, it is reasonable to assume that the Mexican spotted owl is unlikely to be affected by land management on the forest.

General Key Ecological Conditions: Habitat for the MSO does not occur on the Wyoming portion of the Ashley National Forest, since this area is more flatland desert shrub, sagebrush mixed with some pinyon and juniper. As such, the evaluation for Mexican spotted owl will focus on the Ashley National Forest within Utah. Typical habitat for this species in Utah occurs in steep-walled rocky canyon lands. These areas typically include parallel-walled canyons up to 1.2 miles (2 kilometers) in width (from rim to rim), with canyon reaches often 1.2 miles (2 kilometers) or greater with cool north-facing aspects; canyon walls containing crevices, ledges, or caves; presence of water; clumps or stringers of mixed conifer, pine/oak, pinyon/juniper, and/or riparian vegetation; and a high percent of ground litter or woody debris (USFWS 2013b).

Key Threats to Persistence: Commercial timber harvest was the primary threat for teh MSO when it was first federally listed. However, recent stand replacing fires and climate change have generally shifted forest management in the west from a commodity focus to an emphasis on sustainable ecological function and a return toward pre-settlement fire regimes. These recent stand replacing wildfires have also caused the loss of habitat for this species. Thus, key threats to this species have now shifted away from commercial timber harvest to wildland fire and climate change. To a lesser extent, recreation may be another threat. This is because anecdotal evidence indicates that MSO in heavily used recreation areas may have more erratic movements (USFWS 2013b).

Summary: The MSO is federally listed as a threatened species. However, there are no historical occurrences of the MSO on the Ashley National Forest, and periodic surveys on the Ashley National Forest conducted in predicted habitat have not detected the species (Forest Service 2006, Christensen 2015, USFWS 2013b). Thus, there are no protected activity centers designated on the Ashley National Forest. Likewise, designated "critical habitat" for the species has not been identified within the Ashley National Forest boundaries (Forest Service 2006, Christensen 2015, USFWS 2013b).

Three models have been developed to estimate the presence of MSO habitat. The 1997 model predicts surface ruggedness (indicative of this owl's habitat) and high relief topography. This model tends to overestimate the extent of owl habitat in almost all cases throughout the state of Utah (Forest Service 2006, Christensen 2015). The 2000 model includes additional variables such as geology suitable for forming steep cliffs, aspects suitable for nesting and roosting, a radiation index to predict areas of cooler temperatures, and steep slope mixed conifer habitat (Forest Service 2006, Christensen 2015). This model may underestimate MSO habitat (Forest Service 2006, Christensen 2015). The Lewis model used several vegetative and geologic variables including: elevation, aspect, surface ratio, curvature, slope, geology, and vegetation to predict MSO habitat on the Colorado Plateau of Utah (Lewis 2014). Of these variables, elevation, surface ratio, curvature, geology, and vegetation were most important in predicting where MSOs occur (Lewis 2014). The variables curvature, which indicates the presence of canyons, and surface

ratio, which identifies steep cliffs and walls, indicated that the MSO prefers steep and narrow canyons, as opposed to flat tablelands that show little topographic variability (Lewis 2014).

Field verification of the 1997 and 2000 models on the Ashley National Forest, which followed approved U.S. Fish and Wildlife Service protocol, occurred from 2001-2006 (Forest Service 2006, Christensen 2015). The results indicated that MSO habitat does not occur on the Roosevelt/Duchesne Ranger District (RD), but limited habitat occurs on the Vernal and Flaming Gorge Ranger Districts, and that habitat for the species overall is very limited on the Ashley National Forest (Forest Service 2006, Christensen 2015). The Lewis model predicted much less habitat on the Ashley National Forest than the other two models, but nearly all the Lewis model predicted habitat falls within habitat predicted by the either the 1997 or 2000 models. Thus, prior field verification of these areas of the 1997 and 2000 models can also be extrapolated to the Lewis model. The Lewis model predicts a limited amount of high value MSO habitat on the Roosevelt/Duchesne Ranger District (Lewis 2017), however as stated above, field verification (2001-2006 and 2021-2022) of these areas indicates that either the canyons in these areas are too broad and/or were burned in the 2020 East Fork Wildfire. The Lewis model predicts limited amount of high value MSO habitat on the Vernal and Flaming Gorge Ranger Districts in Ashley Gorge, Big Brush Gorge, Little Brush Gorge, and some around Flaming Gorge (Lewis 2017). The canyon areas predicted around Flaming Gorge by the Lewis model may be too broad for typical MSO habitat, but Ashley Gorge, Big Brush and Little Brush Gorges may offer MSO habitat.

The 2012 MSO Recovery Plan states that "recent forest management now emphasizes sustainable ecological function and a return toward pre-settlement fire regimes, both of which are more compatible with maintenance of spotted owl habitat conditions than the even-aged management regime practiced at the time of listing" (USFWS 2012). Likewise, forest wide plan components in the Forest Plan would emphasize sustainable ecological function and retuning to natural fire regimes. Forest wide plan components emphasize resilient, connected forests containing structural diversity (FW-DC-VEGTER 01 through 09; FW-GD-VEGTER 01 through 04; FW-DC-ASPEN 01 and 02; FW-DC-CONIF 01 and 02; FW-OB-CONIF 01; FW-GD-ASPEN 01 through 04; FW-ST-TIMB-01 through10; FW-GD-TIMB 01 through 03; FW-GD-WILDL-13). Timber harvest and fuels reduction treatments would occur on the Forest, but treatments would be planned in a manner to meet vegetation desired conditions, to sustain the ecological resilience of timber stands and vegetation, and to maintain structural diversity across the landscape, including vegetation within the Gorges where MSO habitat may occur (FW-DC-TIMB-01 through 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03; FW-DC-SOIL-01; FW-GD-SOIL-01 through 05; FW-DC-FIRE-03; FW-GD-FIRE-01, 03, and 04; FW-GD-WILDL-13). Specifically, a guideline for lynx (FW-GD-WILDL-13) would maintain a mosaic of multistory and dense, early successional coniferous and mixed coniferous/deciduous stands across planning unit, which would also maintain structural diversity where MSO habitat may occur.

Designated Management Areas, including the Flaming Gorge NRA, would be managed by all the Forest wide desired conditions, standards, and guidelines as previously mentioned. Furthermore, management in these Designated Management Areas is generally more restrictive than other areas of the Forest. Thus, areas of MSO habitat within the Flaming Gorge National Recreation Area would also be maintained.

The areas of the Ashley National Forest that may contain MSO habitat (Ashley Gorge, Big Brush and Little Brush Gorges) occur within either the General or Backcountry Recreation Areas and as such is likely to receive some recreation use from activities such as hiking, climbing, and camping; however, the level of recreation use in these areas is moderate to light. Furthermore, much of the area in the Gorges where MSO habitat may occur do not contain roads or OHV trails, thus further limiting the likelihood of heavy recreation in those areas. Additionally, all Recreation Management Areas would be managed by all

the Forest wide desired conditions, standards, and guidelines previously mentioned. Thus, MSO habitat would be maintained in these areas of the Forest as previously described. Additionally, Recreation Management Areas would be managed as the areas currently are and do not propose any specific actions to increase recreation.

Although there are no documented occurrences of MSO on the Ashley National Forest, and it remains in question whether the species will occur on the Ashely in the future, the forest plan contains plan components, in addition to those described above, that would help protect raptors in general, including the MSO. Plan components would avoid removal and disturbance to raptor nests, and provide snags and downed woody debris for prey species (FW-GD-WILDL-02 and 03; FW-GD-SOILS-03).

Ecological stressors such as climate change, wildfire, and insect/disease outbreaks in forests are potential threats to MSO habitat (USFWS 2013b). Increases in the loss of mature trees and fragmentation caused by wildfire could reduce habitat availability by reducing habitat for prey, and therefore foraging opportunities. Currently, most of the landscape is not resilient to large, high-intensity fire, and is susceptible to drought and insect and disease outbreaks. Conifer mortality associated with insects tends to increase whenever annual precipitation is considerably less than the historical average (drought). However, moisture stress and the frequency and severity of bark beetle outbreaks are projected to increase with increasing temperatures, resulting in widespread tree mortality (Halofsky et al. 2018a, 2018b). These ecological stressors are primarily addressed through the forest wide plan components, which would include areas of the Forest that may have MSO habitat.

General guidelines for wildlife aim to maintain at-risk species habitat, which would include the MSO, on the Ashley National Forest by providing necessary habitat features and connectivity. Achieving desired conditions in terrestrial and forest vegetation would reduce threats from ecological factors by increasing the resiliency of ecosystems to stressors, such as fire, insects, pathogens, and climate variability (FW-DC-VEGTER 01 to 09). Additionally, multiple plan components emphasize a timber harvest program that promotes ecosystem health, sustainability, and resilience by modifying the composition, density, structure, and spatial arrangement of vegetation to achieve desired conditions. Achieving desired conditions would provide sustainable ecological function and a return toward pre-settlement fire regimes as recommended by the 2012 Mexican Spotted Owl Recovery Plan. Such treatments may help dampen the effects from climate change, and prevent widespread tree mortality, and wildfire. A specific guideline and standard to reduce tree susceptibility to bark beetle attack (FW-ST-TIMB-06; FW-GD-CONIF 01) would help reduce the loss of conifer trees.

Desired conditions for diverse and productive plant communities to maintain carbon stocks (FW-DC-CARBON-01) which would provide resilient, connected forests with structural complexity. These desired conditions also would support carbon stability, which may ultimately help mitigate climate-related habitat changes. Incorporating best available science and guidance in forest management (FW-GO-CLIM 01) would improve the resilience of habitat to climate change, thereby reducing the threat of stand-replacing fire, changes in the distribution of spruce and fir forests. This would ultimately increase forest resilience and connectivity, which would continue to maintain what little MSO habitat that occurs on the Ashley National Forest.

Table D-7. Key Threats, Plan Components, and Expected Effects on the Mexican spotted owl

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
General loss and degradation of Mexican spotted owl habitat	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-01 and 02; and FW-GD-WILDL-13) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02; FW-OB-CONIF-01; and FW-GD-ASPEN-01 through 04) Timber (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Soils (FW-DC-SOIL-01, 02, 04, and 05; FW-GD-SOIL-01 through 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Riparian Management Zones (FW-DC-RMZ-01 and 02; FW-GD-RMZ-03 through 05)	Ecosystem-level plan components for wildlife, terrestrial vegetation, forest vegetation, timber, non-forest vegetation, carbon storage and sequestration, and adapting to climate change would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including the Mexican spotted owl.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss and degradation from ecological stressors such as climate change and spruce and pine beetle outbreaks	Forest Vegetation (FW-DC-CONIF-01 and 02) Timber (FW-DC-TIMB-01 and 03; FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01)	Ecosystem-level plan components that include desired conditions for terrestrial ecosystems, including maintaining carbon stocks and adapting to climate change, would help to maintain adequate amounts of connected, resilient forests with the structural complexity to serve as Mexican spotted owl habitat in the limited areas where it occurs on the Ashley NF. These resilient forests may otherwise be lost due to climate change and other random events, such as high-severity fire and insect outbreaks. Guidelines to salvage dead or dying trees and to mitigate forest insects or diseases would help reduce the spread of disease and insect outbreaks. This would help maintain the availability and condition of Mexican spotted owl habitat in the limited areas where it occurs on the Ashley NF.

Black rosy-finch

Determination: The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of the black rosy-finch in the plan area. No additional species-specific plan components are warranted.

General Key Ecological Conditions: Key ecological conditions include barren, rocky, or grassy areas and cliffs among glaciers and receding snow banks, or beyond timberline. Black rosy-finch habitat is defined in large part by the type of vegetation (grassy areas in alpine) and its distribution in relation to snowfields and rock. Prey species (insects) could be defined by the structure stages of vegetation (grass and forbs). The size and quantity of habitat patches likely define the quality and quantity of habitat across the landscape. Connectivity between habitat patches may also be important for this species (UDWR 2015, Forest Service 2017a. Johnson 2020, NatureServe 2022c).

Key Threats to Persistence: There are very few known threats to this species, however climate change could reduce snowbanks that persist into the early summer (Forest Service 2017a, Johnson 2020, NatureServe 2022c). Another key threat is habitat loss and degradation from mining or improper grazing (Forest Service 2017a, Johnson 2020, NatureServe 2022c).

Summary: Within the last 20 years, there have been 85 known occurrences of black rosy-finch on the Ashley National Forest, where it is found at high elevations of associated LTAs (Forest Service 2017a). This species breeds in barren, rocky, or grassy areas and cliffs among glaciers of alpine tundra (UDWR 2015, Forest Service 2017a. Johnson 2020). It often feeds on open glaciers and snowfields, picking up insects or other wind-wafted animal matter (UDWR 2015, Forest Service 2017a. Johnson 2020, NatureServe 2022c). High-elevation, rocky areas are generally not threatened on the Ashley National Forest because they receive little human presence, and alpine areas within LTAs associated with this species are generally in satisfactory conditions (Forest Service 2017a). The species may use lower elevations of the Ashley National Forest during the winter months, but its primary habitat is the higher elevations.

Currently, there are few human-related activities that occur on or threaten this species' primary habitat; therefore, this species' habitat is likely to remain sustainable over time (Forest Service 2017a). This is especially true if its habitat continues to remain or trend toward satisfactory conditions (Forest Service 2017a). However, warming temperatures due to climate change could reduce snowbanks that persist into the early summer (Halofsky et al. 2018a, 2018b). Although the Forest Service cannot directly control the effects of climate change, plan components would help support habitat sustainability to the extent possible. Maintaining a species richness and mosaic of plant communities in alpine areas (FW-DC-ALPINE-01 and FW-DC-VEGNF-01) would provide food sources as this species mainly feeds on seeds and other vegetable matter (UDWR 2015, Forest Service 2017a. Johnson 2020, NatureServe 2022c). Desired conditions for alpine landscapes consist of a mosaic of plant communities controlled by topography, geology, aspect, snow accumulation and persistence, wind exposure, and other geomorphic features that help form habitable niches (FW-DC-ALPINE-01); these habitat niches (grassy areas in alpine among glaciers and receding snowbanks) would continue to provide breeding and wintering grounds for finches (UDWR 2015, Forest Service 2017a, Johnson 2020, NatureServe 2022c).

General guidelines for wildlife aim to maintain at-risk species persistence on the Ashley National Forest by providing necessary habitat features and connectivity (FW-DC-WILDL-01, 02, and 03). Although the pattern of black rosy-finch migration is not documented, the species may, in part, simply shift downward in elevation to use open situations such as fields and brush (UDWR 2015, Forest Service 2017a. Johnson 2020). Achieving desired conditions for vegetation resources that focus on ecological integrity and

connectivity would support habitat sustainability, possibly by enabling finches to migrate and winter in intact areas with diverse food sources. Achieving these desired conditions would also increase the resiliency of ecosystems to stressors such as fire, insects, pathogens, and climate variability (FW-DC-VEGTER-01 to 09). Incorporating best available science and guidance in forest management might improve management and therefore help improve the habitat's resilience to climate change, thereby reducing the threat of habitat loss to climate change (FW-GO-CLIM-01).

Although there are few human-caused activities that occur on or threaten this species' habitat (UDWR 2015, Forest Service 2017a. Johnson 2020, NatureServe 2022c), plan components for energy and minerals and grazing would avoid the potential for future threats by reducing or prohibiting surface-disturbing activities or development in sensitive habitat, or both; imposing timing restrictions during sensitive time periods; limiting forage utilization; and ensuring livestock grazing is compatible with ecological functions and processes (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02; FW-DC-MINL-02; FW-GO-MINL-02 and 03; and FW-GD-MINL-01, 03, and 05). Additionally, a plan component in the wildlife section (FW-GD-WILDL-14) would evaluate impacts from ground-disturbing and vegetation activities to U.S. Fish and Wildlife Service birds of conservation concern and, as practical, mitigate activities to lessen impacts to those species, which includes the black rosy-finch.

Table D-8. Key Threats, Plan Components, and Expected Effects on Black Rosy-Finch

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss from climate change	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-02; and FW-GD-WILDL-14) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Non-Forest Vegetation (FW-DC-VEGNF-01, FW-DC-ALPINE-01, FW-OB-VEGNF-01 and 02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adjusting to Climate Change (FW-GO-CLIM-01) Monitoring Table—Wildlife, Mon-WILDL02	Ecosystem-level plan components for wildlife, terrestrial vegetation, non-forest vegetation, and carbon storage and sequestration would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including the black rosy-finch. Components to achieve desired conditions for and maintain the ecological function of non-forest vegetation, particularly alpine areas, would sustain habitat by providing habitat niches used by finches. They would also help make these areas adaptable to climate change, to the extent possible.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss and degradation from human-caused activities (mining or improper grazing)	Wildlife (FW-GD-WILDL-14) Livestock Grazing (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-DC-MINL-02; FW-GO-MINL-02 and 03; FW-GD-MINL-01, 03, and 05) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; and DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	A plan component in the wildlife section would evaluate impacts from ground disturbing and vegetation activities to U.S. Fish and Wildlife Service birds of conservation concern and, as practical, mitigate activities to lessen impacts to those species, which includes the black rosy-finch. Forest plan components for energy and minerals would minimize habitat loss or degradation by avoiding development in recommended sensitive areas, such as wilderness areas and research natural areas; imposing timing restrictions during sensitive time periods; protecting ecological integrity; and avoiding or minimizing adverse environmental impacts. Components for grazing would further reduce habitat degradation from human-caused activities by stipulating that activities be compatible with ecological functions and processes. Components for the High Uintas Wilderness and the Ashley Karst National Recreation and Geological Area would limit disturbance (surface and recreational) and thus reduce otherwise potential disturbance to black rosy-finch habitats in those areas.

Greater sage-grouse

Determination: The ecosystem plan components may not provide the ecological conditions necessary to maintain a viable population of the greater sage-grouse in the plan area. Therefore, additional species-specific plan components have been provided. The combination of ecosystem and species-specific plan components should provide the ecological conditions necessary to maintain a viable population of the greater sage-grouse in the plan area.

General Key Ecological Conditions: Key ecological conditions include sagebrush and grassland habitat. Quality greater sage-grouse habitat is defined in terms of plant composition, species richness, shrub and herbaceous cover, and sagebrush seed production. The size and quantity of habitat patches likely define the quality and quantity of habitat across the landscape. Connectivity of habitats may also be important to the greater sage-grouse. (Forest Service 2015, USFWS 2015, Forest Service 2017a)

Key Threats to Persistence: Key threats to this species' persistence are habitat loss and fragmentation and degradation from human-caused disturbances, such as oil and gas development, and ecological disturbances, such as catastrophic fire and noxious weed infestations (Forest Service 2015, USFWS 2015, Forest Service 2017a). Climate change could exacerbate the invasion of noxious weeds such as halogeton and cheatgrass. It may also increase the fire frequency (Forest Service 2015, USFWS 2015, Forest Service 2017a).

Summary: There are numerous observations of greater sage-grouse on the Ashley National Forest, where the greater sage-grouse depends on sagebrush-dominated landscapes for food and cover. Although there are many locations where greater sage-grouse has been observed on the Ashley National Forest, the greater sage-grouse exists at relatively low numbers on the Ashley National Forest when compared with other areas of its range (Forest Service 2015, USFWS 2015, Forest Service 2017b). Sagebrush communities across the Ashley National Forest are generally in a satisfactory condition. Some communities within the lower-elevation/drier LTAs (South Face, Green River, and Anthro Plateau) have an invasion of cheatgrass or halogeton, or both, or are at risk of invasion (Forest Service 2017a). Conifer encroachment threatens sagebrush communities within all LTAs associated with greater sage-grouse habitat. If not deterred, cheatgrass invasion and conifer encroachment may reduce habitat quantity and quality (Forest Service 2015, USFWS 2015, Forest Service 2017a).

Forest plan components would help achieve habitat sustainability and support the species' persistence by including numerous measures to reduce invasive species establishment and expansion. Examples are using native plant materials to meet desired condition criteria, where possible; limiting use of nonnative plant materials; seeding disturbed areas in and next to plant communities that are susceptible to invasive plants; and incorporating noxious weed and invasive species management (FW-DC-VEGTER-05, 06, and 08; FW-GD-VEGTER-01 through 04). Furthermore, management actions would include components to improve the resistance and resiliency of ecosystems to disturbances such as wildfire and invasive species (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04). These components would work in concert to reduce the threat of habitat loss from wildfire and increased invasion of nonnative grasses in burned areas; deterring cheatgrass expansion is key to sustaining greater sage-grouse habitat on the Ashley National Forest (Forest Service 2015, USFWS 2015, Forest Service 2017a).

Plan components for non-forest vegetation would reduce threats to habitat by improving or maintaining the desired condition of areas threatened by conifer encroachment or invasive plants (FW-DC-VEGNF-01 and FW-OB-VEGNF-01). These would maintain greater sage-grouse habitat because conifer encroachment will eventually result in the loss of sagebrush communities if not deterred (Forest Service

2015, USFWS 2015, Forest Service 2017a). Reducing confer encroachment may also reduce predation of greater sage-grouse by reducing perch sites used by avian predators.

The 2015 Greater Sage-Grouse Forest Plan Amendment suggests improving habitats through a landscape-level conservation approach involving targeted restoration and habitat improvements (Forest Service 2015). Plan components would incorporate this guidance by maintaining or improving the ecological integrity of sagebrush ecosystems and avoiding degradation of sage-grouse habitat. Appropriate sage-grouse desired conditions, objectives, and guidelines are in the plan that maintain and/or improve sage-grouse habitat, avoid sage-grouse habitat degradation, and avoid disturbance during the critical time periods for sage-grouse. An objective to reduce mountain big sagebrush canopy cover in the Anthro Plateau LTA would enhance brood-rearing and summer habitat for greater sage-grouse (FW-OB-VEGNF-02). Desired conditions for sagebrush and desert shrub ecosystems would ensure sagebrush landscapes support the habitat needs for known sagebrush-obligate wildlife species and maintain canopy cover in greater sage-grouse seasonal habitat with less than 10 percent conifer canopy cover (FW-DS-SHRUB-01; FW-DS-SAGE-01 and 02). Also included is a component specific to greater sage-grouse that would stipulate 70 percent or more of sagebrush communities have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy cover in greater sage-grouse seasonal habitat (FW-DC-SAGE-02). A guideline in the wildlife section of the plan would avoid degradation of occupied sage-grouse habitat and provide compensatory mitigation when it is not avoidable (FW-GD-WILDL-11). These components would aid in the persistence of greater sage-grouse populations, and are consistent with and meet the intent of the 2015 Sage-Grouse Amendment; they also would maintain habitat on the Ashley National Forest by helping to maintain or improve habitat connectivity and provide suitable levels of canopy cover, which are important components of greater sage-grouse habitat (Forest Service 2015, 2017a).

Wet meadows and high-elevation riparian sites are important to many of Utah's sage-grouse populations. These areas provide cover, water, insects, and green forage, particularly during the late brood-rearing season and early fall (Arndt and Black 2011). Forest plan components would help achieve satisfactory riparian conditions by setting desired conditions for watersheds that provide healthy and functioning aquatic, riparian, upland, and wetland ecosystems. Also included are objectives for improving riparian habitat conditions through restoration projects. Improving or protecting riparian and wetland habitats would help achieve sustainability of greater sage-grouse habitat by providing food and cover used by grouse.

Human-caused disturbances continue to be a threat to greater sage-grouse and its habitat on the Ashley National Forest (Forest Service 2015, USFWS 2015, Forest Service 2017a). Activities such as energy and mineral development and livestock grazing can degrade habitat conditions for greater sage-grouse by creating surface disturbance that increases the risk of noxious weed establishment, fragmenting habitat, and compacting soils. These threats are primarily addressed through forestwide plan components for wildlife, energy and minerals, and grazing that would reduce or prohibit surface-disturbing activities, or development in sensitive habitat and during sensitive times; limit forage utilization; and ensure livestock grazing is compatible with ecological functions and processes (FW-GD-WILDL-07, 11, and 14; FW-DC-GRAZ-02; FW-DC-MINL-02 and 11; FW-GD-GRAZ-01 and 02; FW-ST-MINL-01 and 02; and FW-GD-MINL-01 through 05). Specifically, a guideline in the wildlife section of the plan avoids degradation of sage-grouse habitat, provides for compensatory mitigation if it is unavoidable, and avoids disturbance to sage-grouse during the critical time periods for the species (FW-GD-WILDL-11).

New oil and gas leases would include lease stipulations required by the 1997 Western Uinta Basin Oil and Gas Leasing Record of Decision and other leasing stipulations as appropriate (FW-ST-MINL-01 and 02); stipulations would help reduce disturbance to the greater sage-grouse and sagebrush habitat.

Monitoring for the amount and quality of occupied greater sage-grouse habitat (Monitoring Table—Wildlife, MON-WILDL-03) would also help maintain habitat if the Forest Service takes measures to improve habitat or reduce threats where habitat quality is declining.

Table D-9. Key Threats, Plan Components, and Expected Effects on Greater Sage-Grouse

Key Threats to Persistence	Plan Components That Alleviate or Eliminate Key Threats (See Forest Plan)	Effects Summary
Habitat loss and degradation from noxious weed invasions, conifer encroachment, wildfire, and climate change	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-02; and FW-GD-WILDL-14) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Non-Forest Vegetation (FW-DC-VEGNF-01, FW-DC-SAGE-01 and 02, FW-DC-SHRUB-01, and FW-OB-VEGNF-01) Riparian Management Zones (FW-DC-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01) Monitoring Table—Wildlife, MON-WILDL-02 and 03	Ecosystem-level plan components for wildlife, terrestrial vegetation, non-forest vegetation, and carbon storage and sequestration would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including the greater sage-grouse. Included is a component specific to greater sage-grouse that would stipulate 70 percent or more of sagebrush communities have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy cover in greater sage-grouse seasonal habitat. This component would maintain nesting and brood-rearing habitat in greater sage-grouse seasonal habitat. Forest plan components would achieve habitat sustainability through measures to restore, maintain, or improve the ecological integrity of sagebrush ecosystems. Reducing or eliminating noxious weed establishments, controlling conifer encroachment, and increasing habitat resistance and resilience to disturbances would help alleviate the threat of habitat loss from cheatgrass invasions, conifer encroachment, wildfire, and climate change.

Key Threats to Persistence	Plan Components That Alleviate or Eliminate Key Threats (See Forest Plan)	Effects Summary
Habitat loss and degradation from human-caused activities	Wildlife (FW-GD-WILDL-01, 07, 11, and 14) Livestock Grazing (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-DC-MINL-02 and 11; FW-ST-MINL-01 and 02; and FW-GD-MINL- 01 through 05)	Forest plan components for energy and minerals would minimize habitat loss or degradation by avoiding development in sensitive areas, imposing timing restrictions during sensitive time periods, and avoiding or minimizing adverse environmental impacts. Wildlife plan components would also avoid habitat loss or degradation by avoiding development in sensitive areas and imposing timing restrictions during sensitive time periods. Including the lease stipulations required by the 1997 Western Uinta Basin Oil and Gas Leasing Record of Decision and other lease stipulations as appropriate would help reduce disturbance to greater sage-grouse and sagebrush habitat. Components for grazing would further reduce habitat degradation from human-caused activities by avoiding impacts on sensitive resources.

Peregrine falcon

Determination: The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of the peregrine falcon in the plan area. Nonetheless, additional species-specific plan components have been provided for added clarity or measures of protection, or both.

General Key Ecological Conditions: Key ecological conditions include riparian habitats that are associated with cliffs. Peregrine falcon habitat is defined in large part by the type of vegetation (riparian) and its association with nesting habitat (cliffs) on the landscape. Prey species' habitats are defined by the structure stages of vegetation. The size and quantity of foraging habitat patches in relation to cliffs likely define the quality and quantity of habitat across the landscape. (UDWR 2015, Forest Service 2017a, White et.al. 2020, NatureServe 2022d)

Key Threats to Persistence: Key threats to this species' persistence are habitat loss and degradation from ecological disturbances, such as catastrophic fire and beetle epidemics (Forest Service 2017a, White et.al. 2020, NatureServe 2022d). Climate change could reduce the amount of riparian habitat. Noise disturbance to nesting birds and riparian habitat degradation are also threats (Forest Service 2017a, White et.al. 2020, NatureServe 2022d).

Summary: There have been numerous peregrine falcon observations from the few known eyries on the Ashley National Forest. Riparian habitats in LTAs associated with this species' habitat are generally in a satisfactory condition. A few isolated areas may not be in a satisfactory condition, but they are trending in that direction. Riparian habitat would remain sustainable if it continues in a satisfactory condition or trends toward satisfactory conditions over time (Forest Service 2017a).

As proximity to water in desert habitats promotes peregrine falcon hunting success, the peregrine falcon would benefit from actions that maintain or improve riparian habitat (UDWR 2015, Forest Service 2017a, White et.al. 2020, NatureServe 2022d). Forest plan components would help maintain or improve riparian habitat conditions by setting desired conditions for watersheds and riparian management zones that provide healthy and functioning aquatic, riparian, and wetland ecosystems and protect or enhance aquatic and riparian resource values (FW-DC-RMZ-01 and 02; FW-DC-WATER-06 and 07). Also included are objectives for improving riparian habitat conditions through restoration projects. Improving or protecting riparian and wetland habitats would increase the ability of riparian areas to support healthy and diverse prey populations. This is because intact riparian ecosystems support an abundance of small birds and mammals. This would ultimately improve habitat for falcons by increasing foraging opportunities.

Nesting habitat (cliffs) is rarely threatened, if at all, and is likely to remain sustainable over time. This is because there are few, if any, threats to this habitat on the Ashley National Forest. However, noise from human-caused activities can threaten the species' persistence by disturbing nesting birds (UDWR 2015, Forest Service 2017a, White et.al. 2020, NatureServe 2022d). Plan components would alleviate this threat by avoiding, minimizing, or mitigating human activities that might cause disturbance to peregrine falcon eyries (nest sites) (FW-GD-WILDL-08); by avoiding the removal of known raptor nests; and by avoiding disturbance near active nests during vegetation treatments (FW-GD-WILDL-03). Surveying for falcon prior to implementation of vegetation treatments would help increase the chance of successfully avoiding known nests (FW-GD-WILDL-03). These measures would support the peregrine falcon's persistence on the Ashley National Forest by reducing disturbances to nesting birds, potentially leading to increased reproductive success.

Although cliffs are generally not threatened because they are unsuitable areas for human-caused activities, such as energy development or livestock grazing, such activities could degrade habitat if carried out in

riparian habitats (UDWR 2015, Forest Service 2017a, White et.al. 2020, NatureServe 2022d). Plan components for energy and minerals and grazing would avoid or reduce the potential for threats from these activities by reducing or prohibiting surface-disturbing activities or development, or both, in sensitive habitat such as riparian management zones. These include timing restrictions, limiting forage utilization in riparian areas, and ensuring these activities are compatible with ecological functions and processes (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02; FW-DC-MINL-02; and FW-GD-MINL-01, 03, 04, and 05).

Table D-10. Key Threats, Plan Components, and Expected Effects on Peregrine Falcon

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss and degradation from catastrophic fire and beetle epidemics	Wildlife (FW-DC-WILDL-01, 02, 03; FW-GO-WILDL-02; and FW-GD-WILDL-02, 03, 08, and 14) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02; FW-OB-CONIF-01; and FW-GD-ASPEN-02 through 04) Non-Forest Vegetation (FW-DC-VEGNF-01; FW-DC-ALPINE-01; FW-DC-SAGE-01 and 02; FW-DC-SHRUB-01; and FW-OB-VEGNF-01 and 02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01) Monitoring Table—Wildlife, Mon-WILDL-02	Ecosystem-level plan components for wildlife, terrestrial vegetation, forest vegetation, non-forest vegetation, carbon storage and sequestration, and adapting to climate change would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including the peregrine falcon. Components to maintain the ecological function of forest and non-forest vegetation and to increase habitat resilience to disturbances would alleviate the threat of habitat loss from wildfire and beetle epidemics by maintaining habitat for prey species and thereby food sources for falcon.
Riparian habitat degradation	Soils (FW-DC-SOIL-01) Riparian Management Zones (FW-DC-01 and 02) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Livestock Grazing (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-DC-MINL-02; FW-GD-MINL-01, 03, 04, and 05) Monitoring Table—Mon-WILDL-02	Ecosystem-level plan components for watershed, aquatic, and riparian ecosystems; riparian management zones; and livestock grazing would help alleviate the threat of riparian habitat degradation. They would do this by setting desired conditions for watersheds that provide healthy and functioning aquatic, riparian, upland, and wetland ecosystems and by setting objectives for improving riparian habitat conditions through restoration projects. These would ultimately increase foraging opportunities for the peregrine falcon.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Disturbance from human-caused activities	Wildlife (FW-GD-WILDL-08 and 14) Livestock Grazing (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-ST-MINL-02; FW-GD-MINL-01, 03, 04, and 05)	Forest plan components for energy and minerals would minimize habitat loss or degradation by avoiding development in sensitive areas, imposing timing restrictions during sensitive time periods, and avoiding or minimizing adverse environmental impacts. Components for grazing would further reduce habitat degradation from human-caused activities by avoiding impacts on sensitive resources. A guideline specific to falcons would avoid, minimize, or mitigate human activities that might cause disturbance to peregrine falcon eyries (nest sites).

Terrestrial Invertebrates

Eureka mountainsnail

Determination: It is beyond the authority of the Forest Service or not within the inherent capability of the Ashley National Forest to maintain or restore the ecological conditions to maintain a viable population of the Eureka mountainsnail in the plan area. Nonetheless, the plan components should maintain or restore ecological conditions in the plan area to contribute to maintaining a viable population of the species within its range.

General Key Ecological Conditions: Key ecological conditions include areas with sparse plant cover at elevations of approximately 7,200 to 7,900 feet (Oliver 1999, UDWR 2020a, 2020b, NatureServe 2022e). Geologies have included both limestone and yellowish sandstone. Forest cover includes aspen, spruce, pine, and fir, while the valley floors and other open areas are grassy, with interspersed stands of sagebrush and juniper and scrub oak occur sparingly (Oliver 1999, UDWR 2020a, 2020b, NatureServe 2022e).

Key Threats to Persistence: Since this species is endemic to a handful of small areas, its population is susceptible to catastrophic events and human disturbance. Additionally, livestock grazing could threaten snail populations via trampling and destruction of habitat. Habitat loss and degradation from mining activities and wildfire are also potential threats. (Oliver 1999, UDWR 2020a, 2020b, NatureServe 2022e)

Summary: The population trend of Eureka mountainsnails on the Ashley National Forest is unknown. There are currently four widely separated populations in Utah; there are two known sites inhabited by the species on the Ashley National Forest (Oliver 1999, UDWR 2020a, 2020b, NatureServe 2022e). These sites were reported to be fenced and monitored (Forest Service 2017a); however, there have been no known observations in the past decade (Christenson 2021). The current condition of the habitat on the Ashley National Forest sites is stable and trending toward desired conditions (Forest Service 2017a).

Because only a small number of populations are known, the Eureka mountainsnail is susceptible to catastrophic events, such as wildfire (UDWR 2020a, 2020b, NatureServe 2022e). Achieving desired conditions for vegetation resources would reduce threats from ecological factors by increasing the resiliency of ecosystems to stressors, such as fire, insects, pathogens, and climate variability (FW-DC-VEGTER-01 to 09). This would help support the species' persistence (if it still exists on the Ashley National Forest). This is because resistant and resilient landscapes would be less susceptible to catastrophic events that could destroy populations and habitat.

Ecosystem-level plan components would support habitat sustainability by ground cover, ecological integrity, and diversity of forested and non-forested areas that may serve as habitat for the Eureka mountainsnail (FW-DC-VEGTER-01 through 09, FW-GD-VEGTER-01 through 04, FW-DC-VEGNF-01, and FW-OB-VEGNF-01). Further, maintaining or improving soil quality and productivity, as well as coarse, woody debris and plant litter, would sustain habitat by providing necessary features such as food and cover (FW-DC-SOIL-01 and 02).

The sites known to be inhabited by Eureka mountainsnails are fenced and monitored, so it is unlikely that these populations would be directly threatened by human-caused activities such as livestock grazing and mining activities. Further, plan components include a guideline specific to the species that requires vegetation treatments avoid, minimize, or mitigate negative impacts on known Eureka mountainsnail sites (FW-GD-WILDL-06). However, human-caused activities could potentially degrade suitable habitat outside the known sites.

Plan components would alleviate potential habitat degradation and help maintain suitable habitat through measures to limit or avoid disturbance from forest management activities. Examples are ensuring livestock grazing and associated management activities are compatible with ecological functions and processes and sustain forage resources (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02), avoiding environmental impacts from energy and mineral exploration and development activities (FW-DC-MINL-02 and FW-GD-MINL-03), and retaining coarse, woody debris at the completion of management activities for soil ecological function and wildlife (FW-GD-SOIL-03). Ultimately, plan components would help protect sites that were once, and may still be, occupied. They also would provide ecological conditions outside the known sites that may serve as potential habitat for unknown or future populations.

Table D-11. Key Threats, Plan Components, and Expected Effects on Eureka Mountainsnail

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss from ecological stressors (wildlife and climate change)	Wildlife (FW-DC-WILDL-01, 02, and 03; FW-GO-WILDL-02; FW-GD-WILDL-06) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GD-VEGTER-01 through 04) Non-Forest Vegetation (FW-DC-VEGNF-01 and FW-OB-VEGNF-01) Soils (FW-DC-SOIL-01 and 02; FW-GD-SOIL-03) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01) Monitoring Table—Wildlife, Mon-WILDL-02	Ecosystem-level plan components for wildlife, terrestrial vegetation, non-forest vegetation, and carbon storage and sequestration would emphasize maintenance of key ecological conditions that are important for many species of conservation concern, including the Eureka mountainsnail. Components to achieve desired conditions for and restore the ecological function of terrestrial vegetation would sustain habitat by providing habitat features such as vegetation cover and coarse, woody debris. They would also help increase habitat resistance and resilience to ecological disturbances such as wildfire and climate change.
Habitat loss and degradation from human-caused activities (mining or improper grazing)	Livestock Grazing (FW-DC-GRAZ-02; FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-DC-MINL-02, FW-ST-MINL-02, and FW-GD-MINL-03) Soils (FW-GD-SOIL-03) Wildlife (FW-GD-WILDL-06)	Forest plan components for energy and minerals would minimize habitat loss or degradation by avoiding or minimizing adverse environmental impacts. Components for grazing would further reduce habitat degradation from human-caused activities by stipulating that activities be compatible with ecological functions and processes. A guideline for soil would retain coarse, woody debris at the completion of management activities. Also, a guideline specific to the species would require vegetation treatments to avoid or minimize negative impacts on known Eureka mountainsnail sites.

Plants

Riparian plants

(handsome pussytoes, compound kobresia, silvery primrose, and Ute ladies'-tresses)

Determination: The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of riparian plants (handsome pussytoes, compound kobresia, silvery primrose, and Ute ladies'-tresses) in the plan area. No additional species-specific plan components are warranted.

General Key Ecological Conditions: Each riparian species is associated with at least one of the following key ecological conditions (see at-risk species tables in appendix C for individual species' habitat descriptions): rare calcareous or rich fens, intermediate to rich fens, wet meadows, floodplains, streams, and other riparian habitat (Forest Service 2017a).

Key Threats to Persistence: Key threats to persistence are habitat loss or alteration from land use, such as agriculture, development, OHV use, grazing, and climate change that leads to drier and warmer conditions. For Ute ladies'-tresses, habitat loss or alteration from competition from nonnative plants (graminoids and tamarisk) and vegetation succession appears to be the most widespread threat (Forest Service 2017a).

Summary: In general, habitat for riparian plant species is characterized by intermittent and perennial streams with surface flows and groundwater connections adequate to support riparian vegetation. Wetlands on the Ashley National Forest form in areas fed by surface water or groundwater, such as lakes, ponds, fens, and wet meadows. Fens are defined as groundwater-fed, peat-accumulating wetlands with organic soils that typically support sedges and low-stature shrubs. These types of habitats are geographically restricted and rare in the plan area. Riparian areas cover approximately 33,200 acres, or 2.4 percent, of the Ashley National Forest; wetland areas next to lakes, ponds, and other waterbodies cover approximately 22,700 acres, or 1.6 percent; and fen wetlands cover proximately 13,869 acres, or 1 percent, of the Ashley National Forest (Forest Service GIS 2020).

More specifically, Ute ladies'-tresses, which is federally listed as threatened under the Endangered Species Act, exists in floodplains of the Green River that contain satisfactory plant composition and hydrological conditions. Plants positively respond to occasional disturbances that reduce the vegetation competition (Forest Service 2017a). Periodic water discharges from the Flaming Gorge Dam that simulate high spring water flows provide a disturbance mechanism that clears or reduces floodplains of woody debris, which improves habitat conditions for the plant. Habitat sustainability within the plan area is achievable if the Forest Service implements or maintains weed control measures, or both, that reduce or eradicate invasive plant species along river floodplains. Fen-associated species (silvery primrose, compound kobresia, and handsome pussytoes) inhabit intermediate to rich fens with satisfactory plant composition, ground cover, and hydrological conditions (Forest Service 2017a). Long-term monitoring indicates sustainability of fen habitat with current stressors (Forest Service 2017a).

Habitat loss or alteration from land use, such as agriculture, development, OHV use, and grazing, are the main human-caused stressors for riparian plant species. Some grazing and OHV use impacts have been observed in or near fens on the Ashley National Forest. Hydrological alterations following the construction of the Flaming Gorge Dam have affected habitat for Ute ladies'-tresses (Forest Service 2017a).

Plan components would help alleviate these threats and maintain or improve habitat. Avoiding or mitigating management activities that would compromise the overall ecological integrity and resilience of calcareous fens and peatlands (FW-ST-RAREHAB-01) would prevent future degradation of fen habitat. Maintaining or restoring habitat conditions and the natural timing and variability of water table elevation at springs, meadows, fens, and wetlands (groundwater-dependent ecosystems) (FW-OB-WATER-03, FW-GD-WATER-02, and FW-DC-WATER-09 and 10) would improve the ability of these areas to support fen-associated at-risk species (silvery primrose, compound kobresia, and handsome pussytoes).

Desired conditions for watersheds and riparian ecosystems would maintain or improve overall watershed conditions and habitat for riparian plant species such as Ute ladies'-tresses by ensuring riparian areas are resilient to disturbance, conditions allow for the propagation of flood-dependent plants, and conditions support healthy, vigorous, and self-perpetuating plant communities (FW-DC-WATER-01, 03, 04, and 06–08). Managing riparian management zones to maintain, protect, or enhance aquatic and riparian resource values (FW-GD-RMZ-01) would help protect riparian plant species from future habitat degradation and improve previously impaired conditions. Additional components for livestock grazing (FW-DC-GRAZ-01 and FW-GD-GRAZ-02), and energy and minerals (FW-GD-MINL-04) would ensure these activities are compatible with ecological functions and processes and avoid ground-disturbing activities in riparian management zones.

Ecological stressors for riparian plants include competition from nonnative plants, vegetation succession, and climate change. Invasive, nonnative woody and herbaceous plants have been introduced to the Ashley National Forest or have spread through natural pathways, while native encroaching species (typically coniferous trees and shrubs) have increased in cover and abundance along the mesic fringes of wetland meadows (Forest Service 2017a). Both nonnative, invasive plants and native encroaching species have the potential to displace riparian plants. If the climate becomes consistently warmer and drier, riparian and fen habitat integrity may be compromised.

Plan components would help alleviate these threats through restoration that reduces conifer encroachment, increases heterogeneity in riparian areas, and moves riparian vegetation composition and structure toward the natural range of variation (FW-DC-WATER-01, 03, 04, and 06–10; FW-OB-WATER-03; FW-GD-WATER-02; FW-DC-RMZ-01 and 02; FW-GD-RMZ-01 and 02; FW-DC-VEGNF-01; and FW-OB-VEGNF-01). These would improve growing conditions for riparian hardwoods and shrubs that are often shaded out by upland trees and shrubs (Forest Service 2017a). Prescribed fire and wildfire managed to meet resource objectives would improve the condition, vigor, and health of most native riparian plants.

Implementing weed control measures that reduce or eradicate invasive plant species along river floodplains would alleviate competition from invasive plants (Forest Service 2017a), such as tamarisk, and improve habitat sustainability in the plan area (FW-GO-VEGTER-01 and 02). Habitat enhancements and incorporating best available science in forest management would improve the resilience of riparian habitat to disturbances such as drought and climate change (FW-GO-CLIM-01; FW-DC-WATER-01, 03, and 07). This would help maintain the Ashley National Forest's ability to support at-risk riparian species under potential drier and warmer future conditions.

Overall, plan components would support the persistence of and maintain habitat for at-risk riparian plant species by ensuring that ecological processes are present and functioning in a manner that sustains long-term persistence, supports recovery, and maintains viable populations of at-risk plant species (FW-DC-ATRISK-01).

Table D-12. Key Threats, Plan Components, and Expected Effects on Riparian Plants

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss or alteration from human-caused stressors such as agriculture, development, and grazing	At-Risk Plant Species (FW-DC-ATRISK-01 and FW-GO-ATRISK-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-01, 03, 04, and 06 through 10; FW-OB-WATER-03; and FW-GD-WATER-02) Riparian Management Zones (FW-DC-RMZ-01 and 02; FW-GD-RMZ-01 and 02) Rare and Unique Habitats (FW-DC-RAREHAB-01 and 02; FW-ST-RAREHAB-01) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GO-VEGTER-01 through 03) Non-Forest Vegetation (FW-DC-ALPINE-01) Soils (FW-DC-SOIL-01, 02, 04, and 05; FW-GD-SOIL-05) Livestock Grazing (FW-DC-GRAZ-01; FW-GD-GRAZ-02) Energy and Minerals (FW-GD-MINL-04) Climate Change (FW-GO-CLIM-01) Monitoring Table— Terrestrial Vegetation; Aquatics; and Soils	Ecosystem-level direction for water, watersheds, aquatic, and riparian areas emphasizes conservation, maintenance, and restoration of aquatic and riparian ecosystem integrity. Along with the other components listed in the previous column, plan components would reduce the threat of riparian habitat degradation from future human-caused disturbances and restore previously damaged habitat.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Habitat loss or alteration from ecological stressors such as nonnative plants, vegetation succession, drought, wildfire, and climate change	At-Risk Plant Species (FW-DC-ATRISK-01 and FW-GO-ATRISK-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-01, 03, 04, and 06 through 10; FW-OB-WATER-03; FW-GD-WATER-02) Riparian Management Zones (FW-DC-RMZ-01 and 02; FW-GD-RMZ-01 and 02) Rare and Unique Habitats (FW-DC-RAREHAB-01 and 02; FW-ST-RAREHAB-01) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GO-VEGTER-01 through 03) Non-Forest Vegetation (FW-DC-ALPINE-01) Soils (FW-DC-SOIL-01, 02, 04, and 05; FW-GD-SOIL-05) Climate Change (FW-GO-CLIM-01) Monitoring Table— Terrestrial Vegetation; Aquatics; and Soils	Ecosystem-level components would minimize the occurrence and spread of nonnative plants, reduce vegetation succession to the extent possible, and increase habitat resilience to stochastic events, including high-severity wildfire, drought, and climate change. In areas where riparian enhancement projects are implemented, previously degraded habitat would be restored.

Upland plants

(Graham's columbine, Ownbey's thistle, Evert's wafer parsnip, clustered lady's slipper, Wasatch draba, rockcress draba, tundra draba, Untermann's daisy, Huber's pepperplant, Goodrich's blazingstar, Maybell locoweed, alpine poppy, stemless beardtongue, and desert phacelia)

Determination: For Graham's columbine, Ownbey's thistle, clustered lady's slipper, Wasatch draba, rockcress draba, tundra draba, Untermann's daisy, Huber's pepperplant, Goodrich's blazingstar, Maybell locoweed, alpine poppy, stemless beardtongue, and desert phacelia: The ecosystem plan components should provide the ecological conditions necessary to maintain viable populations of upland plants (Graham's columbine, Ownbey's thistle, clustered lady's slipper, Wasatch draba, rockcress draba, tundra draba, Untermann's daisy, Huber's pepperplant, Goodrich's blazingstar, Maybell locoweed, alpine poppy, stemless beardtongue, and desert phacelia) in the plan area. No additional species-specific plan components are warranted.

For Evert's wafer parsnip: The ecosystem plan components should provide the ecological conditions necessary to maintain a viable population of Evert's wafer parsnip in the plan area. Nonetheless, additional species-specific plan components have been provided for added clarity or measures of protection, or both.

General Key Ecological Conditions: Each upland species is associated with at least one of the following key ecological conditions (see at-risk species tables in appendix C for individual species' habitat descriptions): canyons, cliffs, ledges, seeps, alpine tundra, talus, scree slopes, escarpments, eroding slopes, semi-barrens, pinyon-juniper, sagebrush, desert shrub communities, or coniferous forests (Forest Service 2017a).

Key Threats to Persistence: Stressors include some or all of the following: habitat loss or alteration from land use such as agriculture, development, grazing, climate change, herbicide and pesticide use, nonnative plant invasions, conifer encroachment, OHV use, mineral exploration, timber harvest, bark beetle infestations, and wildfire (Forest Service 2017a).

Summary: Most at-risk upland plant species are associated with non-forest vegetation types on the Ashley National Forest, including alpine tundra, sagebrush, pinyon and juniper woodlands, and desert scrub. Clustered lady's slipper is the only species associated with forested vegetation (coniferous forests) in the plan area. A few species, such as Wasatch draba and Graham's columbine, are restricted to rare or specialized habitat, which limits their distribution in the plan area (Forest Service 2017a).

Human-caused stressors, such as agriculture, development, grazing, herbicide and pesticide use, OHV use, mineral exploration, and timber harvest, can lead to loss or alteration of upland habitat (Forest Service 2017a). Plan components would help alleviate these stressors by setting desired conditions to maintain essential ecosystem components, processes, and functions (FW-DC-VEGTER-01 through 09, FW-DC-CONIF-01 and 02, FW-DC-VEGNF-01, FW-DC-ALPINE-01, FW-DC-SHRUB-01, and FW-DC-SAGE-01 and 02). Vegetation treatments, chosen based on best available science, would help move vegetation toward desired conditions for specific vegetation types. Prescribed fire and naturally ignited fire treatments would be used to move vegetation types toward more natural fire patterns (FW-DC-FIRE-02 and 03; FW-GD-FIRE-03). The reduced frequency and/or severity of wildfire would maintain habitat for upland plant species by reducing habitat loss to burning (Forest Service 2017a).

Additional components for livestock grazing (FW-DC-GRAZ-02 and FW-GD-GRAZ-01), soils (FW-GD-SOIL-03 and 05), and rare and unique habitats (FW-ST-REHAB-01) would help maintain habitat

sustainability by ensuring sustainability and resiliency of forage resources; protecting soils from compaction, displacement, and erosion; and avoiding or mitigating management activities that would disrupt ecological processes or compromise the overall ecological integrity of rare ecosystems. Objectives to restore ecological function, integrity, and resilience of non-forest vegetation (FW-OB-VEGNF-01) would improve habitat conditions in areas that have been previously impaired by restoring these areas.

Climate change, nonnative plant invasions, conifer encroachment, bark beetle infestations, and wildfire are ecological stressors for upland at-risk plants. Invasive, nonnative woody and herbaceous plants have been introduced to the Ashley National Forest or have spread through natural pathways, while native encroaching species (typically coniferous trees and shrubs) have increased in cover and abundance in uplands (sagebrush/mountainbrush and grass/forb meadows) (Forest Service 2017a). Both nonnative, invasive plants and native encroaching species have the potential to displace upland plants. Predicted warmer and drier conditions from climate change may increase vegetation stress as well as wildfire intensity and frequency. Added effects from these stresses would help establish and spread invasive species (Halofsky et al. 2018a, 2018b).

Plan components would help alleviate ecological stressors through restoration that reduces conifer encroachment, increases heterogeneity of terrestrial vegetation, and moves terrestrial vegetation composition and structure toward the natural range of variation (FW-GO-VEGTER-01 through 04, FW-GD-VEGTER-01 through 04, FW-DC-VEGNF-01, and FW-OB-VEGNF-01). The plan components include a standard to maintain persistence of Evert's wafer parsnip on semi-barren habitat, by stipulating that total tree and shrub canopy cover shall not exceed 10 percent within the plant's habitat (FW-ST-ATRISK-01). This would alleviate the threat of conifer encroachment for Evert's wafer parsnip and other at-risk plant species found in unvegetated habitat types by improving growing conditions for species associated with non-forest vegetation that are often shaded out by upland trees and shrubs. Completing forested vegetation management treatments, such as timber harvest, planned ignitions, thinning, and planting (FW-OB-CONIF-01), would improve habitat conditions for clustered lady's slipper, which inhabits moderately dense to dense lodgepole pine forests with sparse understory species (Goodrich 2013).

Prescribed fire and wildfire managed to meet resource objectives would improve the condition, vigor, and health of most native upland plants. Implementing weed control measures that reduce or eradicate invasive plant species would alleviate competition from invasive plants, such as cheatgrass, and improve habitat sustainability in the plan area (FW-GO-VEGTER-01 and 02). This would ultimately improve or maintain pollinator habitat and plant species richness, composition, and diversity. Desired conditions for terrestrial vegetation would maintain essential ecosystem components, processes, and functions (FW-DC-VEGTER-01 through 09; FW-DC-CONIF-01 and 02; FW-DC-VEGNF-01; FW-DC-ALPINE-01; FW-DC-SHRUB-01; and FW-DC-SAGE-01 and 02). This would result in ecosystems that are resilient or adaptive to stressors, such as fire, insects, pathogens, and climate variability.

Overall, plan components would support the persistence of and maintain habitat for at-risk upland plant species by ensuring that ecological processes are present and functioning in a manner that sustains long-term persistence, supports recovery, and maintains viable populations of at-risk plant species (FW-DC-ATRISK-01).

Table D-13. Key Threats, Plan Components, and Expected Effects on Upland Plants

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats	Effects Summary
Habitat loss or alteration from human-caused stressors such as agriculture, development, grazing, herbicide and pesticide use, OHV use, mineral exploration, and timber harvest	At-Risk Plant Species (FW-DC-ATRISK-01; FW-GO-ATRISK-01; and FW-ST-ATRISK-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-07 and FW-OB-WATER-01) Rare and Unique Habitats (FW-ST-RAREHAB-01) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GO-VEGTER-01 through 04; and FW-GD-VEGTER-01 through 04) Coniferous Forests (FW-DC-CONIF-01 and 02) Non-Forest Vegetation (FW-DC-VEGNF-01; FW-DC-ALPINE-01; FW-DC-SHRUB-01; FW-DC-SAGE-01 and 02; and FW-OB-VEGNF-01) Soils (FW-DC-SOIL-01 through 05; FW-GD-SOIL-03 and 05) Fire (FW-DC-FIRE-02 and 03; FW-GD-FIRE-03) Livestock Grazing (FW-DC-GRAZ-02 and FW-GD-GRAZ-01) Monitoring Table—Terrestrial Vegetation and Soils	Ecosystem-level plan components for at-risk plant species, terrestrial vegetation, and other resources would emphasize maintenance of essential ecosystem components, processes, and functions for terrestrial ecosystems. These plan components would support ecosystems and conditions that provide essential habitat characteristics for native species, vegetation diversity, and ecological integrity and resilience. In areas where habitat enhancement projects are implemented, previously degraded habitat would be restored.

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats	Effects Summary
Habitat loss or alteration from ecological stressors such as climate change, nonnative plant invasions, conifer encroachment, bark beetle infestations, and wildfire	At-Risk Plant Species (FW-DC-ATRISK-01; FW-GO-ATRISK-01; FW-ST-ATRISK-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-07 and FW-OB-WATER-01) Rare and Unique Habitats (FW-ST-RAREHAB-01) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09; FW-GO-VEGTER-01 through 04; and FW-GD-VEGTER-01 through 04) Coniferous Forests (FW-DC-CONIF-01 and 02) Non-Forest Vegetation (FW-DC-VEGNF-01; FW-DC-ALPINE-01; FW-DC-SHRUB-01; FW-DC-SAGE-01 and 02; and FW-OB-VEGNF-01) Soils (FW-DC-SOIL-01 through 05; FW-GD-SOIL-03 and 05) Carbon Storage and Sequestration (FW-DC-CARBON-01) Adapting to Climate Change (FW-GO-CLIM-01) Monitoring Table—Terrestrial Vegetation and Soils	Ecosystem-level components designed to move toward desired conditions would aid in forest habitats being more resilient to ecological stressors, including high-severity wildfire, drought, beetle infestations, and climate change.

Fish

Colorado River cutthroat trout

Determination: The ecosystem plan components may not provide the ecological conditions necessary to maintain a viable population of the Colorado River cutthroat trout in the plan area. Therefore, additional species-specific plan components have been provided. The combination of ecosystem and species-specific plan components should provide the ecological conditions necessary to maintain a viable population of the Colorado River cutthroat trout in the plan area.

General Key Ecological Conditions: Key ecological conditions for Colorado River cutthroat trout include sufficient water quality and quantity, characterized by cool, clear water and well-vegetated streambanks for cover and bank stability. The species requires spawning gravels free of fine sediment to complete its life cycle. Connectivity of habitat is required with no nonnative trout present (Forest Service 2017a).

Key Threats to Persistence: Without past, current, and ongoing conservation efforts, this species' persistence on the Ashley National Forest is at risk. This is primarily due to the presence of nonnative trout, whose presence often results in hybridization with Colorado River cutthroat trout and causes competition for resources. Other threats primarily include any sediment-causing activities, such as overgrazing, severe fire, logging, and off-highway vehicle (OHV) use, as well as climate change (Forest Service 2017a).

Summary: Colorado River cutthroat trout populations exist across the Ashley National Forest, and there are 350 miles of Colorado River cutthroat trout streams on the Ashley National Forest; these are classified as part of the "Current Population" (Forest Service GIS 2020). Its habitat is found in various LTAs, including Stream Canyon, Glacial Bottom, Strawberry Highlands, Avintaquin Canyon, Greendale Plateau, and Round Park (Forest Service 2017a). State fish and game agencies manage native and nonnative sport fish. While the Forest Service works closely with the State agencies in population management, its primary role is the management of aquatic habitat on which these species depend. Specific plan components for fish and aquatic ecosystems are identified and would work in concert with direction for watershed, aquatics, and riparian ecosystems to provide or improve habitat that supports Colorado River cutthroat trout populations.

The Colorado River cutthroat trout requires cool, clear water, deep pools and boulders, and well-vegetated streambanks for cover and bank stability (Forest Service 2017a). Although suitable habitat is abundant on the Ashley National Forest, and most is in good condition, there are areas where erosion caused by overgrazing and unauthorized OHV use have degraded habitat by adding sediment to streams (Forest Service 2017a). Additionally, the potential for climate change to cause warming temperatures and the resulting effects on seasonal stream flows could reduce habitat suitability in the long term (Forest Service 2017a).

As listed in table D-11, plan components for fisheries/aquatics and watershed, aquatics, and riparian ecosystems would reduce these threats by setting desired conditions for maintaining or improving habitat connectivity, water quality, and hydrological features, such as pools, runs, and riffles, and reducing sediment-disturbing activities and fine silts in fish spawning habitat. Restoration projects would help improve aquatic and riparian habitat conditions and increase habitat availability. Improving riparian vegetation would help to maintain suitable water temperatures (Forest Service 2017a). Measures such as avoiding construction of stream crossings and other channel work using heavy equipment in streams with populations of Colorado River cutthroat trout during their spawning and incubation seasons would reduce

the potential for sedimentation from management activities to interfere with spawning. Monitoring for changes in Colorado River cutthroat trout habitat and population trends would help identify areas were habitat improvements or protections are necessary.

Additionally, forest plan management approaches for fisheries would include specific elements that would help maintain the persistence of Colorado River cutthroat trout on the Ashley National Forest. These are:

1. Identify and protect all existing Colorado River cutthroat trout-occupied habitat.
2. Collaborate with State wildlife agencies to expand the range of Colorado River cutthroat trout on the plan area.
3. Where appropriate, maintain or improve stream connectivity.
4. Consider upland watershed effects from various forest management activities to ensure protection for aquatic habitat and species.
5. Include design elements as part of the proposed action for all projects in the vicinity of aquatic habitat to avoid impacts on the habitat.
6. Include project design features to restore habitat and populations of aquatic and riparian species. Incorporate mitigation measures to reduce stream impacts and protect fish populations.

One of the primary threats to Colorado River cutthroat trout populations is the existence of nonnative trout (Forest Service 2017a). Plan components for fisheries/aquatics would help alleviate this threat by including measures to prevent the introduction of aquatic invasive species (for example, cleaning equipment that is exposed to untreated water, providing information on preventive measures related to aquatic invasive species at water-based recreation sites, and treating perennial waterbodies to remove aquatic invasive species). One plan component specifies that “Habitat conditions would contribute to the long-term viability of Colorado River cutthroat trout throughout its historical range. Cutthroat trout populations are stable or increasing, protected from nonnative fish” (FW-DC-FISH-05). Other components are an objective to treat perennial waterbodies to remove aquatic invasive species (FW-OB-FISH-05) and a guideline to allow for barriers to preclude invasion of nonnative species such as brook trout (FW-GD-FISH-01).

Table D-14. Key Threats, Plan Components, and Expected Effects on Colorado River Cutthroat Trout

Key Threats to Persistence	Plan Components that Alleviate or Eliminate Key Threats (See the Forest Plan)	Effects Summary
Hybridization, competition, and predation from nonnative trout	Fisheries/Aquatic (FW-DC-FISH-04, 05, and 06; FW-OBJ-FISH-05; and FW-GD-FISH-01, 03, and 04) Riparian Management Zones (FW-DC-RMZ-01) Monitoring Table—Aquatics; Watersheds; and Fisheries, Colorado River Cutthroat Trout Management Approaches—Fisheries 01 through 06	Ecosystem-level components would minimize the occurrence and spread of nonnative fishes to the extent possible; thus, they would reduce threats to the Colorado River cutthroat trout.
Habitat loss or degradation from sediment-causing activities, such as overgrazing, severe fire, logging, and OHV use	Watershed, Aquatic, and Riparian Ecosystems (FW-DC-WATER-01 through 08; FW-OBJ-WATER-01 and 02; and FW-GD-WATER-02) Fisheries/Aquatic (FW-DC-FISH-01 through 07; FW-OBJ-FISH-01 through 04; and FW-GD-FISH-02) Riparian Management Zones (FW-DC-RMZ-01 and 02; FW-GD-RMZ-01 through 04) Monitoring Table—Aquatics; Watersheds; and Fisheries, Colorado River Cutthroat Trout **Management Approaches—Fisheries 01 through 06**	Ecosystem-level direction for water, watersheds, aquatic, and riparian areas emphasizes conservation, maintenance, and restoration of aquatic and riparian ecosystem integrity, which would help protect habitat from sediment-causing activities and restore previously damaged habitat. This would reduce the threat of fish habitat degradation and might even improve previously impaired conditions.
Habitat loss or degradation due to climate change	Watershed, Aquatic, and Riparian Ecosystems (FW-DC-WATER-01 and 03) Fisheries/Aquatic (FW-DC-FISH-03) Adapting to Climate Change (FW-GO-CLIM-01) Monitoring Table—Aquatics; Watersheds; and Fisheries, Colorado River Cutthroat Trout	Ecosystem-level components designed to move toward desired conditions would aid in forest habitats being more resilient to stochastic events, including high-severity wildfire, drought, and climate change.

Plan Component Crosswalks for At-Risk Species, Pollinators, Habitat Types, and Aquatics (Water)

The Forest Service adopted an ecosystem and species-specific approach, known as a coarse-filter/fine-filter approach, to provide for the diversity of plant and animal communities and the long-term persistence of native species in the plan area. This approach is designed to maintain or restore ecological conditions for ecosystem integrity and ecosystem diversity in the plan area within the agency's authority and the inherent capability of the land. The tables below crosswalk plan components with at-risk species and habitat types.

At-Risk Species, Habitat Types, and Associated Plan Components

Management direction and monitoring items that are particularly relevant to how key ecosystem characteristics and stressors for species of conservation concern are addressed by coarse-filter and species-specific plan components are included in the following tables. Some plan components deal with stressors or threats relevant to populations in the plan area, and some deal with the ecological conditions or key ecosystem characteristics required by the species or species group on the Ashley National Forest.

The plan components in table D-16 through table D-18 may apply at the forestwide scale (FW) or the designated area (DA) or management area (MA) scale.

Table D-15. Plan component, monitoring, and management approach crosswalk for pollinators

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Pollinators Habitat Variety of wildflowers, native grasses and legumes, shrubs, and trees Stressors/Threats Habitat loss, climate change, invasive species, overgrazing	Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-ALPINE-01, FW-DC-SAGE-01 and 02, FW-DC-SHRUB-01, FW-DC-REHAB-01) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-PJ-01; FW-DC-CONIF-01 and 02) Watershed, Aquatic, Riparian Ecosystems (FW-DC-WATER-01, 06, 07, 09, and 10) Riparian Management Zones (FW-DC-RMZ-01 and 02) Soils (FW-DC-SOIL-01 through 04) Fire (FW-DC-FIRE-02 and 03) Livestock Grazing (FW-DC-GRAZ-02) Carbon Storage and Sequestration (FW-DC-CARBON-01)	Wildlife (FW-GO-WILDL-02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation FW-OB-CONIF-01 Non-Forest Vegetation FW-OB-VEGNF-01 and 02 Fire (FW-GO-FIRE-02) Adapting to Climate Change FW-GO-CLIM-01	Wildlife FW-GD-WILDL-12 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Non-Forest Vegetation FW-ST-REHAB-01 Forest Vegetation (FW-GD-ASPEN-01 through 04; FW-GD-PJ-01) Watershed, Aquatic, Riparian Ecosystems FW-GD-WATER-02 Riparian Management Zones FW-GD-RMZ-01, 04, and 05 Soils (FW-DC-SOIL-01, 04, and 05) Fire (FW-GD-FIRE-03) Livestock Grazing FW-GD-GRAZ-01 and 02	Monitoring Table- Terrestrial Vegetation, Non-Forest Vegetation Aspen, Watersheds, Livestock grazing, Fire, Soils Management Approach – Watershed, Aquatic, Riparian Ecosystems-07 through 09 -Forest Vegetation 08 -Pinyon/Juniper Woodlands 01 and 02

Table D-16. Plan Component, Monitoring, and Management Approach Crosswalk for At-Risk Wildlife Species

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Canada lynx (Federal – threatened species) Habitat Forested areas, including Engelmann spruce, subalpine fir, lodgepole pine, Douglas fir, and aspen. Areas of dense understory cover and/or thickets of young trees and mature forests with large amounts of coarse woody debris. Stressors/Threats Habitat fragmentation or degradation, spruce/pine beetle outbreaks, climate change	Wildlife (Introduction Section) Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02) Timber (FW-DC-TIMB-01 and 03) Fire (FW-DC-FIRE-03) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Soils (FW-DC-SOIL-01, 02, 04, 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Riparian Management Zones (FW-DC-RMZ-01) Fire (FW-DC-FIRE-03) Energy and Minerals (FW-DC-MINL-02) Recreation Opportunity Spectrum (FW-DC-ROS-05 and 06)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation FW-OB-CONIF-01 Fire (FW-GO-FIRE-02) Energy and Minerals (FW-GO-MINL-02 and 03) Adapting to Climate Change (FW-GO-CLIM-01)	Wildlife FW-GD-WILDL-13 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Forest Vegetation FW-GD-ASPEN-01 through 04 Timber (FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Soils FW-GD-SOIL-01 through 05 Riparian Management Zones FW-GD-RMZ-03 through 05 Fire (FW-GD-FIRE-01, 03 and 04) Protection of Highly Valued Resources or Assets (FW-GD-HVRA-03) Energy and Minerals (FW-GD-MINL-01, 03 and 05) Recreation Opportunity Spectrum (FW-GD-ROS-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological	Monitoring Table- Wildlife, Watershed, Soils, Terrestrial Vegetation, Forest Vegetation, Aspen, Fire **Management Approach** – Wildlife 02 -Forest Vegetation 01–03, 05, 08 -Timber 01-03 -High Uintas Wilderness 01 -Flaming Gorge National Recreation Area 03 and 04 -Ashley Karst National Recreation and Geologic Area 01

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Canada lynx *(cont.)*	Dispersed Recreation (FW-DC-RECDIS-01 and 02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06 and 09) High Uintas Wilderness (DA-DC-HUW-01 through 07) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	Area (DA-ST-AKNRGA-01 and 02)	*(continued)*

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Wolverine (Federal – proposed species) Habitat Tundra, boreal forests, and coniferous forests of western mountains, and habitats that support its prey base and carrion. Ecological needs of the species are large territories in relatively inaccessible landscapes at high elevation (5,906 to 11,483 feet), with rugged and talus features, and access to a variety of food resources, that varies with seasons. Stressors/Threats Wildland fire, climate change, and prey species habitat degradation.	Wildlife (Introduction Section) Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02) Timber (FW-DC-TIMB-01 and 03) Fire (FW-DC-FIRE-03) Soils (FW-DC-SOIL-01, 02, 04, 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Riparian Management Zones (FW-DC-RMZ-01) Fire (FW-DC-FIRE-03) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Energy and Minerals (FW-DC-MINL-02)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation FW-OB-CONIF-01 Fire (FW-GO-FIRE-02) Energy and Minerals (FW-GO-MINL-02 and 03) Adapting to Climate Change (FW-GO-CLIM-01)	Wildlife FW-GD-WILDL-13 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Forest Vegetation FW-GD-ASPEN-01 through 04 Timber (FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Soils FW-GD-SOIL-01 through 05 Riparian Management Zones FW-GD-RMZ-03 through 05 Fire (FW-GD-FIRE-01, 03 and 04) Protection of Highly Valued Resources or Assets (FW-GD-HVRA-03) Energy and Minerals (FW-GD-MINL-01, 03 and 05) Recreation Opportunity Spectrum (FW-GD-ROS-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table- Wildlife, Watershed, Soils, Terrestrial Vegetation, Forest Vegetation, Aspen, Fire **Management Approach** – Wildlife 02 -Forest Vegetation 01–03, 05, 08 -Timber 01–03 -High Uintas Wilderness 01 -Flaming Gorge National Recreation Area 03 and 04 -Ashley Karst National Recreation and Geologic Area 01

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Wolverine *(cont.)*	Recreation Opportunity Spectrum (FW-DC-ROS-05 and 06) Dispersed Recreation (FW-DC-RECDIS-01 and 02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06 and 09) High Uintas Wilderness (DA-DC-HUW-01 through 07) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	*(continued)*	*(continued)*

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Mexican spotted owl (Federal – threatened species) Habitat Steep-walled rocky canyon lands with presence of water; clumps or stringers of mixed conifer, pine/oak, pinyon/juniper, and/or riparian vegetation. Stressors/Threats Wildland fire and climate change. A lesser threat is commercial timber harvest.	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02) Timber (FW-DC-TIMB-01 and 03) Non-Forest Vegetation (FW-DC-VEGNF-01) Fire (FW-DC-FIRE-03) Soils (FW-DC-SOIL-01, 02, 04, 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Riparian Management Zones (FW-DC-RMZ-01 and 02) Fire (FW-DC-FIRE-03) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02) Recreation Opportunity Spectrum (FW-DC-ROS-05 and 06) Dispersed Recreation (FW-DC-RECDIS-01 and 02)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation FW-OB-CONIF-01 Non-Forest Vegetation (FW-OB-VEGNF-01) Fire (FW-GO-FIRE-02) Energy and Minerals (FW-GO-MINL-02 and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife FW-GD-WILDL-02, 03, 13, and 14 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Forest Vegetation FW-GD-ASPEN-01 through 04 Timber (FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03 Soils FW-GD-SOIL-01 through 05 Riparian Management Zones FW-GD-RMZ-03 through 05 Fire (FW-GD-FIRE-01, 03 and 04) Livestock Grazing (FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-ST-MINL-01 and 02; FW-GD-MINL-03, 04 and 05) Recreation Opportunity Spectrum (FW-GD-ROS-01) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table- Wildlife, Watershed and Riparian, Soils, Terrestrial Vegetation, Forest Vegetation, Non-Forest Vegetation, Aspen, Fire, Livestock Grazing, Soils, **Management Approach** – -Forest Vegetation 01-03, 05, 08 -Timber 01-03 -Livestock Grazing 01 -Watershed, Aquatic, and Riparian Ecosystems 07, 08, and 09 -Flaming Gorge National Recreation Area 03 and 04 -Ashley Karst National Recreation and Geologic Area 01

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Mexican spotted owl *(cont.)*	Carbon Storage and Sequestration (FW-DC-CARBON-01) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06 and 09) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Back Country Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	*(continued)*	*(continued)*

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Bighorn sheep (Species of Conservation Concern) Habitat Open habitat types (high alpine to lower grasslands) with adjacent steep rocky areas for escape and safety. Habitat is characterized by rugged terrain including canyons, gulches, talus cliffs, steep slopes, and mountaintops. Stressors/Threats Habitat loss, conifer encroachment, climate change, invasion of noxious weeds, respiratory pathogen transmission from domestic sheep.	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01 and FW-DC-ALPINE-01) Soils (FW-DC-SOIL-01 through 05) Fire (FW-DC-FIRE-02) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02, 11, and 12) Recreation Opportunity Spectrum (FW-DC-ROS-05 and 06) Carbon Storage and Sequestration (FW-DC-CARBON-01) Flaming Gorge National Recreation Area (DA-DC-FGNRA-04) High Uintas Wilderness (DA-DC-HUW-01 through 07)	Wildlife (FW-GO-WILDL-01, 02 and 03) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Non-Forest Vegetation (FW-OB-VEGNF-01) Fire (FW-GO-FIRE-02 and FW-OB-FIRE-01 and 02) Adapting to Climate Change (FW-GO-CLIM-01) Energy and Minerals (FW-GO-MINL-02 and 03)	Wildlife FW-GD-WILDL-01, 09, 10, and 15 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Soils (FW-GD-01, 04, 05) Livestock Grazing FW-GD-GRAZ-01 and 02 Energy and Minerals FW-ST-MINL-02, FW-GD-MINL-01, 03 and 05 Fire (FW-GD-FIRE-01, 03, and 04) Recreation Opportunity Spectrum (FW-GD-ROS-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; DA-SUIT-HUW-01 and 02)	Monitoring Table- Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Soils, Fire, Livestock Grazing Management Approach – Wildlife 02, 03, and 05 -High Uintas Wilderness 01 -Flaming Gorge National Recreation Area 01, 02, and 03

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Bighorn sheep *(cont.)*	Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	*(continued)*	*(continued)*
Black rosy-finch (Species of Conservation Concern) Habitat Barren, rocky, or grassy areas in alpine among glaciers and receding snowbanks, or beyond timberline. Stressors/Threats Habitat loss, climate change	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01 and FW-DC-ALPINE-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-01, 02, 03, and 06 through 10) Riparian Management Zones (FW-DC-RMZ-01 and 02) Soils (FW-DC-SOIL-01 through 05) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02, 11, and 12) Recreation Opportunity Spectrum (FW-DC-ROS-05 and 06) Carbon Storage and Sequestration (FW-DC-CARBON-01)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Non-Forest Vegetation (FW-OB-VEGNF-01) Watershed and Aquatic Ecosystems (FW-OB-WATER-01 and 03) Adapting to Climate Change (FW-GO-CLIM-01)	Wildlife FW-GD-WILDL-14 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Watershed and Aquatic Ecosystems (FW-GD-WATER-02) Riparian Management Zones (FW-GD-RMZ-01 and 05) Livestock Grazing FW-GD-GRAZ-01 and 02 Soils (FW-GD-01, 04, and 05) Energy and Minerals FW-GD-MINL-01, 03 through 05 Recreation Opportunity Spectrum (FW-GD-ROS-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table- Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Soils Management Approach -High Uintas Wilderness 01

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Black rosy-finch *(cont.)*	High Uintas Wilderness (DA-DC-HUW-01 through 07) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	*(continued)*	*(continued)*

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Eureka mountainsnail (Species of Conservation Concern) Habitat Vegetated limestone slopes (tree or shrub cover) with woody debris Stressors/Threats Habitat loss, fire, climate change	Wildlife (FW-DC-WILDL-01, 02, 03) Non-Forest Vegetation (FW-DC-VEGNF-01) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02) Soils (FW-DC-SOIL-01 through 05) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation FW-OB-CONIF-01 Non-Forest Vegetation (FW-OB-VEGNF-01) Adapting to Climate Change (FW-GO-CLIM-01)	Wildlife FW-GD-WILDL-06 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Forest Vegetation FW-GD-ASPEN-01 through 04 Soils FW-GD-SOIL-01 through 05 Livestock Grazing FW-GD-GRAZ-01 and 02 Energy and Minerals FW-ST-MINL-02, FW-GD-MINL-03 through 05 Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table- Wildlife, Terrestrial Vegetation, Forest Vegetation, Non-Forest Vegetation, Soils

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Fringed myotis (Species of Conservation Concern) Habitat Middle elevations in desert, riparian, grassland, and woodland habitats in conjunction with the presence of caves Stressors/Threats Disturbance to hibernacula and maternity sites, habitat (riparian) loss, climate change, spruce/pine beetle outbreaks, and white-nosed syndrome	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation FW-DC-PJ-01 Non-Forest Vegetation (FW-DC-VEGNF-01, FW-DC-SAGE-01 and 02, FW-DC-SHRUB-01) Watershed, Aquatic, and Riparian Ecosystems (FW-DC-WATER-01, 03, 04, and 06 through 10) Riparian Management Zones (FW-DC-RMZ-01 and 02) Soils (FW-DC-SOIL-01 through 05) Livestock Grazing (FW-DC-GRAZ-02) Fire (FW-DC-FIRE-02) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Energy and Minerals (FW-DC-MINL-02) Geologic Resources and Hazards (FW-CD-GEOL-03 and 05)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation FW-OB-CONIF-01 and FW-OB-PJ-01 Non-Forest Vegetation (FW-OB-VEGNF-01) Watershed and Aquatic Ecosystems (FW-OB-WATER-01 and 03) Fire (FW-GO-FIRE-02 and FW-OB-FIRE-01 and 02) Energy and Minerals (FW-GO-02 and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife FW-GD-WILDL-04 and 05 Forest Vegetation FW-GD-PJ-01 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Watershed and Aquatic Ecosystems (FW-GD-WATER-02) Riparian Management Zones FW-GD-RMZ-01, 02, and 05 Soils FW-GD-SOIL-01 through 05 Livestock Grazing FW-GD-GRAZ-01 and 02 Energy and Minerals FW-ST-MINL-02 and FW-GD-MINL-01, 03, 04, and 05 Fire (FW-GD-FIRE-01, 03, and 04) Geologic Resources and Hazards FW-GD-GEOL-03 and 04 Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table- Wildlife, Terrestrial Vegetation, Forest Vegetation Non-Forest Vegetation, Aquatics, Soils, Watersheds, Livestock Grazing, Fire Management Approach – Wildlife 01 and 03 -Forest Vegetation 01, 08 -Pinyon/Juniper Woodlands 01 and 02 -Flaming Gorge National Recreation Area 03

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Fringed myotis *(cont.)*	Carbon Storage and Sequestration (FW-DC-CARBON-01) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06 and 09) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02)	*(continued)*	*(continued)*	*(continued)*

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Greater sage-grouse (Species of Conservation Concern) Habitat Sagebrush communities with structural diversity for nesting and brood rearing Stressors/Threats Predation, wildfire, habitat fragmentation from oil and gas development and other human-caused disturbances, conifer encroachment, noxious weeds, and climate change.	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01, FW-DC-SAGE-01 and 02, FW-DC-SHRUB-01) Riparian Management Zones (FW-DC-01) Soils (FW-DC-SOIL-01 through 04) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02 and 11) Watershed and Aquatic Ecosystems (FW-DC-WATER-01, 06, and 07) Fire (FW-DC-FIRE-02 and 03) Carbon Storage and Sequestration (FW-DC-CARBON-01) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06 and 09) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Non-Forest Vegetation (FW-OB-VEGNF-01 and FW-OB-SAGE-01) Fire (FW-GO-FIRE-02 and FW-OB-FIRE-01 and 02) Energy and Minerals (FW-GO-02 and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife (FW-GD-WILDL-01, 07, 11, and 14) Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Soils (FW-DC-SOIL-01, 04, 05) Livestock Grazing FW-GD-GRAZ-01 and 02 Energy and Minerals FW-ST-MINL-01 and 02, FW-GD-MINL-01 through 05 Riparian Management Zones FW-GD-RMZ-01, 02, 04 and 05 Fire (FW-GD-FIRE-03) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table- Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Watersheds, Soils, Livestock Grazing, Fire Management Approach – Wildlife 02, 03, and 04 -Flaming Gorge National Recreation Area 03

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Peregrine falcon (Species of Conservation Concern) Habitat Riparian habitat associated with nesting habitat (cliffs) Stressors/Threats Riparian degradation, climate change, and disturbance to nesting birds	Wildlife (FW-DC-WILDL-01, 02, 03) Riparian Management Zones (FW-DC-01 and 02) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation (FW-DC-ASPEN-01 and 02; FW-DC-CONIF-01 and 02) Non-Forest Vegetation (FW-DC-VEGNF-01, FW-DC-ALPINE-01, FW-DC-SAGE-01 and 02, FW-DC-SHRUB-01) Livestock Grazing (FW-DC-GRAZ-02) Soils (FW-DC-SOIL-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Fire (FW-DC-FIRE-02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Recreation Opportunity Spectrum (FW-DC-ROS-05 and 06) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06 and 09)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation FW-OB-CONIF-01 Non-Forest Vegetation (FW-OB-VEGNF-01) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife FW-GD-WILDL-02, 03, 08, and 14 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Forest Vegetation (FW-GD-ASPEN-01 through 04) Riparian Management Zones (FW-GD-01, 04, and 05) Livestock Grazing FW-GD-GRAZ-01 and 02 Soils FW-GD-SOIL-03, 04, and 05 Energy and Minerals FW-ST-MINL-01 and 02; FW-GD-MINL-01, 03, 04, and 05 Fire (FW-GD-FIRE-01, 03, and 04) Recreation Opportunity Spectrum (FW-GD-ROS-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01: DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table- Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Watersheds, Soils, Livestock Grazing, Fire, Management Approach -High Uintas Wilderness 01 -Flaming Gorge National Recreation Area 03

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Peregrine falcon *(cont.)*	High Uintas Wilderness (DA-DC-HUW-01 through 07) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	*(continued)*	*(continued)*

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Pygmy rabbit (Species of Conservation Concern) Habitat Dense stands of big sagebrush growing in deep loose soils Stressors/Threats Habitat degradation from, conifer encroachment, noxious weeds, and climate change	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01, FW-DC-SAGE-01 and 02, FW-DC-SHRUB-01) Soils (FW-DC-SOIL-01 through 04) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02 and 11) Fire (FW-DC-FIRE-02 and 03) Carbon Storage and Sequestration (FW-DC-CARBON-01) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06 and 09)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Non-Forest Vegetation (FW-OB-VEGNF-01) Fire (FW-GO-FIRE-02 and FW-OB-FIRE-01 and 02) Energy and Minerals (FW-GO-02 and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife FW-GD-WILDL-01, 07, and 11 Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Soils (FW-DC-SOIL-01, 04, and 05) Livestock Grazing FW-GD-GRAZ-01 and 02 Energy and Minerals FW-ST-MINL-01 and 02, FW-GD-MINL-01, 03, and 05 Fire (FW-GD-FIRE-03)	Monitoring Table- Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Livestock Grazing, Fire, Soils Management Approach -Flaming Gorge National Recreation Area 03

Table D-17. Plan component, monitoring, and management approach crosswalk for at-risk plants

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Ute Ladies' Tresses (Federal – threatened species) Habitat Floodplains, streams, and other riparian habitat Stressors/Threats Stream channelization for agriculture and irrigation development, habitat loss or alteration from competition of nonnative plants, vegetation succession, or overgrazing	At-Risk Plant Species (FW-DC-ATRISK-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-01, 03, 04, 06, 07, 09, and 10) Riparian Management Zones (FW-DC-RMZ-01 and 02) Terrestrial Vegetation (FW-DC-VEGTER-01 through 08) Soils (FW-DC-SOIL-01, 04 and 05) Livestock Grazing (FW-DC-GRAZ-01)	At-Risk Plant Species (FW-GO-ATRISK-01) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Adapting to Climate Change (FW-GO-CLIM-01)	Watershed and Aquatic Ecosystems (FW-GD-WATER-02) Soils (FW-GD-SOIL-05) Livestock Grazing (FW-GD-GRAZ-02) Energy and Minerals (FW-GD-MINL-04)	Monitoring Table—Terrestrial Vegetation, At-Risk Plant Species, Invasive and Noxious Plan Species Monitoring Table—Watersheds, Aquatic and Riparian Ecosystems

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Species of Conservation Concern Riparian Plants Handsome pussytoes Compound Kobresia Silvery Primrose (Plan components listed are applicable to at least one SCC riparian plant species) Stressors/Threats Stream channelization for agriculture and irrigation structure development, habitat loss or alteration, nonnative plants and vegetation succession, overgrazing	At-Risk Plant Species (FW-DC-ATRISK-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-01, 03, 04, and 06 9 and 10) Rare and Unique Habitats (FW-DC-RAREHAB-01) Riparian Management Zones (FW-DC-RMZ-01 and 02) Terrestrial Vegetation (FW-DC-VEGTER-01 through 03, 05, 08, and 09) Soils (FW-DC-SOIL-01, 02, 04, and 05) Livestock Grazing (FW-DC-GRAZ-01)	At-Risk Plant Species (FW-GO-ATRISK-01) Watershed and Aquatic Ecosystems (FW-OB-WATER-03) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02 Adapting to Climate Change (FW-GO-CLIM-01)	Watershed and Aquatic Ecosystems (FW-GD-WATER-02) Riparian Management Zones (FW-GD-RMZ-01 and 02) Rare and Unique Habitats (FW-ST-RAREHAB-01) Soils (FW-GD-SOIL-05) Livestock Grazing (FW-GD-GRAZ-01 and 022) Energy and Minerals (FW-GD-MINL-04)	Monitoring Table—Terrestrial Vegetation, At-Risk Plant Species Monitoring Table—Watersheds, Aquatics, and Riparian Ecosystems Monitoring Table—Soils Monitoring Table—Terrestrial Vegetation, Invasive and Noxious Plant Species Monitoring Table—Terrestrial Vegetation, Non-Forest Vegetation

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Species of Conservation Concern Upland Plants Graham's Columbine Ownbey's Thistle Evert's Wafer Parsnip Clustered Lady's Slipper Wasatch Draba Rockcress Draba Tundra Draba Untermann's Daisy Huber's Pepperplant Goodrich's Blazingstar Maybell Locoweed Alpine Poppy Stemless Beardtongue Desert Phacelia (Plan components listed are applicable to at least one SCC upland plant species) <u>Stressors/Threats</u> Habitat loss or alteration, nonnative plants and vegetation succession, overgrazing	At-Risk Plant Species (FW-DC-ATRISK-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-07) Coniferous Forests (FW-DC-CONIF-01 and 02) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-ALPINE-01, FW-DC-VEGNF-01, FW-DC-ALPINE-01, FW-DC-SHRUB-01, FW-DC-SAGE-01 and 02) Fire (FW-DC-FIRE-02 and 03) Soils (FW-DC-SOIL-01 through 05) Carbon Storage and Sequestration (FW-DC-CARBON-01 and 02) Livestock Grazing (FW-DC-GRAZ-02)	At-Risk Plant Species (FW-GO-ATRISK-01) Watershed and Aquatic Ecosystems (FW-OB-WATER-01) Terrestrial Vegetation (FW-GO-VEGTER-01 through 04) Non-Forest Vegetation (FW-DC-VEGNF-01) Adapting to Climate Change (FW-GO-CLIM-01)	At-Risk Plant Species (FW-ST-ATRISK-01) Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Soils (FW-GD-SOIL-03 and 05) Fire (FW-GD-FIRE-03) Timber (FW-ST-TIMB-04) Livestock Grazing (FW-GD-GRAZ-01 and 02)	Monitoring Table—Terrestrial Vegetation, At-Risk Plant Species Monitoring Table—Terrestrial Ecosystems, Forested Vegetation Monitoring Table—Terrestrial Vegetation, Invasive and Noxious Plant Species Monitoring Table—Terrestrial Vegetation, Non-Forest Vegetation Monitoring Table—Soils

Table D-18. Plan component, monitoring, and management approach crosswalk for at-risk fish

Species	Desired Conditions	Goals or Objectives	Standards and Guidelines	Monitoring and Management Approaches
Species of Conservation Concern Fisheries Colorado River cutthroat trout <u>Habitat</u> Cold, clear water with diverse habitat characteristics such as pools, riffles, runs, large woody debris, and abundant spawning gravels <u>Stressors/Threats</u> Hybridization and competition from nonnative fishes, any sediment causing activities (such as unauthorized OHV use)	Watershed, Aquatic, Fisheries, and Riparian (FW-DC-WATER-01 through 08; FW-DC-FISH-01 through 07; FW-DC-RMZ-01 and 02)	Watershed, Aquatic, Fisheries, and Riparian (FW-OB-WATER-01 and 02; FW-OB-FISH-01 and 02)	Watershed, Aquatic, Fisheries, and Riparian (FW-GD-WATER-02; FW-GD-FISH-01 through 04; FW-GD-RMZ-01 through 04)	Monitoring Table—Aquatics Management Approaches 01 through 06

Habitat Types and Associated Wildlife Groups with Related Plan Components

Habitat types and associated plan components are included in table D-19. Some plan components deal with stressors or threats relevant to a habitat type on the Ashley National Forest. The plan components may apply at the FW or the DA or MA scale. This is not an exhaustive list of management direction for all habitat types.

Table D-19. Habitat types and associated plan components, and monitoring and management approaches

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Alpine Stressors/Threats Habitat loss due to climate change, grazing, mining Associated Wildlife Groups Ptarmigans, finches and other migratory birds, raptors, pikas, elk, moose, deer, mountain goats, bighorn sheep, bear, coyotes, and small mammals such as pocket gophers. Acres 168,700 Percentage of All Habitat Types on the Plan Area 12	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01; FW-DC-ALPINE-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-01, 03, 06 through 10) Riparian Management Zones (FW-DC-RMZ-01 and 02) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02, 06, 11, and 12) Soils (FW-DC-SOIL-01 through 05)	Wildlife (FW-GO-WILDL-01 and 02) Non-Forest Vegetation (FW-OB-VEGNF-01) Watershed and Aquatic Ecosystems (FW-OB-WATER-01 and 03) Adapting to Climate Change (FW-GO-CLIM-01) Fire (FW-GO-FIRE-01 and 02)	Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Watershed and Aquatic Ecosystems (FW-GD-WATER-02) Riparian Management Zones (FW-GD-RMZ-01 and 05) Livestock Grazing (FW-GD-GRAZ-01 and 02) Soils (FW-GD-SOIL-01, 04, and 05) Energy and Minerals (FW-GD-MINL-01, 03 through 05) Transportation Infrastructure – Roads and Trails (FW-GD-ROAD-02; FW-GD-TRAIL-02) Fire (FW-GD-FIRE-01 through 03) Air Quality (FW-GD-AIR-01)	Monitoring Table— Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Soils, Livestock Grazing, Air, Watersheds, Aquatics, Wilderness, Fire, Management Approach High Uintas Wilderness 01

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Alpine *(cont.)*	Transportation Infrastructure – Roads and Trails (FW-DC-ROAD-02 and FW-DC-TRAIL-02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Air Quality (FW-DC-AIR-01 through 04) Fire (FW-DC-FIRE-02 and 03) Recreation Opportunity Spectrum (FW-DC-ROS-05 through 07) High Uintas Wilderness (DA-DC-HUW-01 through 07) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	Lands Special Uses (FW-GD-LANDSU-01) Recreation Opportunity Spectrum (FW-GD-ROS-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	*(continued)*

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Coniferous Forest Stressors/Threats Habitat fragmentation or degradation, spruce/pine beetle outbreaks, climate change Associated Wildlife Groups Large mammals (such as elk, deer, moose), small mammals (such as mice, tree squirrels, chipmunks, rabbit, hare), pine marten, predators (bear, cougar, coyote), large-tree or forest-dependent species, cavity-nesting birds, raptors, and migratory birds Acres 621,600 Percentage of All Habitat Types in the Plan Area 45	Wildlife (FW-DC-WILDL-01, 02, and 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation (FW-DC-CONIF-01 and 02) Timber (FW-DC-TIMB-01 and 03) Soils (FW-DC-SOIL-01, 02, 04, and 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Riparian Management Zones (FW-DC-RMZ-01) Fire (FW-DC-FIRE-02 and 03) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Energy and Minerals (FW-DC-MINL-02, 06, 11, and 12) Transportation Infrastructure – Roads and Trails (FW-DC-ROAD-02; FW-DC-TRAIL-02)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation (FW-OB-CONIF-01) Fire (FW-GO-FIRE-01, 02, and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife (FW-GD-WILDL-01, 02, 03, 13 through 15) Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Forest Vegetation (FW-GD-CONIF-01) Timber (FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Soils (FW-GD-SOIL-01 through 05) Riparian Management Zones (FW-GD-RMZ-03 through 05) Fire (FW-GD-FIRE-01, 03, and 04) Protection of Highly Valued Resources or Assets (FW-GD-HVRA-03) Energy and Minerals (FW-GD-MINL-01, 03, and 05) Recreation Opportunity Spectrum (FW-GD-ROS-01) Air Quality (FW-GD-AIR-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; DA-SUIT-HUW-01 and 02))	Monitoring Table— Wildlife, Terrestrial Vegetation, Forest Vegetation Soils, Air, Watersheds, Wilderness, Fire, Management Approach - High Uintas Wilderness 01 Timber 01–03 Forest Vegetation 01–03, 05, and 08 Flaming Gorge National Recreation Area 03 and 04

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Coniferous Forest *(cont.)*	Recreation Opportunity Spectrum (FW-DC-ROS-05 through 07) Carbon Storage and Sequestration (FW-DC-CARBON-01) Air Quality (FW-DC-AIR-01 through 04) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06, and 09) High Uintas Wilderness (DA-DC-HUW-01 through 07) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02) Eligible and Suitable Wild and Scenic Rivers (DA-ST-WSR-01)	*(continued)*

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Deciduous Forest Stressors/Threats Habitat fragmentation or degradation, climate change, conifer encroachment, noxious weeds, disease Associated Wildlife Groups Cavity nesting birds, migratory birds, raptors, game birds (such as grouse), big game (such as deer, elk, moose), predators (bear, cougar, coyote), beavers, and small mammals, such as mice, voles, and rabbits Acres 151,600 Percentage of All Habitat Types on the Plan Area 11	Wildlife (FW-DC-WILDL-01, 02, and 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation (FW-DC-ASPEN-01 and 02) Timber (FW-DC-TIMB-01 and 03) Soils (FW-DC-SOIL-01, 02, 04, and 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-06 and 07) Riparian Management Zones (FW-DC-RMZ-01) Livestock Grazing (FW-DC-GRAZ-02) Fire (FW-DC-FIRE-02 and 03) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Energy and Minerals (FW-DC-MINL-02, 06, 11, and 12) Transportation Infrastructure – Roads and Trails (FW-DC-ROAD-02; FW-DC-TRAIL-02)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Fire (FW-GO-FIRE-01, 02, and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife (FW-GD-WILDL-01, 03, 13 through 15) Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Forest Vegetation (FW-GD-ASPEN-01 through 04) Timber (FW-ST-TIMB-01 through 10; FW-GD-TIMB-01 through 03) Soils (FW-GD-SOIL-01 through 05) Riparian Management Zones (FW-GD-RMZ-03 through 05) Fire (FW-GD-FIRE-01 03, and 04) Protection of Highly Valued Resources or Assets (MA-GD-HVRA-03) Livestock Grazing (FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-GD-MINL-01, 03, and 05) Recreation Opportunity Spectrum (FW-GD-ROS-01) Air Quality (FW-GD-AIR-01)	Monitoring Table— Wildlife, Focal Species (Aspen), Terrestrial Vegetation, Forest Vegetation, Soils, Air, Watersheds, Livestock Grazing, Wilderness, Fire, Management Approach - High Uintas Wilderness 01 Timber 01–03 Forest Vegetation 01–03, 05, and 08 Flaming Gorge National Recreation Area 03 and 04

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Deciduous Forest *(cont.)*	Recreation Opportunity Spectrum (FW-DC-ROS-05 through 07) Carbon Storage and Sequestration (FW-DC-CARBON-01) Air Quality (FW-DC-AIR-01 through 04) Flaming Gorge National Recreation Area (DA-DC-FGNRA-06, and 09) High Uintas Wilderness (DA-DC-HUW-01 through 07) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01; DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02) Wild and Scenic Rivers (DA-ST-WSR-01)	*(continued)*

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Grasslands (*Low-Elevation Grasslands and Mid to High-Elevation Mountain Meadows*) Stressors/Threats Habitat loss, conifer encroachment, climate change, invasion of noxious weeds Associated Wildlife Groups Large mammals (such as deer, elk, antelope) predators (cougar, coyote, bobcat), small mammals (such as mice, ground squirrels, voles, gophers, rabbits), raptors, and migratory birds Acres 14,700 Percentage of All Habitat Types on the Plan Area Less than 2	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01; FW-DC-ALPINE-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-01, 03, and 06 through 10) Riparian Management Zones (FW-DC-RMZ-01 and 02) Livestock Grazing (FW-DC-GRAZ-02) Soils (FW-DC-SOIL-01 through 05) Energy and Minerals (FW-DC-MINL-02, 06, 11, and 12) Transportation Infrastructure – Roads and Trails (FW-DC-ROAD-02; FW-DC-TRAIL-02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Air Quality (FW-DC-AIR-01 through 04)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 through 03) Non-Forest Vegetation (FW-OB-VEGNF-01) Fire (FW-GO-FIRE-01, 02, and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife (FW-GD-WILDL-01, 14, and 15) Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Watershed and Aquatic Ecosystems (FW-GD-WATER-02) Riparian Management Zones (FW-GD-RMZ-01 and 05) Livestock Grazing (FW-GD-GRAZ-01 and 02) Soils (FW-GD-SOIL-01, 04, and 05) Energy and Minerals (FW-ST-MINL-01 and 02; FW-GD-MINL-01 through 05) Transportation Infrastructure – Roads and Trails (FW-GD-ROAD-02; FW-GD-TRAIL-02) Fire (FW-GD-FIRE-01, 03 and 04) Protection of Highly Valued Resources or Assets (MA-GD-HVRA-03) Air Quality (FW-GD-AIR-01) Lands Special Uses (FW-GD-LANDSU-01)	Monitoring Table— Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Soils, Livestock Grazing, Air, Watersheds, Aquatics, Wilderness, Fire Management Approach Wildlife 02-05 High Uintas Wilderness 01 Flaming Gorge National Recreation Area 02

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Grasslands *(cont.)*	Fire (FW-DC-FIRE-02 and 03) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Recreation Opportunity Spectrum (FW-DC-ROS-05 through 07) High Uintas Wilderness (DA-DC-HUW-01 through 07) Flaming Gorge National Recreation Area (DA-DC-FGNRA-02 and 04) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	Recreation Opportunity Spectrum (FW-GD-ROS-01) High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01: DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	*(continued)*

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Shrubland (*Sagebrush, Desert Shrub, Mountain Brush*) Stressors/Threats Conifer encroachment, habitat fragmentation, noxious weeds, and climate change Associated Wildlife Groups Large mammals (such as deer, elk, antelope), predators (cougar, bobcat, coyote), small mammals (such as mice, ground squirrels, voles, rabbits), upland game birds (such as grouse), raptors, and migratory birds Acres 222,000 Percentage of All Habitat Types on the Planning Unit 16	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01; FW-DC-SAGE-01 and 02; FW-DC-SHRUB-01) Watershed and Aquatic Ecosystems (FW-DC-WATER-07) Livestock Grazing (FW-DC-GRAZ-02) Soils (FW-DC-SOIL-01 through 05) Fire (FW-DC-FIRE-02 and 03) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03) Energy and Minerals (FW-DC-MINL-02, 06, 11, and 12) Transportation Infrastructure – Roads and Trails (FW-DC-ROAD-02; FW-DC-TRAIL-02)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01, 02, 03) Non-Forest Vegetation (FW-OB-VEGNF-01) Energy and Minerals (FW-GO-02 and 03) Fire (FW-GO-FIRE-01, 02, and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife (FW-GD-WILDL-01, 07, 11, 14, and 15) Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Livestock Grazing (FW-GD-GRAZ-01 and 02) Soils (FW-GD-SOIL-01, 04, and 05) Fire (FW-GD-FIRE-01,03, and 04) Energy and Minerals (FW-ST-MINL-01 and 02; FW-GD-MINL-01, 03, and 05) Air Quality (FW-GD-AIR-01) Recreation Opportunity Spectrum (FW-GD-ROS-01) Lands Special Uses (FW-GD-LANDSU-01) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table— Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Soils, Livestock Grazing, Air, Watersheds, Fire Management Approach - Wildlife 02-05 Flaming Gorge National Recreation Area 02

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Shrubland *(cont.)*	Carbon Storage and Sequestration (FW-DC-CARBON-01) Air Quality (FW-DC-AIR-01 through 04) Recreation Opportunity Spectrum (FW-DC-ROS-05 through 07) Flaming Gorge National Recreation Area (DA-DC-FGNRA-02 and 04) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02)	*(continued)*	*(continued)*	*(continued)*

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Riparian Stressors/Threats Habitat loss, conifer encroachment, noxious weeds, climate change Associated Wildlife Groups Migratory birds, small mammals (such as rabbit, rabbit, hare, mice, voles, squirrel, chipmunk, foraging bats), large mammals (such as deer, elk, moose, antelope), predators (bear, cougar, coyote, bobcat), raptors, game birds (such as grouse) Acres 33,3000 Percentage of All Habitat Types on the Plan Area 2	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01; FW-DC-ALPINE-01; FW-DC-RAREHAB-01) Watershed, Aquatic, and Riparian Ecosystems (FW-DC-WATER-01 through 10) Riparian Management Zones (FW-DC-RMZ-01 and 02) Soils (FW-DC-SOIL-01 through 05) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02, 06, 11, and 12) Transportation Infrastructure – Roads and Trails (FW-DC-ROAD-02; FW-DC-TRAIL-02) Fire (FW-DC-FIRE-02 and 03) Protection of Highly Valued Resources or Assets (FW-DC-HVRA-03)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Non-Forest Vegetation (FW-OB-VEGNF-01) Watershed and Aquatic Ecosystems (FW-OB-WATER-01, 02, and 03) Adapting to Climate Change (FW-GO-CLIM-01)	Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Non-Forest Vegetation (FW-ST-RAREHAB-01) Watershed and Aquatic Ecosystems (FW-GD-WATER-02) Riparian Management Zones (FW-GD-RMZ-01 through 05) Soils (FW-GD-SOIL-01, 04, and 05) Livestock Grazing (FW-GD-GRAZ-01 and 02) Energy and Minerals (FW-ST-MINL-01 and 02; FW-GD-MINL-01 through 05) Transportation Infrastructure – Roads and Trails (FW-ST-ROAD-02; FW-GD-ROAD-02; and FW-GD-TRAIL-02) Fire (FW-GD-FIRE-01, 03, and 04) Recreation Opportunity Spectrum (FW-GD-ROS-01) Air Quality (FW-GD-AIR-01) Lands Special Uses (FW-GD-LANDSU-01)	Monitoring Table—Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Soils, Livestock Grazing, Air, Watersheds, Aquatics, Wilderness, Fire Management Approach - High Uintas Wilderness 01 Flaming Gorge National Recreation Area 02 Watershed, Aquatic, Riparian Ecosystems 01 through 04

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Riparian *(cont.)*	Recreation Opportunity Spectrum (FW-DC-ROS-05 through 07) Carbon Storage and Sequestration (FW-DC-CARBON-01) Air Quality (FW-DC-AIR-01 through 04) High Uintas Wilderness (DA-DC-HUW-01 through 07) Flaming Gorge National Recreation Area (DA-DC-FGNRA-02 and 04) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	High Uintas Wilderness (DA-ST-HUW-01 through 04; DA-GD-HUW-01 and 02; DA-SUIT-HUW-01 and 02) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02) Eligible and Suitable Wild and Scenic Rivers (DA-ST-WSR-01)	*(continued)*

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Woodland (*Pinyon/Juniper*) Stressors/Threats Habitat fragmentation or degradation, invasive species/noxious weeds, climate change Associated Wildlife Groups Large mammals (such as deer and elk), predators (bear, cougar, coyote, and bobcat), small mammals (such as rabbits, ground squirrels, and mice), cavity nesting birds, and migratory birds Acres 120,300 Percentage of All Habitat Types on the Plan Area 9	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Forest Vegetation (FW-DC-PJ-01) Soils (FW-DC-SOIL-01 through 05) Watershed and Aquatic Ecosystems (FW-DC-WATER-07) Fire (FW-DC-FIRE-02 and 03) Protection of Highly Valued Resources or Assets (MA-DC-HVRA-03) Energy and Minerals (FW-DC-MINL-02, 06, 11, and 12) Transportation Infrastructure – Roads and Trails (FW-DC-ROAD-02; FW-DC-TRAIL-02) Carbon Storage and Sequestration (FW-DC-CARBON-01) Air Quality (FW-DC-AIR-01 through 04)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Forest Vegetation (FW-OB-PJ-01) Fire (FW-GO-FI-01, 02, and 03) Adapting to Climate Change (FW-GO-CLIM-01) Flaming Gorge National Recreation Area (DA-GO-FGNRA-02)	Wildlife (FW-GD-WILDL-01, 03, 14, and 15) Terrestrial Vegetation (FW-GD-VEGTER-01 through 04) Forest Vegetation (FW-GD-PJ-01) Soils (FW-GD-SOIL-01, 04, and 05) Fire (FW-GD-FIRE-01, 03, and 04) Protection of Highly Valued Resources or Assets (MA-GD-HVRA-03) Energy and Minerals (FW-ST-MINL-01; FW-GD-MINL-01, 03, and 05) Air Quality (FW-GD-AIR-01) Lands Special Uses (FW-GD-LANDSU-01) Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02)	Monitoring Table— Wildlife, Terrestrial Vegetation, Forest Vegetation, Soils, Air, Watersheds, Fire Management Approach - Wildlife 02, 03, 04 Pinyon/Juniper Woodlands 01 and 02 Flaming Gorge National Recreation Area 02, 03, 04

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Woodland (*Pinyon/Juniper*) *(cont.)*	Flaming Gorge National Recreation Area (DA-DC-FGNRA-06, and 09) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	*(continued)*	*(continued)*

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Water Stressors/Threats Riparian degradation, noxious weeds, aquatic invasives, climate change Associated Wildlife Groups Waterfowl, fish, amphibians, aquatic invertebrates, aquatic reptiles, and foraging raptors Acres 44,700 Percentage of All Habitat Types on the Plan Area 3	Wildlife (FW-DC-WILDL-01, 02, 03) Terrestrial Vegetation (FW-DC-VEGTER-01 through 09) Non-Forest Vegetation (FW-DC-VEGNF-01; FW-DC-ALPINE-01; FW-DC-RAREHAB-01) Watershed, Aquatic, and Riparian Ecosystems (FW-DC-WATER-01 through 10; FW-DC-FISH-01 through 07) Riparian Management Zones (FW-DC-RMZ-01 and 02) Soils (FW-DC-SOIL-01 through 05) Livestock Grazing (FW-DC-GRAZ-02) Energy and Minerals (FW-DC-MINL-02, 06, 11, and 12) Transportation Infrastructure – Roads and Trails (FW-DC-ROAD-02; FW-DC-TRAIL-02) Fire (FW-DC-FIRE-02 and 03)	Wildlife (FW-GO-WILDL-01 and 02) Terrestrial Vegetation (FW-GO-VEGTER-01 and 02) Non-Forest Vegetation (FW-OB-VEGNF-01) Watershed and Aquatic Ecosystems (FW-OB-WATER-01, 02, and 03; FW-OB-FISH-01 through 04) Visitor Education And Interpretation FW-GO-VISEDU-03 Flaming Gorge National Recreation Area DA-GO-FGNRA-01 Adapting to Climate Change (FW-GO-CLIM-01)	Terrestrial Vegetation FW-GD-VEGTER-01 through 04 Non-Forest Vegetation FW-ST-RAREHAB-01 Watershed and Aquatic Ecosystems (FW-GD-WATER-02; FW-GD-FISH-01 through 04) Riparian Management Zones FW-GD-RMZ-01 through 05 Soils FW-GD-SOIL-01 through 05 Livestock Grazing FW-GD-GRAZ-01 and 02 Energy and Minerals FW-ST-MINL-01 and 02, FW-GD-MINL-01 through 05 Transportation Infrastructure – Roads and Trails FW-ST-ROAD-02, FW-GD-ROAD-02 and 03; FW-GD-TRAIL-02 and 03 Fire FW-GD-FIRE-01 through 03 Recreation Opportunity Spectrum FW-GD-ROS-01 Air Quality FW-GD-AIR-01	Monitoring Table—Wildlife, Terrestrial Vegetation, Non-Forest Vegetation, Soils, Livestock Grazing, Air, Watersheds, Aquatics, Wilderness, Fire Management Approach - High Uintas Wilderness 01 Flaming Gorge National Recreation Area 02 Watershed, Aquatic, Riparian Ecosystems 01 through 09 Fisheries 01 through 06

Habitat Types and Associated Wildlife Groups	Desired Conditions	Goals or Objectives	Standards, Guidelines, and Suitability	Monitoring and Management Approaches
Water *(cont.)*	Recreation Opportunity Spectrum (FW-DC-ROS-05 through 07) Carbon Storage and Sequestration (FW-DC-CARBON-01) Air Quality (FW-DC-AIR-01 through 04) High Uintas Wilderness (DA-DC-HUW-01 through 07) Flaming Gorge National Recreation Area (DA-DC-FGNRA-03, and 04) Ashley Karst National Recreation and Geological Area (DA-DC-AKNRGA-01 and 02) Eligible and Suitable Wild and Scenic Rivers (DA-DC-WSR-01) Backcountry Recreation Area (MA-DC-RMABACK-02, 03, and 05)	*(continued)*	Lands Special Uses FW-GD-LANDSU-01 High Uintas Wilderness DA-ST-HUW-01 and 02; DA-GD-HUW-01 and 02; DA-SUIT-HUW-01 and 02 Ashley Karst National Recreation and Geological Area (DA-ST-AKNRGA-01 and 02) Eligible and Suitable Wild and Scenic Rivers DA-ST-WSR-01	*(continued)*

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Appendix E

Compatibility of Plan with Other Agency Plans

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Appendix E. Compatibility of Plan with Other Agency Plans

Introduction and Background

The 2012 planning rule (36 Code of Federal Regulations [CFR] § 219.4(b)) requires the review of the planning and land use policies of other Federal agencies, State and local governments, and Indian tribes. This review includes (1) consideration of the objectives of these entities as expressed in their plans and policies, (2) the compatibility and interrelated impacts of these plans and policies, (3) opportunities for the plan to address the impacts identified or contribute to joint objectives, and (4) opportunities to resolve or reduce conflicts, within the context of developing the plan's desired conditions or objectives. Language providing for the coordination of forest planning with other area planning efforts is included in National Forest System land management planning regulations (36 CFR 219.4(b)) and in the 2012 Forest Service Handbook (1909.12 chapter 44 Public Participation). The responsible official is not seeking to direct or control management of lands outside of the plan area, nor will the responsible official conform management to meet non-Forest Service objectives or policies.

Direction on reviewing relevant planning and land use policies of other public agencies in included in the Forest Service Handbook: "The Responsible Official shall ensure that the Interdisciplinary Team reviews the relevant planning and land use policies of other public agencies to understand and give consideration to those agencies' objectives. The Responsible Official is not required to ensure that a Forest Service land management plan is in accord with State, local or Tribal resource, and land management plans. In the course of considering those agencies' objectives, however, the Responsible Official shall consider ways the Forest Service land management plan could contribute to common objectives, address impacts, resolve or reduce conflicts and contribute to compatibility between Forest Service and other agencies' plans" (1909.12 chapter 44 Public Participation).

Some Tribal or local governments or other public agencies do not have formal land management plans or may have plans that are not current. Where current plan policies are not available, the responsible official may consider other sources of information to ensure a clear understanding of the objectives of other agencies.

Guidance from the Council on Environmental Quality states that "environmental impact statements shall discuss any inconsistency of a proposed action with any approved State, Tribal, or local plan or law (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law." (40 CFR 1506.2(d)). The environmental consequences section should include discussion of "possible conflicts between the proposed action and the objectives of Federal, regional, State, Tribal, and local land use plans, policies and controls for the area concerned" (40 CFR 1502.16(a)(5)). The Council on Environmental Quality further states, however, that the National Environmental Policy Act does not require reconciliation of inconsistencies (40 CFR 1506.2(d)).

Agency Engagement

Engagement with cooperating agencies has occurred throughout the planning process, beginning with the assessment phase in 2016. The planning team hosted 15 formal meetings with cooperating agencies to review comments on the preliminary need for change, wilderness report, wild and scenic rivers report and the proposed land management plan. The forest planning team has also met with cooperating agencies,

upon request, to review comments on a preliminary draft of the proposed plan and environmental impact statement.

An administrative copy of the draft Environmental Impact Statement (EIS) was released to cooperators in February 2021 for review prior to the general release. Comments received from cooperators were reviewed and discussed and updates were incorporated in documents. The draft EIS was formally released for a 90-day comment period in November 2021. Following the release of the draft EIS, the Forest Service provided additional opportunities for engagement with cooperators. Forest Service staff facilitated meetings, calls, and a series of meetings over two days in June 2022 to discuss specific issues that the cooperating agencies had submitted as comments, as well as how the Ashley proposed to address the concerns. Planning team members were available to answer questions and to offer additional explanation to the cooperating agencies. Stemming from these meetings, two working groups were formed, a subset of cooperators and forest staff, to address plan direction wording on livestock grazing and bighorn sheep. The resulting revised plan component language was subsequently reviewed by the forest supervisor.

Plan Consistency Review

A plan consistency review was undertaken in 2018 (planning record exhibit) of the following agency resource plans: State of Utah Resource Management Plan[1]; Daggett County, Utah; Duchesne County, Utah; Sweetwater County, Wyoming; Sweetwater Conservation District; and Ute Indian Tribe. In spring 2018 staff from the Ashley National Forest requested that cooperating agencies provide current copies of their agency resource management plans. The Ute Indian Tribe provided copies of several resource-specific plans for review. The planning team reviewed the provided tribal, county, and state resource management plans for consistency with the proposed forest plan. Consistency review findings were tracked by resource topic and review findings were discussed at interdisciplinary team meetings. Where appropriate, edits were made to the forest plan.

This appendix incorporates review of these plans and their updates, as applicable as well as review following additional agency plans: State of Wyoming;[2] Summit County, Utah County, and Uintah County in Utah; and the Daggett Conservation District and Uintah Conservation District, both in Utah. See table E-1 for a full list of all of the resource plans reviewed.

Plan consistency review is based on plan direction in modified alternative B, the forest plan. It is recognized that new plans may be developed and additional revisions to existing state and local plans may occur over the implementation period of the plan. The Ashley National Forest will continue to strive for constructive partnerships with local government officials through cooperating agency agreements, regular briefings, the Resource Advisory Councils, and ongoing engagement between the Forest and other agency officials. These relationships result in better communication of information that is essential to making sound, responsible land management decisions. Information is included by plan to highlight plan inconsistences.

[1] State of Utah and county plans are accessible at https://rmp.utah.gov/
[2] Accessible at https://wgfd.wyo.gov/Habitat/Habitat-Plans

Table E-1. Other Agency Plans and Location

Plan	Location (URL)
Ute Indian Tribe's Sclerocactus Management Plan for the Uintah and Ouray Indian Reservation, Uintah Basin, Utah (2015), Part 1	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:d9aadef0-f1b2-47fa-bc83-918b861d10fe
Ute Indian Tribe's Sclerocactus Management Plan for the Uintah and Ouray Indian Reservation, Uintah Basin, Utah (2015), Part 2	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:03265155-04ee-4135-a44b-09501be7b701
Ute Indian Tribe's Conservation Strategy for the Western Yellow-Billed Cuckoo on the Uintah and Ouray Indian Reservation, Uintah Basin, Utah (2016)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:6e22c93e-e672-4888-9ec6-0eef9772ea14
Ute Indian Tribe's Greater Sage-Grouse Ordinance (2013)	Not available online.
Conservation Strategy for Colorado River Cutthroat Trout (*Oncorhynchus clarkia pleuriticus*) in the States of Colorado, Utah, and Wyoming (2006)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:f5bf42c9-f5b3-410a-a794-f38fa846ebfd
Conservation Agreement for Colorado River Cutthroat Trout (*Oncorhynchus clarkii pleuriticus*) in the States of Colorado, Utah, and Wyoming (2006)	https://westernnativetrout.org/wp-content/uploads/2019/07/crct_conservation_agreement_final_dec06.pdf
State of Utah Resource Management Plan (2018)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:33cde2c5-8366-48b3-8443-58b4188054a4
Utah Forest Action Plan Division of Forestry, Fire & State Lands (2020)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:abc57129-0534-45cf-adf9-91422fd00e98
Utah's Coordinated Action Plan for Water (2022)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:a45b7cf8-a0c2-44d8-98f2-dfd1596606c1
Utah Shared Stewardship Action Plan (2019)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:8ce5f7a2-64d5-4e72-b03c-6420d9acf97b
Duchesne County General Plan (Spring 1997 [Amended Winter 1998, Winter 2005, June 25, 2007, April 16, 2012, August 19, 2013, July 17, 2017, October 22, 2018 and November 18, 2019])	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:65804da6-50f6-4fcd-a671-ad5dd6c5a437
2017 Daggett County General Plan Chapter 8 – Resource Management Plan (2017)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:ab9fc388-d7a6-4f2c-ada2-aca2247af1db
Uintah County Resource Management Plan (2017)	Uintah_CRMP_2019_.pdf (Review) - Adobe cloud storage
Summit County Resource Management Plan (2017)	https://ut-summitcounty2.civicplus.com/DocumentCenter/View/5783/Summit-County_RMP_CC-Draft-3_170627-PDF
Utah County Resource Management Plan (2017) and Utah County General Plan (2020)	Utah County : General Plan (municipalcodeonline.com)
Wyoming Game & Fish Department Statewide Habitat Plan 2020 (2020)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:4d610b59-0e90-43c8-94b5-6537e41f50ab
Wyoming Forest Action Plan Wyoming Statewide Forest Resource Assessment and Forest Resource Strategy (2020)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:41bb0fdc-8ba2-4875-be44-5387f87ee5bc

Plan	Location (URL)
Sweetwater County Federal Lands and Resources Plan (2022)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:52307d5e-d360-4523-bed5-f8d60551c7c2
Daggett County Resource Assessment (2012)	Not available online.
Uintah County Resource Assessment (2012)	Not available online.
Long Range Plan Uinta County Conservation District 2017–2021 (2016)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:65ad3e22-c166-4e35-8022-900c125bcda0
Sweetwater County Conservation District Land and Resource Use Plan and Policy 2020–2025 Final Version Release (2020)	https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:0736c99a-96f2-4ae1-85d2-ca2d1cfd9958

Summary Information for Other Agencies' Plans

The following sections provides details by agency and resource to highlight key areas of compatibility or inconsistency between the plans as well as to discuss the resolution of conflicts if applicable. Discussions on potential inconsistencies along with additional information on the relevant forest plan direction and implementation are indented underneath agency plan components and labeled "review findings."

Ute Indian Tribe

Sclerocactus Management Plan Part 1.pdf
https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:d9aadef0-f1b2-47fa-bc83-918b861d10fe

Sclerocactus Management Plan Part 2.pdf
https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:03265155-04ee-4135-a44b-09501be7b701

Western Yellow-Billed Cuckoo Management Plan.pdf
https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:6e22c93e-e672-4888-9ec6-0eef9772ea14

Greater Sage-Grouse Conservation Ordinance: Not available online.

The following wildlife and vegetation resource management plans developed by the Ute Indian Tribe were reviewed: Tribal Management Plan on Hookless Cactus, and Conservation Strategy for the Yellow-Billed Cuckoo, however as discussed in Appendix H, Response to Comments, since typical habitat for the yellow-billed cuckoo and hookless cactus does not occur on the planning unit, consistency with tribal conservation plans for these species is not applicable.

Ute Indian Tribe's *Sclerocactus* Management Plan for the Uintah and Ouray Indian Reservation, Uintah Basin, Utah (2015)

Conservation Goals

Generally consistent with the forest plan; the Ute Indian Tribe's *Sclerocactus* plan contained goals relevant to the reconstruction of *Sclerocactus* habitat and the establishment and enforcement of specific protocols and project-related actions to reduce or minimize adverse impacts to *Sclerocactus* individuals and its habitat. While the forest plan does not explicitly name *Sclerocactus* habitat reconstruction or specific protocols and actions, FW-GO-ATRISK-01 includes goals regarding the persistence and recovery of federally protected plants. FW-GO-ATRISK-01 also includes the cooperation with other government

agencies, conservation groups, and landowners who help expand inventories, identify new habitat and promote other actions to enhance plant habitat conservation or restoration.

Sclerocactus Conservation Strategy

No applicable plan components in the forest plan.

Allowable Surface Disturbance within Suitable Sclerocactus Habitat

No applicable plan components in the forest plan.

Designate Sclerocactus Refuge Area

No applicable plan components in the forest plan.

Environmental Requirements and Measures

No applicable plan components in the forest plan.

Exceptions, Waivers, and Modification Criteria

No applicable plan components in the forest plan.

Sclerocactus Conservation Mitigation Fund

No applicable plan components in the forest plan.

Reclamation and Ecological Restoration Objectives

No applicable plan components in the forest plan.

Reclamation and Ecological Restoration Actions

No applicable plan components in the forest plan.

Ute Indian Tribe's Conservation Strategy for the Western Yellow-Billed Cuckoo on the Uintah and Ouray Indian Reservation, Uintah Basin, Utah (2016)

Conservation Goals

No applicable plan components in the forest plan.

Conservation Strategy

Typical yellow-billed cuckoo habitat does not occur on the Ashley National Forest, and thus the forest plan does not contain plan components specifically for the species.

Ute Indian Tribe's Greater Sage-Grouse Ordinance (2013)

Title III. Greater sage-Grouse Conservation.

Generally consistent with the forest plan.

Multi-Cooperator Agreements

Conservation Strategy for Colorado River Cutthroat Trout

Conservation Strategy for Colorado River Cutthroat Trout (*Oncorhynchus clarkia pleuriticus*) in the States of Colorado, Utah, and Wyoming (2006)[3]

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:f5bf42c9-f5b3-410a-a794-f38fa846ebfdConservation Agreement for Colorado River Cutthroat Trout (*Oncorhynchus clarkii pleuriticus*) in the States of Colorado Utah and Wyominghttps://westernnativetrout.org/wp-content/uploads/2019/07/crct_conservation_agreement_final_dec06.pdf

Conservation Strategy and Conservation Agreement Involved parties: Colorado Department of Natural Resources, Utah Department of Natural Resources, Wyoming Game and Fish Department, Ute Indian Tribe, United States Department of Interior (Bureau of Land Management (BLM) and National Park Service)

Goals

Generally consistent with the forest plan.

Objectives

Generally consistent with the forest plan; Colorado River cutthroat trout strategy plans contained objectives and strategies related to identifying and characterizing Colorado River cutthroat trout populations, which are outside of the Forest Service's purview.

State of Utah

State of Utah Resource Management Plan (2018)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:33cde2c5-8366-48b3-8443-58b4188054a4

Economic Considerations

Generally consistent with the forest plan.

Agriculture

Generally consistent with the forest plan, the State of Utah plan objectives below may be inconsistent with the forest plan:

Public land animal unit month (AUMs) within the State remain at or above current levels.

The State of Utah adopts a no-net-loss stance concerning grazing AUMs on Federal lands.

> Review findings: The forest plan does not include direct reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors

[3] This plan is applicable to the states of Wyoming and Utah.

could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan revision process.

Air

Generally consistent with the forest plan.

Cultural, Historical, Geological, and Paleontological Resources

Generally consistent with the forest plan.

Ditches and Canals

Generally consistent with the forest plan.

Energy Resources

Generally consistent with the forest plan.

Fire Management

Generally consistent with the forest plan.

Fisheries

Generally consistent with the forest plan.

Floodplains and River Terraces

Generally consistent with the forest plan.

Forest Management

Generally consistent with the forest plan; the Utah State Code below may be inconsistent with the forest plan:

§ 63J-4-401.(i)(iii) no roadless or unroaded evaluations or inventories are recognized or upheld beyond those that were recognized or upheld in the forest service's second roadless area review evaluation;

> Review findings: The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. Management decision in the forest plan recognize existing inventoried roadless areas; however, the Forest Service is not making any determinations for roadless areas and the plan does not include recommendations.

Irrigation

No applicable plan components in the forest plan.

Land Access

Generally consistent with the forest plan. The following concerns were outlined in the State of Utah's plan objectives, policies, and guidance:

Protecting access to all publicly owned areas of the State, including lands managed by the Bureau of Land Management, the U.S. Forest Service, the National Park Service, the U.S. Fish and Wildlife Service, and other publicly owned areas of the State.

Access to and across public lands, including R.S. 2477 roads and rights-of-way shall remain open. The right of the public to have unrestricted access to all roads granted under R.S. 2477 or FLPMA [Federal Land Policy and Management Act of 1976] Title V shall be held inviolate.

> Review findings: The forest plan provides strategic guidance, and no decisions will be made regarding the regulation of public activities and access to Federal lands, or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The system includes only those roads that are needed to serve administrative, multiple use, and public needs. The Forest Service will review access requests on a case-by-case basis in accordance with existing law and regulations.

Land Use

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Grazing allotment AUMs within the State should remain at or above current levels unless a scientific need for temporary reduction is demonstrated to the satisfaction of State officials.

In the case that AUMs are temporarily reduced, these reductions are reinstated at the earliest possible moment once vegetative health has been restored to its previous levels.

> Review findings: The forest plan does not include direct reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan revision process.

Law Enforcement

No applicable plan components in the forest plan.

Livestock and Grazing

Generally consistent with the forest plan; the plan objectives, policies, guidance, and state code below may be inconsistent with the forest plan:

AUMs within the state remain at or above current levels.

The state of Utah adopts a no-net-loss stance concerning grazing AUMs on federal lands.

- AUMs within the state remain at or above current levels unless a scientific need for temporary reduction is demonstrated to the satisfaction of state officials.
- In the case that AUMs are temporarily reduced, these reductions are reinstated at the earliest possible moment once vegetative health has been restored to its previous levels.

The State does not support the permanent retirement of any grazing allotment.

Vacant grazing allotments should be assigned to permittees affected by fire, large energy developments, or other resource disrupting activities that will cause economic disruption to permittees.

Review findings: The forest plan does not include direct reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process. The forest plan does not include direction to permanently retire any grazing allotments. FL-GD-WILDL-09 includes direction for separation of domestic sheep and goat grazing from bighorn sheep on allotments voluntarily waived without preference. This plan component does not include language to assign vacant allotments to permittees affected by resource disrupting activities. Rather, it focuses on strategies to reduce the risk of pathogen transfer, including leaving allotments vacant of domestic sheep and goats.

Utah Code 63J-4-401 (8)(h) the state opposes any additional evaluation of national forest service lands as "roadless" or "unroaded" beyond the forest service's second roadless area review evaluation and opposes efforts by agencies to specially manage those areas in a way that:

(i) closes or declassifies existing roads unless multiple side by side roads exist running to the same destination and state and local governments consent to close or declassify the extra roads;

(iii) excludes or diminishes traditional multiple- use activities, including grazing and proper forest harvesting;

(iv) interferes with the enjoyment and use of valid, existing rights, including water rights, local transportation plan rights, R.S. 2477 rights, grazing allotment rights, and mineral leasing rights;

Review findings: The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. Management decision in the forest plan recognize existing inventoried roadless areas; however, the Forest Service is not making any determinations for roadless areas and the plan does not include recommendations.

Mining and Mineral Resources

Generally consistent with the forest plan.

Noxious Weeds

Generally consistent with the forest plan.

Predator Control

No applicable plan components in the forest plan.

Recreation and Tourism

Generally consistent with the forest plan.

Riparian Areas

Generally consistent with the forest plan.

Threatened, Endangered, and Sensitive Species

Generally consistent with the forest plan.

Water Rights

No applicable plan components in the forest plan.

Water Quality and Hydrology

Generally consistent with the forest plan.

Wetlands

Generally consistent with the forest plan.

Wild and Scenic Rivers

Generally consistent with the forest plan, the state code below includes language about the addition of a river segment to the National Wild and Scenic Rivers System which, is outside of the Forest Service's purview:

Utah Code 63j-4-401(8)(a) and (b):

(8) The state planning coordinator shall recognize and promote the following findings in the preparation of any plans, policies, programs, processes, or desired outcomes relating to federal lands and natural resources on federal lands pursuant to this section:

(a) the state's support for the addition of a river segment to the National Wild and Scenic Rivers System, 16 U.S.C. Sec. 1271 et seq., will be withheld until:

(i) it is clearly demonstrated that water is present and flowing at all times;

(ii) it is clearly demonstrated that the required water related value is considered outstandingly remarkable within a region of comparison consisting of one of the three physiographic provinces in the state, and that the rationale and justification for the conclusions are disclosed;

(iii) it is clearly demonstrated that the inclusion of each river segment is consistent with the plans and policies of the state and the county or counties where the river segment is located as those plans and policies are developed according to Subsection (3);

(iv) the effects of the addition upon the local and state economies, agricultural and industrial operations and interests, outdoor recreation, water rights, water quality, water resource planning, and access to and across river corridors in both upstream and downstream directions from the proposed river segment have been evaluated in detail by the relevant federal agency;

(v) it is clearly demonstrated that the provisions and terms of the process for review of potential additions have been applied in a consistent manner by all federal agencies;

(vi) the rationale and justification for the proposed addition, including a comparison with protections offered by other management tools, is clearly analyzed within the multiple-use mandate, and the results disclosed;

(vii) it is clearly demonstrated that the federal agency with management authority over the river segment, and which is proposing the segment for inclusion in the National Wild and Scenic River System will not use the actual or proposed designation as a basis to impose management standards outside of the federal land management plan;

Review findings: Wild and Scenic Rivers are congressionally designated, and the Forest Service does not have the authority to designate waters as wild and scenic rivers. The planning rule at 36 CFR 219.10 provides for interim management of Forest Service eligible or suitable rivers or segments, to protect their values prior to a congressional decision whether to designate them as part of the National Wild and Scenic River System. This includes required plan components, including standards and guidelines, to provide for "protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system." For the Ashely National Forest, four segments were found to be eligible but not suitable for designation (Dowd Creek, Honslinger Creek, North Skull Creek, and Spring Creek 2).

Wilderness

Generally consistent with the forest plan. Establishing additional wilderness areas on the forest is inconsistent with State of Utah Resource Management Plan. Wilderness is congressionally designated, and the Forest Service does not have the authority to "classify" lands as wilderness. There are no "temporary classifications" established when a recommendation is made for a wilderness. Instead, the term, "recommended designation," should be used. The final version of the forest plan does not include recommended wilderness.

Wildlife

Generally consistent with the forest plan. The Utah state plan includes objectives for managing wildlife populations throughout Utah, which is outside of the Forest Service's purview. The Utah Division of Wildlife Resources is responsible for managing wildlife populations.

Utah Forest Action Plan Division of Forestry, Fire & State Lands (2020)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:abc57129-0534-45cf-adf9-91422fd00e98

Forest Action Plan Goals and Strategies

Generally consistent with the forest plan.

The four goals are:

1. Restore healthy and resilient trees and forests across Utah.
2. Reduce wildfire risk to communities, water resources, and other natural resource values.
3. Increase collaborative landscape-scale forest restoration activities across the State.
4. Build capacity among partners, stakeholders and communities to engage in forest restoration activities across the State.

Forest plan direction is compatible with these goals.

Utah's Coordinated Action Plan for Water (2022)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:a45b7cf8-a0c2-44d8-98f2-dfd1596606c1

Investing in Infrastructure

Consistent with forest plan.

Review findings: The forest plan includes a goal, guideline, map, and management approach related to Central Utah Project (CUP) withdrawn lands. Lands are withdrawn from the National Forest System when a parcel of land is transferred from one administrative jurisdiction (the Forest Service) to another Federal agency. Lands are withdrawn for purposes of specific federally authorized projects, such as the development, construction, maintenance, operation, and protection of Federal projects. The Ashley has approximately 57,000 acres of withdrawn lands that could be used for future infrastructure projects.

The CUP was authorized in 1956 under the Colorado River Storage Project Act (P.L. 84-485) as a participating project of the Colorado River Storage Project. The CUP is a federal water resources development project that diverts water via a system of reservoirs, tunnels, aqueducts, and other control features. The largest unit of the CUP, the Bonneville Unit, collects and distributes water in both the Uinta Basin of eastern Utah and the Bonneville Basin of central Utah. Other units of the CUP collect and distribute water solely within the Uinta Basin. CUP infrastructure on the Ashley Forest is operated through special-use authorizations. The Flaming Gorge Reservoir in the Ashley National Forest, located in Wyoming and Utah on the Green River, is 65 square miles in area is a critical part of the Colorado River Storage Project, providing water to seven states and Mexico.

Vibrant Communities

Consistent with forest plan.

Review findings: The Ashley National Forest provides critical downstream water resources in the Colorado River Basin and groundwater for local communities, including the neighboring Ute Indian Tribe, visitors, and aquatic and terrestrial plants and animals (including species at risk and valued sport fish species).

Productive Agriculture

Consistent with forest plan.

Review findings: The CUP provides water for irrigation, municipal and industrial uses with secondary benefits for aquatic habitat, open water recreation, and flood control.

Healthy Waters & Watersheds

Consistent with the forest plan.

Review findings: Protecting water resources has been recognized as one of the Forest Service's key roles in managing our national forests The Ashley provides water to the Upper Colorado River Basin and partners with water providers to protect watersheds and infrastructure from effects of wildland fire.

Utah Shared Stewardship Action Plan (2019)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:8ce5f7a2-64d5-4e72-b03c-6420d9acf97b

Shared Stewardship Action Plan

Consistent with the forest plan.

Duchesne County, Utah

Duchesne County General Plan

(Spring 1997 [Amended Winter 1998, Winter 2005, June 25, 2007, April 16, 2012, August 19, 2013, July 17, 2017, October 22, 2018 and November 18, 2019])
https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:65804da6-50f6-4fcd-a671-ad5dd6c5a437

Land Use

Generally consistent with the forest plan, although there were some policies such as opposing the imposition of Areas of Critical Environmental Concern and Visual Resource Management, which are outside of the Forest Service's scope. Additionally, the plan objectives below may be inconsistent with the forest plan:

1. Avoid loss of private lands within the county boundaries as measured by acreage and fair market value.

> Review findings: National Forest System lands are generally retained in Federal ownership to provide long-term values. The vision for the Ashley National Forest is to retain in public ownership all lands currently under its administration that meet the long-term needs of maintaining the integrity of contiguous natural ecosystems, riparian areas and wetland ecosystems, recreation and open space, scenery, clean air and water, and habitat for plant and animal populations. There are no direct plans to reduce private land ownership; however, the plan includes a vision to use the methods available to the Forest Service to acquire land rights that enhance the vision. Land exchange or acquisition will be decided on a site-specific basis.

2. Encourage disposal of federal lands to support community growth and community needs.

> Review findings: The forest plan does not include direction for disposal of federal lands. National Forest System lands are generally retained in Federal ownership to provide long-term values. The vision for the Ashley National Forest is to retain in public ownership all lands currently under its administration that meet the long-term needs of maintaining the integrity of contiguous natural ecosystems, riparian areas and wetland ecosystems, recreation and open space, scenery, clean air and water, and habitat for plant and animal populations. However, the Forest Service can dispose of lands or mineral rights that do not meet these needs. Land exchange or acquisition will be decided on a site-specific basis.

6. Discourage or eliminate land use restrictions or special designations that restrict economic growth and activity, especially on federal lands.

> Review findings: Many designated areas are congressionally designated, and the Forest Service does not have the authority to classify special designations; see Chapter 2 of the final EIS for details. The Forest Service will follow Federal policies. The Ashley National Forest has areas that contain special, exception, or unique values that provide important ecosystem system services. The designation protects the special values of the area and the ecosystem services those values provide. The plan does not include elimination of land use restrictions or special designations that restrict economic growth and activity.

Energy, Mining, and Mineral Resources

Generally consistent with the forest plan; the plan objective below is outside the scope of this planning effort:

3. Avoid unnecessary federal rules associated with fracking and master leasing plans.

> Review findings: This forest plan does not evaluate or make determinations about the suitability or availability of lands for future mineral or oil and gas leasing. Such determinations, as well as needed or appropriate lease stipulations to be applied to future oil and gas leases, would be done as a separate leasing analysis.

Agriculture

No specific plan components in the forest plan, however the Ashley National Forest provides critical downstream water resources in the Colorado River Basin and groundwater for local communities and provides water for irrigation, municipal and industrial.

Livestock & Grazing

Generally consistent with the forest plan.

Wildlife

Generally consistent with the forest plan. This plan provides direction to maintain the diversity of animal communities and support the persistence of native terrestrial wildlife species on the Ashley National Forest

Forest Management

Generally consistent with the forest plan; the forest management objective and policy for Duchesne County below may be inconsistent with the forest plan:

5. When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.

> Review findings: Livestock grazing plan direction is not considered one of the tools for fuels management.
>
> The forest plan does not include direct increases or reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in a change in AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

7. Opportunities for harvesting forest products shall be promoted, including the harvest of small diameter wood and biomass that can be used for energy, lumber, pellets, chips and other products. A study of the economic viability of forest restorative thinning projects on the Ashley National Forest should be launched.

> Review findings: The forest plan does not include a study of economic viability, but the Forest Service recognizes that timber harvesting contributes to the local economy and is an important tool used to achieve desired vegetation conditions. The forest plan includes desired conditions which provide a sustainable mix of timber products. Preparation of this type of economic viability study is not covered under the forest planning process.

Energy Considerations in Forest Management

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Policy: It is the policy of Duchesne County that special designations, such as roadless areas and wilderness should not be established in areas of the South Unit containing energy resources.

> Review findings: The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. Management decision in the forest plan recognize existing inventoried roadless areas; however, the Forest Service is not making any determinations for roadless areas and the plan does not include recommendations.

Noxious Weeds

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

10. Land management agencies should follow the recommendations of the WAFWA [Western Association of Fish and Wildlife Agencies] report on invasive plant management to help protect and restore native sagebrush ecosystems and the wildlife that depend on those systems for survival.

11. Land management agencies should follow the recommendations of the Colorado Natural Areas Program to establish integrated weed management plans that use multiple weed management techniques to control target weed species with minimal adverse impacts to non-target species.

> Review findings: The forest plan does not explicitly list the recommendations of the Western Association of Fish and Wildlife Agencies report or the Colorado Natural Areas Program; however, the plan includes goals to manage noxious weeds using an integrated forest management approach.

Predator Control

No applicable plan components in the forest plan.

Water Quality and Hydrology

Generally consistent with the forest plan.

Water Rights

No applicable plan components in the forest plan.

Irrigation

Generally consistent with the forest plan.

Ditches & Canals

No applicable plan components in the forest plan.

Flood Plains and River Terraces

No applicable plan components in the forest plan.

Wetlands

Generally consistent with the forest plan.

Riparian Areas

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

7. Use guzzlers, reservoirs, wells, and springs to attract livestock and native wildlife away from riparian areas, which can help decrease soil disturbance and impacts to aquatic resources.

> Review findings: FW-GD-SOIL-05 states that "National Core Best Management Practices and Regional Handbook soil and water conservation practices as well as project-specific design features and mitigations should be used and developed as needed to protect soils from compaction, displacement, and erosion and to maintain soil productivity." However, the forest plan does not include site-specific tactics like guzzlers, reservoirs, wells and springs.

Fisheries

Generally consistent with the forest plan.

Wild & Scenic Rivers

Generally consistent with the forest plan; the Duchesne plan objectives below may be inconsistent with the forest plan:

1. Avoid designating rivers as wild and scenic if the designation would adversely affect the economic interests of the county, including enjoyment of private property rights, mineral extraction, timber harvest, agriculture, water rights, water storage, or water delivery.

2. The county will be actively involved in all legislation that could result in designation of wild or scenic rivers within the boundaries of the county.

5. Wild and scenic rivers should be identified based on their regional and national significance rather than on their local significance. These selections should be supported by data that clearly show such selection will not negatively impact the ability of agriculture and other industry to access the water it needs and the county to develop water supplies and other resources to meet future needs. Where such impacts are unavoidable, a plan to mitigate such impacts should be presented.

> Review findings: Wild and scenic rivers are congressionally designated; the Forest Service does not have the authority to designate waters as wild and scenic rivers. The planning rule at 36 CFR 219.10 provides for interim management of Forest Service eligible or suitable rivers or segments to protect their values prior to a congressional decision whether to designate them as part of the National Wild and Scenic River System. This includes required plan components, including standards and guidelines, to provide for "protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system." For the Ashely National Forest, four segments were found to be eligible but not suitable for designation (Dowd Creek, Honslinger Creek, North Skull Creek, and Spring Creek 2).

Recreation & Tourism

Generally consistent with the forest plan.

Fire Management

Generally consistent with the forest plan.

Land Access

Roadless Areas

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Policies: Duchesne County opposes any additional evaluation of national forest service lands as "roadless" or "un-roaded" beyond the forest service's second roadless area review evaluation and opposes efforts by agencies to specially manage those areas in a way that:

1. Closes or declassifies existing roads unless multiple side by side roads exist running to the same destination and state and local governments consent to close or declassify the extra roads;

2. Permanently bars travel on existing roads;

3. Excludes or diminishes traditional multiple-use activities, including grazing and proper forest harvesting;

4. Interferes with the enjoyment and use of valid, existing rights, including water rights, local transportation plan rights, R.S. 2477 rights, grazing allotment rights, and mineral leasing rights; or

5. Prohibits development of additional roads reasonably necessary to pursue traditional multiple-use activities.

Duchesne County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially within the County and their suggested future management classifications as set forth in Appendix D of this plan.

Duchesne County supports efforts by the State of Utah to petition the Department of Agriculture and Congress to establish new management provisions for Inventoried Roadless Areas across the state, incorporating the recommendations set forth in Appendix D.

> Review findings: The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. Management decisions in the forest plan recognize existing inventoried roadless areas; however; the Forest Service is not making any determinations for roadless areas and the plan does not include recommendations. The forest plan does not consolidate, delete, adjust boundaries, or re-inventory existing inventoried roadless areas.
>
> Determinations about which roads and trails will be open or closed to specific types of motorized and nonmotorized uses are not addressed at the forest plan level; however, the forest plan may provide context and guidance for future travel management decisions which may be inconsistent with Duchesne County General Plan as detailed below:

- FW-GD-RMZ-04: "Construction of new roads, temporary roads, and motorized trails should be avoided in RMZs to maintain and protect aquatic resources and water quality, except as follows . . ." This direction may limit construction of new roads in certain areas.
- FW-GD-ROAD-02: "Wetlands and unstable areas should be avoided when reconstructing roads or constructing new roads and landings. Impacts should be mitigated where necessary when avoidance is not practical." This direction may limit construction of new roads in certain areas.
- Recreation opportunity spectrum classes provide activities from roaded natural to primitive setting. The recreation opportunity spectrum classes primitive and semiprimitive nonmotorized may restrict development of additional roads in the future.

Road closures

Generally consistent with the forest plan.

Cultural, Historical, Geological, and Paleontological Resources

Generally consistent with the forest plan.

Threatened, endangered & sensitive species

Generally consistent with the forest plan; Duchesne County plans contained objectives related to wildlife management (i.e., species delisting and predator reintroduction) which are outside of the Forest Service's purview.

Wilderness

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

1. Avoid designation of additional areas within the county as federally designated wilderness, wilderness study areas or roadless areas.

2. Release WSAs [Wilderness Study Areas] not recommended for designation as wilderness by U.S. Congress for uses other than preservation of wilderness character and multiple-use sustained yield management.

3. Avoid management of any additional federal lands within the county as non-WSA [Wilderness Study Area] lands with wilderness characteristics, natural areas, inventoried roadless areas, or similarly intentioned management regimes.

4. Remove management provisions from federal lands that promote their management for wilderness characteristics and roadless qualities over other uses consistent with the multiple-use and sustained-yield management standard.

> Review findings: Wilderness is congressionally designated, and the Forest Service does not have the authority to "classify" lands as wilderness. There are no "temporary classifications" established when a recommendation is made for a wilderness. Instead, the term "recommended designation" should be used. The final forest plan does not include new recommended wilderness. Existing recommended wilderness areas would continue to be recognized as such.

The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. Management decision in the forest plan recognize existing inventoried roadless areas; however, the Forest Service is not making any determinations for roadless areas, and the plan does not include recommendations.

Law Enforcement

No applicable plan components in the forest plan.

Economic Considerations

Generally consistent with the forest plan.

Air

Generally consistent with the forest plan.

Vegetation Management

Generally consistent with the forest plan.

Resource Management Plan for the Twin Knolls/Wrinkles Road Region of Duchesne County

No applicable plan components in the forest plan.

Daggett County, Utah

2017 Daggett County General Plan Chapter 8 – Resource Management Plan (2017)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:ab9fc388-d7a6-4f2c-ada2-aca2247af1db

Resource Management Objectives

Resource Management Objectives

Generally consistent with the forest plan.

Resource Management Actions and Objectives

Generally consistent with the forest plan.

Accomplishing County Objectives

Generally consistent with the forest plan.

County Resource Management Issues

Demand

No applicable plan components in the forest plan.

County Administrative Capacity

No applicable plan components in the forest plan.

Policy Management

No applicable plan components in the forest plan.

Partnerships

No applicable plan components in the forest plan.

Data Accuracy

Generally consistent with the forest plan.

Development Opportunities

Generally consistent with the forest plan.

Appendix – Public Lands Element

Agriculture

Generally consistent with the forest plan.

Air Quality

Generally consistent with the forest plan.

Cultural Resources

Generally consistent with the forest plan.

Ditches and Canals

Generally consistent with the forest plan.

Energy

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

3. Avoid unnecessary federal rules associated with fracking and master leasing plans.

7. Eliminate or reduce the amount of federal agency approval requirements for development to simplify and encourage investment in the area.

> Review findings: This forest plan does not evaluate or make determinations about the suitability or availability of lands for future mineral or oil and gas leasing. Such determinations, as well as needed or appropriate lease stipulations to be applied to future oil and gas leases, would be done as a separate leasing analysis.
>
> Existing Federal and local laws, regulations, and legal decisions guide much of how or if particular minerals and energy management actions should take place. The energy and minerals plan components in the forest plan do not need to reiterate overarching Federal and local laws, regulations, and policies, which must be implemented, and they do not eliminate or reduce approval requirements for development. However, one of the goals in the forest plan (FW-GO-MINL-01) states: "The Ashley National Forest will be responsive to requests for exploration and development of energy and mineral resources. It encourages responsible mineral and energy

exploration, development, and reclamation, in accordance with applicable mining and leasing laws and regulations."

4. Withhold county support for mineral development provisions within federal land management plans until the appropriate land management plan and environmental impact statement clearly demonstrate the following:

- That the authorized planning agency has considered and evaluated the mineral and energy potential in all areas of the planning area as if the areas were open to mineral development under standard lease agreements.
- That a baseline is established from which the effect of management prescriptions can be analyzed and evaluated for its impact on the area's baseline mineral and energy potential.
- That the development provisions do not unduly restrict access to public lands for energy exploration and development.
- That the authorized planning agency has supported any closure of additional areas to mineral leasing and development or any increase of acres subject to NSO restrictions by adhering to
  - the relevant provisions of the Federal Land Policy and Management Act, 43 United States Code 1701 et seq;
  - other controlling mineral development laws; and
  - the withdrawal and reporting procedures set forth in the Federal Land Policy and Management Act, 43 United States Code 1701 et seq.
- That the authorized planning agency has evaluated whether to repeal any moratorium that may exist on the issuance of additional mining patents and oil and gas leases.

Review findings: The forest plan does not include the consideration and evaluation of mineral and energy potential, but the plan does have desired conditions under which exploration and development of energy and mineral resources continue to contribute to jobs, income, and raw materials to the local and national economy. The plan does not include direct restrictions, but there might be site-specific restrictions as environmental impacts from energy and mineral exploration are effectively avoided, minimized, or mitigated, consistent with valid existing rights, to protect ecosystem integrity. The forest plan is not making any decisions about lands to be made available for future mineral leasing or about lease stipulations that would apply to new mineral leases. Such decisions would be made through a separate leasing analysis process. The Forest does not anticipate any new mineral leasing until a new formal leasing analysis has been completed

Fire Management

Generally consistent with the forest plan.

Fisheries

Generally consistent with the forest plan.

Floodplains & River Terraces

Generally consistent with the forest plan.

Forest Management

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

5. When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.

> Review findings: Livestock grazing plan direction is not considered one of the tools for fuels management.
>
> The forest plan does not include direct increases or reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

8. Reduce time required for National Environmental Policy Act processes associated with timber harvests so that economic benefits can be maximized.

> Review findings: The forest plan does not make decisions about the National Environmental Policy Act processes, and it follows the Federal requirements.

Irrigation

No applicable plan components in the forest plan.

Land Access

Generally consistent with the forest plan.

Land Use

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

4. Ensure that adjacent land uses and land use restrictions do not deny private property owners the right of fair use, access to, and enjoyment of their property.

> Review findings: The forest plan provides strategic guidance, and no decisions will be made regarding the regulation of public activities and access to Federal lands or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The National Forest System includes only those roads that are needed to serve administrative, multiple use, and public needs. The forest plan will review access requests on a case-by-case basis.

Law Enforcement

No applicable plan components in the forest plan.

Livestock and Grazing

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

1. Maintain cattle and sheep grazing on BLM, U.S. Forest Service, State Lands, and SITLA [School and Institutional Trust Lands Administration] lands at historic levels.

2. Maintain cattle and sheep grazing on BLM, U.S. Forest Service, State Lands, and SITLA [School and Institutional Trust Lands Administration] lands at historic seasons of use.

> Review findings: The forest plan does not include direct increases or reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

3. Avoid the reduction of grazing to support wildlife, especially non-native species.

> Review findings: Wildlife introduction is outside of the Forest Service's purview and would be determined and put into effect by the Utah Division of Wildlife Resources. The plan does not include grazing allotments for wildlife.

Mineral Resources

Generally consistent with the forest plan.

Mining

Generally consistent with the forest plan.

Noxious Weeds

Generally consistent with the forest plan.

Predator Management

No applicable plan components in the forest plan; Daggett County Plans included objectives related to predator management, which are outside of the Forest Service's purview and would be determined and put into effect by the Utah Division of Wildlife Resources.

Recreation and Tourism

Generally consistent with the forest plan.

Riparian Areas

Generally consistent with the forest plan.

Threatened, Sensitive and Endangered Species

Generally consistent with the forest plan; Daggett County plans contained objectives related to wildlife management (i.e., species delisting and predator reintroduction), which are outside of the Forest Service's purview.

Water Quality & Hydrology

Generally consistent with the forest plan.

Water Rights

No applicable plan components in the forest plan.

Wetlands

Generally consistent with the forest plan.

Wild & Scenic Rivers

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Avoid designating rivers as wild and scenic if the designation would adversely affect the economic interests of the county, including enjoyment of private property rights, mineral extraction, timber harvest, agriculture, water rights, water storage, or water delivery.

> Review findings: Wild and scenic rivers are congressionally designated; the Forest Service does not have the authority to designate waters as wild and scenic rivers. The planning rule at 36 CFR 219.10 provides for interim management of Forest Service eligible or suitable rivers or segments to protect their values prior to a congressional decision whether to designate them as part of the National Wild and Scenic River System. This includes required plan components, including standards and guidelines, to provide for "protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system."

Wilderness and Wilderness Study Areas

Daggett County plans contained objectives related to discontinuing Wilderness Study Areas (WSAs), which are outside of the Forest Service's purview.

Daggett County plans contained objectives related to Inventoried Roadless Area Designations, which are generally inconsistent with the forest plan:

Forest Service Inventoried Roadless Area Designations

All existing Forest Service Inventoried Roadless Area Designations in Daggett County, whether set forth in the above findings or otherwise, should be permanently discontinued and placed by the Forest Service back into regular multiple use and sustained yield management

> Review findings: The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. The Forest Service is not making any determinations for roadless areas, and the plan does not include recommendations.

Wild or Feral Horses

No applicable plan components in the forest plan.

Wildlife

Generally consistent with the forest management plans, Daggett County plans contained objectives related to wildlife management (i.e., preventing reintroduction of wild horses and minimizing wildlife-vehicle collisions) which are outside of the Forest Service's purview.

Uintah County, Utah

Uintah County Resource Management Plan (2017)

Uintah_CRMP_2019_.pdf (Review) - Adobe cloud storage

Agriculture

No applicable plan components in the forest plan.

Air Quality

Generally consistent with the forest plan.

Cultural, Historical, Geological, and Paleontological Resources

Generally consistent with the forest plan; the plan objective below may be inconsistent with the forest plan:

4.4.13 Federal and state agencies must not jeopardize private property rights or existing land uses, such as oil and gas exploration, mining, logging and harvesting of forest products, road maintenance, and grazing, through the protection of cultural and archaeological sites. This can be accomplished by carefully assessing the sensitivity and importance of the site relative to the economic and cultural impacts associated with land management decisions based around cultural and archaeological sites in the Uintah Basin.

> Review findings: The forest plan does not include direct restrictions on existing land uses through the management of cultural and historic resources. However, the plan states that the adverse effects on cultural resources eligible to the National Register of Historic Places shall be avoided, minimized, or mitigated for all projects, activities, permits, or actions on National Forest System lands in accordance with section 106 of the National Historic Preservation Act, as specified in 36 CFR 800. This is done in consultation with the appropriate State Historic Preservation Officers, Tribal Historic Preservation Officer, Native American Tribes, local governments, and other consulting parties. Any restrictions will be determined on a site-specific basis.

Ditches, Canals, and Pipelines

No applicable plan components in the forest plan.

Energy

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

6.4.3 Maintain federal lands available for oil and gas leasing and development with least restrictive stipulations while considering the impacts to other public land resources and uses.

6.4.4 Avoid unnecessary federal rules associated with hydraulic fracturing and master leasing plans.

6.4.5 Withhold county support for mineral development provisions within federal land management plans until the appropriate land management plan and environmental impact statement clearly demonstrate the following:

- That the authorized planning agency has considered and evaluated the mineral and energy potential in all areas of the planning area as if the areas were open to mineral development under standard lease agreements.
- That a baseline is established from which the effect of management prescriptions can be analyzed and evaluated for its impact on the area's baseline mineral and energy potential.
- That the development provisions do not unduly restrict access to public lands for energy exploration and development.
- That the authorized planning agency has supported any closure of additional areas to mineral leasing and development or any increase of acres subject to NSO restrictions by adhering to the relevant provisions of the Federal Land Policy and Management Act, 43 United States Code 1701 et seq.; other controlling mineral development laws; and the withdrawal and reporting procedures set forth in the Federal Land Policy and Management Act, 43 United States Code 1701 et seq.
- That the authorized planning agency has evaluated whether to repeal any moratorium that may exist on the issuance of additional mining patents and oil and gas leases.

6.4.10 Eliminate or reduce the amount of federal agency approval requirements for development to simplify and encourage investment in the area.

6.4.24 Open all federal lands shown to have reasonable mineral potential leasing with stipulations and conditions that will analyze resource values.

6.4.25 Call upon the federal agencies who administer lands within the Uintah Minerals Management Plan to do the following:

- Fully cooperate and coordinate with the county to develop, amend, and implement land and resource management plans and to implement management decisions that are consistent with the purposes, goals, and policies described in this plan to the maximum extent allowed under federal law.
- Expedite the processing, granting, and streamlining of mineral and energy leases and applications to drill, extract, and otherwise develop all existing energy and mineral resources located within the Uintah Basin Energy Zone, including oil, natural gas, oil shale, oil sands, gilsonite, phosphate, gold, uranium, copper, solar, and wind resources.
- Allow continued maintenance and increased development of roads, power lines, pipeline infrastructure, and other utilities necessary to achieve the goals, purposes, and policies described in this section.
- Refrain from any planning decisions and management actions that will undermine, restrict, or diminish the goals, purposes, and policies for the Uintah Minerals Management Plan.
- Refrain from implementing any policy that is contrary to the goals and purposes of the Uintah Minerals Management Plan.

Review findings: Existing Federal and local laws, regulations, and legal decisions guide much of how or if particular minerals and energy management actions should take place. The energy and minerals plan components in the forest plan do not need to reiterate overarching Federal and local

laws, regulations, and policies, which must be implemented, and they do not eliminate or reduce Federal agency approval requirements. However, one of the goals in the forest plan (FW-GO-MINL-01) states: "The Ashley National Forest will be responsive to requests for exploration and development of energy and mineral resources. It encourages responsible mineral and energy exploration, development, and reclamation, in accordance with applicable mining and leasing laws and regulations."

This forest plan does not evaluate or make determinations about the suitability or availability of lands for future mineral or oil and gas leasing and would not open all Federal lands shown to have reasonable mineral potential leasing.

Fire Management

Generally consistent with the forest plan; the plan objective below may be inconsistent with the forest plan:

7.4.5 When sustainable and based on scientific knowledge and local data, increase grazing (allotments, AUMs, or seasonal use) to reduce fuel loads.

Review findings: Livestock grazing plan direction is not considered one of the tools for fuels management.

The forest plan does not include direct reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

Fisheries

Generally consistent with the forest plan.

Floodplains And River Terraces

Generally consistent with the forest plan.

Forest Management

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

10.4.5 When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.

Review findings: Livestock grazing plan direction is not considered one of the tools for fuels management.

The forest plan does not include direct reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in

decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

10.4.33 Uintah County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially with in the county and their suggested future management classifications.

Review findings: The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. Management decision in the forest plan recognize existing inventoried roadless areas; however, the Forest Service is not making any determinations for roadless areas, and the plan does not include recommendations.

Irrigation

Generally consistent with the forest plan.

Land Access

Generally consistent with the forest plan; the plan objectives below are not within the scope of this planning effort.

12.4.12 The County does not support the closure of any more Forest Service roads. The County Supports re-opening of the closed Forest Service roads.

Review findings: The forest plan provides strategic guidance, and no decisions will be made regarding the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The system includes only those roads that are needed to serve administrative, multiple use, and public needs.

Land Use Policy

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

13.3.1 Discourage or eliminate land use restrictions or special designations that restrict economic growth and activity, especially on federal lands.

Review findings: Many designated areas are congressionally designated, and the Forest Service does not have the authority to classify special designations. The Forest Service will follow Federal policies. The Ashley National Forest has areas that contain special, exception, or unique values that provide important ecosystem system services. The designation protects the special values of the area and the ecosystem services those values provide. The plan does not include elimination of land use restrictions or special designations that restrict economic growth and activity.

13.3.2 Federal lands shall be available for disposal when lands are difficult to manage or lie in isolated tracts, when such disposal meets the important public objective of community expansion or economic development, or when the disposal would serve the public interest.

13.3.3 There shall be no net loss of the private lands within the county. No “net loss” shall be measured in acreage and in fair market value.

Review findings: The forest plan does not include direction for disposal of Federal lands. National Forest System lands are generally retained in Federal ownership to provide long-term values. The vision for the Ashley National Forest is to retain in public ownership all lands currently under its administration that meet the long-term needs of maintaining the integrity of contiguous natural ecosystems, riparian areas and wetland ecosystems, recreation and open space, scenery, clean air and water, and habitat for plant and animal populations. However, the Forest Service would dispose of lands or mineral rights that do not meet these needs. Land exchange or acquisition will be decided on a site-specific basis.

Law Enforcement

Generally consistent with the forest plan.

Livestock And Grazing

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

15.4.1 Maintain cattle and sheep grazing on BLM and U.S. Forest Service lands at historic levels and historic seasons of use.

15.4.3 Manage lands to maintain or increase forage allocation for livestock grazing. Require annual checking and verification that lands are still up to standard.

15.4.4 Public land agencies should not decrease livestock grazing permits and grazing allocations below present levels considering the impacts of fire and drought.

15.4.5 The county does not support retirement of any grazing units through purchase or conversion of permits.

Review findings: The forest plan does not include direct reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

15.4.14 Wildlife target levels and/or populations must not exceed the forage assigned in the resource management plan forage allocations. Revise allocations as appropriate using recent forage data.

Review findings: The forest plan does not include grazing allotments for wildlife. The Utah Division of Wildlife Resources manages wildlife in the state.

15.4.17 The county recognizes grazing permits on public lands as an asset, which may be transferred by the permit owner. Such transactions must be processed by the land management agency promptly after proper notification. Any reduction in the size of the permit or forage allocation as a result of the transaction shall not be made without a specific scientific justification.

Review findings: The Forest Service does not recognize a financial value of a Term Grazing Permit (36 CFR 222.3(b).

15.4.18 When grazing permits are withdrawn from a livestock operator because of grazing violations, the permit should not be reallocated to other uses and should be made available for continued livestock use as soon as possible.

15.4.22 These guidelines and policies should be promptly, fully, and diligently implemented and made available to all federal agencies with land management responsibilities with Uintah County and to all holders of permits for grazing in the wilderness areas designated by Congress. The guidelines and policies are as follows:

- There shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly "phase out" grazing. Any adjustments in the numbers of livestock permitted to graze in wilderness areas should be made as a result of revisions in the normal grazing and land management planning and policy setting process, giving consideration to legal mandates, range condition, and the protection of the range resource from deterioration…
- The replacement or reconstruction of deteriorated facilities or improvements should not be required to be accomplished using "natural materials", unless the material and labor costs of using natural materials are such that their use would not impose unreasonable additional costs on grazing permittees…

  Review findings: The forest plan does not include direct reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

Mining And Mineral Resources

Generally consistent with the forest plan.

Noxious Weeds

Generally consistent with the forest plan.

Predator Control

No applicable plan components in the forest plan, the Uintah County Plan contained objectives related to wildlife management (i.e. predator control) which are outside of the Forest Service's purview and Wildlife introduction is outside of the Forest Service's purview and would be determined and put into effect by the Utah Division of Wildlife Resources.

Recreation And Tourism

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

19.4.8 BLM or U.S. Forest Service must coordinate and consult closely with county and municipal governments on any proposals for special designations (Special Recreation Management Areas, wilderness, etc.) that may affect current and future recreation use.

Review findings: Many designated areas are congressionally designated, and the Forest Service does not have the authority to classify special designations. The Forest Service will follow federal

policies. The Ashley National Forest has areas that contain special, exception, or unique values that provide important ecosystem system services. The designation protects the special values of the area and the ecosystem services those values provide. The plan does not include elimination of land use restrictions or special designations that restrict economic growth and activity.

Riparian And Wetland Areas

Generally consistent with the forest plan.

Threatened, Endangered and Sensitive Species

Generally consistent with the forest plan; Uintah County plans contained objectives related to wildlife management (i.e. species delisting and predator reintroduction) which are outside of the Forest Service's purview.

Water Quality And Hydrology

Generally consistent with the forest plan.

Water Rights

No applicable plan components in the forest plan.

Wild and Scenic Rivers

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

24.4.1 Avoid designating rivers as wild and scenic if the designation would adversely affect the economic interests of the county, including enjoyment of private property rights, mineral extraction, timber harvest, agriculture, water rights, water storage, or water delivery.

> Review findings: Wild and Scenic Rivers are congressionally designated, and the Forest Service does not have the authority to designate waters as wild and scenic rivers. The planning rule at 36 CFR 219.10 provides for interim management of Forest Service eligible or suitable rivers or segments, to protect their values prior to a congressional decision whether to designate them as part of the National Wild and Scenic River System. This includes required plan components, including standards and guidelines, to provide for "protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system." For the Ashely National Forest, four segments were found to be eligible but not suitable for designation (Dowd Creek, Honslinger Creek, North Skull Creek, and Spring Creek 2).

Wilderness

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

25.4.1 The County does not support designation of additional areas within the County as federally designated wilderness.

> Review findings: Wilderness is congressionally designated, and the Forest Service does not have the authority to "classify" lands as wilderness. There are no "temporary classifications"

established when a recommendation is made for a wilderness. Instead, the term "recommended designation" should be used. The final forest plan does not include recommended wilderness.

Wildlife

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

26.4.11 Wildlife populations shall not be increased nor shall new species be introduced until forage allocations have been provided and an impact analysis that includes participation and concurrence by the county, wildlife management agencies, public land management agencies, and private landowners is completed for the effects on other wildlife species and livestock.

26.4.12 Reduction in forage allocation resulting from forage studies, drought, or other natural disasters will be shared proportionately by wildlife, livestock, and other uses.

Review findings: Wildlife introduction is outside of the Forest Service's purview and would be determined and put into effect by the Utah Division of Wildlife Resources. The plan does not include grazing allotments for wildlife.

Ashley Karst National Recreation and Geologic Area

Generally consistent with the forest plan.

John Wesley Powell National Conservation Area

No applicable plan components in the forest plan.

Summit County, Utah

Summit County Resource Management Plan (2017)

https://ut-summitcounty2.civicplus.com/DocumentCenter/View/5783/Summit-County_RMP_CC-Draft-3_170627-PDF

Water Resources

Wild and Scenic Rivers (W&SR)

Generally consistent with the forest plan.

Riparian Areas (RA)

Generally consistent with the forest plan.

Hydrology and Water Quality (H&WQ)

Generally consistent with the forest plan.

Flood Plains and River Terraces (F&RT)

Generally consistent with the forest plan.

Wetlands (W)

Generally consistent with the forest plan.

Water Rights (WR)

No applicable plan components in the forest plan.

Natural and Cultural Resources

Fisheries (F)

Generally consistent with the forest plan.

Wildlife (WLF)

Generally consistent with the forest plan; the Summit County plan included objectives to reduce adverse wildlife/public interactions by installing wildlife barriers and deterrents where road safety is an issue which falls outside of the Forest Service's purview.

Wilderness (WI)

Generally consistent with the forest plan.

Air Quality (AQ)

Generally consistent with the forest plan.

Threatened, Endangered, and Sensitive Species (TESS)

Generally consistent with the forest plan.

Wildfire Management (WM)

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

WM Strategy 1.1.4: Consider including targeted grazing strategies as a policy to reduce fuel loads and reduce the risk of wildfires where appropriate throughout the County.

> Review findings: Livestock grazing plan direction is not considered one of the tools for fuels management.

Forest Management (FM)

Generally consistent with the forest plan.

Cultural, Historical, Geological, and Paleontological Resources (CHGP)

Generally consistent with the forest plan.

Agricultural Resources

Noxious Weeds (NW)

Generally consistent with the forest plan.

Agricultural (AG)

Generally consistent with the forest plan.

Livestock and Grazing (L&G)

Generally consistent with the forest plan.

Irrigation, Ditches, and Canals (IDC)

No applicable plan components in the forest plan.

Predator Control (PC)

Generally consistent with the forest management plan; the plan objectives included objectives to regularly evaluate predator populations and livestock losses related to wild predators, which falls outside of the Forest Service's purview. Wildlife management would be determined and put into effect by the Utah Division of Wildlife Resources.

Land Resources

Recreation and Tourism (R&T)

Generally consistent with the forest plan.

Economic Considerations (EC)

Generally consistent with the forest plan.

Energy Resources (ER)

No applicable plan components in the forest plan.

Mineral Resources and Mining (MR & M)

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

MR & M Objective 2: Work to prevent new mining and mineral claims and leases on lands within the proposed additional wilderness discussed under Wilderness Resources.

> Review findings: Existing Federal and local laws, regulations, and legal decisions guide much of how or if particular minerals and energy management actions should take place. The energy and minerals plan components in the forest plan do not need to reiterate overarching Federal and local laws, regulations, and policies, which must be implemented. However, one of the goals in the forest plan (FW-GO-MINL-01) states: "The Ashley National Forest will be responsive to requests for exploration and development of energy and mineral resources. It encourages responsible mineral and energy exploration, development, and reclamation, in accordance with applicable mining and leasing laws and regulations." The forest plan is not making any decisions about lands to be made available for future mineral leasing or about lease stipulations that would apply to new mineral leases. Such decisions would be made through a separate leasing analysis process. The Forest does not anticipate any new mineral leasing until a new formal leasing analysis has been completed

Land Use (LU)

Generally consistent with the forest plan.

Law Enforcement (LE)

No applicable plan components in the forest plan.

Land Access (LA)

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

LA Objective 1.3: Ensure that access to the Little West Fork Blacks area is maintained in future Forest Plan revisions.

> Review findings: The forest plan provides strategic guidance, and no decisions will be made regarding the regulation of public activities and access to Federal lands or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The system includes only those roads that are needed to serve administrative, multiple use, and public needs. The forest plan will review access requests on a case-by-case basis.

Scenic Resources (SR)

Generally consistent with the forest plan.

Utah County, Utah

Utah County General Plan (2020)

Utah County: General Plan (municipalcodeonline.com)

Most of the plan objectives did not contain components that were applicable to the forest plan. Objectives 9, 10, 12, 13, and 14 contained plan components concerning recreational areas, historical sites, transportation, natural resources and open space, and water resources, all of which were generally consistent with the forest plan.

Utah County Resource Management Plan (2017)

Land Use

Generally consistent with the forest plan; the Utah County plans also contains a policy about consultation for dark sky regulations and a public shooting range, which are outside of the Forest Service's purview. There are no decisions in the plan related to dark sky designations or shooting ranges.

Economic Considerations

Generally consistent with the forest plan.

Agriculture

Generally consistent with the forest plan.

Air Quality

Generally consistent with the forest plan; Utah County plans contained the plan objective below which may be inconsistent with the forest plan:

12.10.E.1. Agencies should establish forest management programs that encourage fuel reduction of forests and wildlands by means other than burning, utilizing all means of fuel reduction including but not limited

to: logging, forest thinning, and chipping, brush mastication, livestock grazing, herbicide use, and public firewood utilization.

> Review findings: Livestock grazing plan direction is not considered one of the tools for fuels management. However, the forest plan does describe how the full range of wildland fire and fuels management activities is used to achieve ecosystem sustainability and ecological resilience.

Canals And Ditches

Generally consistent with the forest plan; Utah County plans contain objectives related to management and protection of canals, which is outside of the Forest Service's purview.

Cultural, Historical, Paleontological, And Geological

Generally consistent with the forest plan.

Energy Resources

Generally consistent with the forest plan; there are some goals and objectives concerning development that are not applicable to the forest plan.

Fire Management

Generally consistent with the forest plan, including direction to coordinate with the Forest Service on issues such as reduction of wildfire hazards in the wildland-urban interface on public lands.

Fisheries

Generally consistent with the forest plan.

Floodplains And River Terraces

Generally consistent with the forest plan.

Forest Management

Generally consistent with the forest plan.

Irrigation

No applicable plan components in the forest plan.

Land Access

Generally consistent with the forest plan; the plan objectives below are beyond the scope of this planning effort:

12.28.D.10 Cooperate with the Forest Service to upgrade certain Forest Service roads in preparation to improve those roads into Class B roads.

12.28.D.20 The County supports the recognition by the federal government of the public use of R.S. 2477 rights-of-way and urges the federal government to administratively and formally recognize the rights-of-way and their use by the public as expeditiously as possible.

> Review findings: The forest plan provides strategic guidance, and no decisions will be made regarding the regulation of public activities and access to Federal lands or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The

system includes only those roads that are needed to serve administrative, multiple use, and public needs. The forest plan will review access requests on a case-by-case basis. The forest plan does include FW-GD-LAND-01, which states: "To provide public and administrative access to National Forest System lands, land adjustments should include reciprocal right-of-way acquisitions when feasible."

Law Enforcement

No applicable plan components in the forest plan.

Livestock and Grazing

Generally consistent with the forest plan.

Mineral Resources

Generally consistent with the forest plan; Utah County plans contain objectives related to ensuring that all mineral development activities within the county are bonded to cover 100 percent of the reclamation costs, which is outside of the Forest Service's purview. The Forest Service is not making decisions about bonding requirements in the forest plan.

Mining

Generally consistent with the forest plan.

Noxious Weeds

Generally consistent with the forest plan.

Predator Control

Generally consistent with the forest plan; the plan objectives include objectives to balance predators with native plants and animals, along with private property rights and economic needs in the county, which is outside of the Forest Service's purview. Wildlife management is outside of the Forest Service's purview and would be determined and put into effect by the Utah Division of Wildlife Resources.

Recreation and Tourism

Generally consistent with the forest plan.

Riparian Areas

Generally consistent with the forest plan.

Threatened, Endangered, and Sensitive Species

Generally consistent with the forest plan; Utah County plans contain objectives related to wildlife management (i.e., species delisting) which are outside of the Forest Service's purview.

Water Quality and Hydrology

Generally consistent with the forest plan.

Water Rights

No applicable plan components in the forest plan.

Wetlands

Generally consistent with the forest plan.

Wild and Scenic Rivers

Generally consistent with the forest plan.

Wilderness Areas

Generally consistent with the forest plan; the plan objective below is beyond the scope of this planning effort:

12.56.D.4. The county opposes the designation of new wilderness areas.

> Review findings: Wilderness is congressionally designated, and the Forest Service does not have the authority to "classify" lands as wilderness. There are no "temporary classifications" established when a recommendation is made for a wilderness. Instead, the term "recommended designation" should be used. The final version of the forest plan does not include recommended wilderness.

Wildlife

Generally consistent with the forest plan.

Pipelines and Infrastructure

No applicable plan components in the forest plan.

Utility Corridors

Generally consistent with the forest plan.

State of Wyoming

State of Wyoming Game and Fish Department Habitat Plans

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:4d610b59-0e90-43c8-94b5-6537e41f50ab

Wyoming Game & Fish Department Statewide Habitat Plan (2020)

Statewide Habitat Plan Goals

Generally consistent with the forest plan.

Statewide Habitat Plan Revision

Generally consistent with the forest plan.

Priority Areas

Generally consistent with the forest plan.

Project Habitat Development and Funding

No applicable plan components in the forest plan.

Climate Change

No applicable plan components in the forest plan.

Goals, Strategies, and Actions

Generally consistent with the forest plan.

Wyoming Forest Action Plan Wyoming Statewide Forest Resource Assessment and Forest Resource Strategy (2020)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:41bb0fdc-8ba2-4875-be44-5387f87ee5bc

Development Risk

Generally consistent with the forest plan.

Forest Fragmentation

Generally consistent with the forest plan.

Wildfire Risk

Generally consistent with the forest plan.

Forest Health Risk

Generally consistent with the forest plan.

Fish and Wildlife Habitat—Terrestrial Habitat

Generally consistent with the forest plan.

Fish and Wildlife Habitat—Aquatic Habitat

Generally consistent with the forest plan.

Water Quality and Supply

Generally consistent with the forest plan.

Economic Potential—Working Forests

Generally consistent with the forest plan.

Economic Potential—Mill Demand Forests

Generally consistent with the forest plan.

Green Infrastructure

Generally consistent with the forest plan.

Community Forestry

Generally consistent with the forest plan.

Rural Forestry Assistance Potential

Generally consistent with the forest plan.

Sweetwater County, Wyoming

Sweetwater County Federal Lands and Resources Plan (FLRP) (2022)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:52307d5e-d360-4523-bed5-f8d60551c7c2

Land Use Policy

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

2.2.2 Sweetwater County discourages and vigorously opposes federal land use restrictions or special designations that eliminate multiple uses and constrain economic growth and activity. The exception applies to federal land reserved for specific purposes, including the Flaming Gorge National Recreation Area, where the County supports the statutory withdrawal from mining and no oil and gas leasing.

> Review findings: Many designated areas are congressionally designated, and the Forest Service does not have the authority to classify special designations. The Forest Service will follow federal policies. The Ashley National Forest has areas that contain special, exception, or unique values that provide important ecosystem system services. The designation protects the special values of the area and the ecosystem services those values provide. The plan does not include elimination of land use restrictions or special designations that restrict economic growth and activity. No new wilderness areas are recommended in the proposed Forest plan.

2.2.10 The County opposes the use of federal buffer zones beyond the scope and boundaries of the wilderness designations and wilderness study areas (WSAs). Lands should only be managed as wilderness when they have been designated by Congress.

> Review findings: The term "federal buffer zones" is not accurate in this context. The Forest Service does not buffer designated wilderness. Areas that are recommended for wilderness are managed to protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.

Agriculture

Generally consistent with the forest plan.

Air Quality

Generally consistent with the forest plan.

Cultural, Historical, Geological, and Paleo Resources

Generally consistent with the forest plan.

Ditches, Canals, and Pipelines

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

The regulatory system that authorizes rights-of-way across federal land for the transport of water applies equally to the transport of natural gas and oil.

Review findings: This is not consistent with Forest Service understanding in that the regulatory system that authorizes the transport of water is not the same as the regulatory system for natural gas and oil.

Energy

Generally consistent with the forest plan.

Coal and Electricity

No applicable plan components in the forest plan.

Oil and Gas Sector

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

7.2.7.1 The County policy will require that federal land management plans and environmental impact statements demonstrate the following:

• That the authorized planning agency has considered and evaluated the mineral and energy potential in the planning area using the assumption that all areas are open to mineral development under standard lease terms unless federal law provides otherwise.

• That the federal agency disclosed the effect and increased cost of management prescriptions and proposed lease stipulations when measured against the area's baseline mineral and energy potential. • That the development provisions do not unduly restrict access to public lands for energy exploration and development.

• That the federal agency documented the proposed closure of additional areas to mineral leasing and development or any increase of acres subject to no surface occupancy restrictions and that any closure was proposed as a withdrawal or management decision consistent with the Energy Policy Act and FLPMA.

• That the federal agency also considered the revocation of any moratorium, formal or informal, that may exist on the issuance of additional mining patents and suspension of new oil and gas leases.

7.2.7.2 Sweetwater County believes that federal lands should be available for oil and gas leasing and development with least restrictive stipulations needed to mitigate impacts to other public land resources and uses.

7.2.7.3 The County opposes unnecessary federal rules and standards associated with hydraulic fracturing and supports the revocation of all remaining direction for master leasing plans, which imposed an unnecessary planning step.

7.2.7.5 Sweetwater County opposes the cancellation or withdrawal of existing lease rights, and supports upholding existing lease rights, and the intent of the original lease terms without modification or cancellation.

Review findings: The forest plan is not making any decisions about lands to be made available for future mineral leasing or about lease stipulations that would apply to new mineral leases. Such decisions would be made through a separate leasing analysis process. The Forest does not anticipate any new mineral leasing until a new formal leasing analysis has been completed. The

forest plan includes appropriate provisions for protection of sensitive resources (including streams, wetlands, and riparian areas), consistent with valid existing rights for mineral and energy resources and in accordance with existing laws and regulation.

When the Flaming Gorge National Recreation Area was created, it was deliberately not closed to or withdrawn from future mineral leasing; however, various restrictions were imposed on future mineral leasing to ensure that any future leases or lease developments would be consistent with the purposes for which the recreation area was created. Any mineral leasing in the Flaming Gorge area would first require a formal leasing analysis to determine appropriate areas and stipulations for such leasing.

Part of the Forest Service's mission is to encourage, facilitate, and administer the orderly exploration, development, and production of mineral and energy resources on National Forest System lands to help meet the present and future needs of the Nation. Existing Federal and local laws, regulations, and legal decisions guide much of how or if particular minerals and energy management actions should take place. The energy and minerals plan components in the forest plan do not need to reiterate overarching Federal and local laws, regulations, and policies, which must be implemented.

The forest plan is not compatible with some of the objectives in the 7.2.7. Oil and Gas Sector of the Sweetwater FLRP. However, one of the goals in the forest plan (FW-GO-MINL-01) states: "The Ashley National Forest will be responsive to requests for exploration and development of energy and mineral resources. It encourages responsible mineral and energy exploration, development, and reclamation, in accordance with applicable mining and leasing laws and regulations."

Wildfire Management

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

8.2.4 The County supports increased grazing (allotments, Animal Unit Months, or seasonal use) to reduce fine fuel loads.

Reviewing findings: Livestock grazing plan direction is not considered one of the tools for fuels management.

Fisheries

Generally consistent with the forest plan.

Flood Plains and River Terraces

Generally consistent with the forest plan.

Forest Management

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

11.2.12 Because the Forest Service believes that the 2001 Inventoried Roadless Conservation Area rule prohibits vegetation and cutting timber in the areas, Sweetwater County calls for the revision of the

Inventoried Roadless Areas in the Ashley National Forest and the Flaming Gorge National Recreation Area.

Review findings: The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas.

The condition stated as the basis for this objective is not accurate. The 2001 Roadless Rule provides exceptions to the general tree cutting prohibition mandated by the Roadless Rule, and the Ashley National Forest has used one or more of these exceptions to cut trees in inventoried roadless areas on several occasions.

From the Code of Federal Regulations 36 CFR Part 294: § 294.14 Scope and applicability. (e) The prohibitions and restrictions established in this subpart are not subject to reconsideration, revision, or re-scission in subsequent project decisions or land and resource management plan amendments or revisions undertaken pursuant to 36 CFR part 219. Revision of the inventoried roadless areas within the Ashley National Forest or Flaming Gorge National Recreation Area is not within the authority of the Forest. Such a revision to the inventoried roadless areas is not permitted during the forest plan revision process.

Inventoried roadless areas are defined as areas identified in a set of inventoried roadless area maps contained in the Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2, dated November 2000, which are held at the National headquarters office of the Forest Service, or any subsequent update or revision of those maps. A response to a comment on page 3050 in the Federal Register published on January 12, 2001, states, “In the event a modification to correct any clerical, typographical, or other technical error is needed, the change will be made to the national headquarters maps and corrected copies of the maps made available to other administrative units.” This language indicates that only very limited modifications to the inventoried roadless areas are possible, and only for the specific reasons listed.

Irrigation

No applicable plan components in the forest plan.

Land Access

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

13.2.11 Sweetwater County supports revision of the Inventoried Roadless Areas or other “roadless areas” within or partially with in the county and their future management classifications.

13.2.12 Sweetwater County supports efforts by the State of Wyoming to petition the U.S. Department of Agriculture and Congress to correct the Inventoried Roadless Areas in the State.

Review findings: The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. Management decision in the forest plan recognize existing inventoried roadless areas; however, the Forest Service is not making any determinations for roadless areas and the plan does not include recommendations.

13.2.4 Sweetwater County will continue to assert and pursue the RS 2477 rights regarding the roads in Sweetwater County and federal agencies must recognize these access rights. (See Glossary RS 2477)

> Review findings: The forest plan provides strategic guidance, and no decisions will be made regarding the regulation of public activities and access to Federal lands, or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The system includes only those roads that are needed to serve administrative, multiple use, and public needs. The Forest Service staff will review access on a case-by-case basis.

Law Enforcement

No applicable plan components in the forest plan.

Domestic Livestock and Grazing and Agriculture

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

15.3.6 The County opposes the retirement of any grazing units through purchase or conversion of permits or extended conservation nonuse that keeps an allotment out of livestock grazing in violation of federal law that limits a permit to domestic livestock grazing.

> Review findings: The Forest Service does not recognize a financial value of a Term Grazing Permit (36 CFR 222.3(b). Forest Service term grazing permits are not sold or purchased; rather, livestock and/or base property are sold and purchased and the purchaser then applies for a term grazing permit. Forest Service policy allows for non-use of a grazing allotment for up to three years for permittee convenience, or for resource protection that can last as long as the term on the permit (36 CFR 222.3(c)(1)(vi)(D) & (2)(i)(C)).

15.3.7 Federal land agencies should properly coordinate, consult, and cooperate with permit-holders and the County in making changes to grazing management in permits or grazing plans.

> Review findings: Forest Service term grazing permits are between the permittee and the Forest Service, not the County.

15.3.16 The County believes that land management plans, programs, and 36 initiatives should provide the amount of domestic livestock forage, expressed in AUMs, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of AUMs sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.

> Review findings: The USFS does not bill permittees based on forage use or AUMs, but rather on occupancy of a designated grazing allotment 36 CFR 222.5(c.) This is based on head months. The number of head months appropriate to maintain sustainable range conditions has been determined over a century of livestock grazing and is modified through adaptive management and long-term trend studies on the Ashley National Forest.

15.3.17 The County recognizes grazing permits on federal lands are assets, which may be transferred by the permit owner. Such transactions must be processed by the land management agency promptly after proper notification. Any reduction in the size of the permit or forage allocation as a result of the transaction shall not be made without a specific scientific justification, consultation with the County, and monitoring data.

Review findings: The Forest Service does not recognize a financial value of a term grazing permit (36 CFR 222.3(b)).

Mining and Mineral Resources

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

16.2.4 The County believes that all public land should be open to leasing and other access with reasonable stipulations and conditions, including mitigation, reclamation, and bonding measures where necessary, that will protect the lands against unnecessary and undue degradation.

16.2.6 The County believes that federal agencies should review and revoke lease restrictions for public land leases that are no longer necessary or effective.

16.2.8 Sweetwater County objects to indefinite withdrawals of land from mineral exploration and development and, if withdrawals are determined to be necessary, then the withdrawal should be limited to the smallest area and shortest duration. BLM's use of indefinite withdrawals which predated enactment of the Federal Land Policy and Management Act (FLPMA), must be reviewed for need and renewed under FLPMA withdrawal procedures.

Review findings: This forest plan does not evaluate or make determinations about the suitability or availability of lands for future mineral or oil and gas leasing. Such determinations, as well as needed or appropriate lease stipulations to be applied to future oil and gas leases, would be done as a separate leasing analysis.

Non-Native Invasive Plants and Noxious Weeds

Generally consistent with the forest plan.

Predator Control

No applicable plan components in the forest plan.

Recreation and Tourism

Generally consistent with the forest plan.

Riparian and Wetland Areas

Generally consistent with the forest plan.

Special Designations

Wilderness

21.2.2.1 Sweetwater County opposes the White House and Interior Department 30 x 30 Initiative to ensure each state meets a 30% conservation objective. Wyoming already exceeds that commitment with existing wilderness areas, and national parks. Appendix **. Resolution of Sweetwater County on 30 x 30 Initiative (2021). Sweetwater County also meets this objective through the Flaming Gorge National Recreation Area, the 13 Wilderness Study Areas, and Seedskadee National Wildlife Refuge. Other withdrawals and public land orders already limit mineral development.

Review findings: Executive Order 140008, Tackling the Climate Crisis at Home and Abroad, includes the goal of "conserving at least 30 percent of our lands and waters by 2030." The Forest

Service does not have specific guidance related to achieving this general goal. The executive order also states: "The Federal Government must protect America's natural treasures, increase reforestation, improve access to recreation, and increase resilience to wildfires and storms, while creating well-paying union jobs for more Americans, including more opportunities for women and people of color in occupations where they are underrepresented." The forest plan's focus is on sustainability. The 2012 Planning Rule, which the plan is being revised under, requires the inclusion of plan components, including standards or guidelines, that address social and economic sustainability, ecosystem services, and multiple uses integrated with the plan components for ecological sustainability and species diversity. The responsible official recognizes the importance of recreation on the Forest, as well as the need to improve access to recreation, while balancing the other goals, including the major purpose of the executive order about intact ecosystems related to climate change.

21.2.2.2 The County does not support designation of additional areas within the County as federally designated wilderness. At least seven of the 13 wilderness study areas in the County were not recommended for wilderness and the roads in several areas should have disqualified the areas from the inventory and study.

21.2.2.4 The County supports removal of management provisions from federal lands that promote their management for wilderness characteristics and roadless qualities over other uses consistent with the multiple-use and sustained-yield management standard.

Review findings: As part of its forest plan revision process, the Forest Service is required to identify and evaluate lands that may be suitable for inclusion in the national wilderness preservation system and to determine whether to recommend any such lands for wilderness designation. While the supervisor of a national forest may preliminarily recommend suitable lands for National Wilderness Preservation System designation, only the U.S. Congress has the authority to act on wilderness designations. The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. The areas preliminarily recommended as eligible or suitable for national wilderness preservation include inventoried roadless areas.

Wild and Scenic Rivers

21.3.2.2 Sweetwater County objects to designating rivers as wild or scenic unless the State Engineer certifies there are no existing water rights are held on the stream segment and no upstream water rights holder will be limited in its use of water and no owner of water rights comes forward to object.

21.3.2.3 The County opposes designation if it would adversely affect the economic interests of the County, including enjoyment of private property rights, mineral extraction, timber harvest, agriculture, water rights, water storage, or water delivery.

Review findings: The Wild and Scenic Rivers Act of October 2, 1968, as amended (16 U.S.C. secs.1271-1287) (this act describes the National Wild and Scenic Rivers System), sets out the process for evaluating specific rivers Congress identifies as potential additions to the system as legislatively mandated study rivers (sec. 5(a) of the Act), and directs Federal agencies to identify and evaluate additional potential rivers for inclusion in the system during Agency planning (sec. 5(d)(1) of the act).

The planning rule at 36 CFR 219.10 provides for interim management of Forest Service eligible or suitable rivers or segments, to protect their values prior to a congressional decision whether to designate them as part of the National Wild and Scenic River System. This includes required plan components, including standards and guidelines, to provide for "protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system."

Areas of Critical Environmental Concern

No applicable plan components in the forest plan.

Other Special Management Areas

No applicable plan components in the forest plan.

Threatened, Endangered, and Sensitive Species

22.2.11 Sweetwater County opposes designation of critical habitats for threatened and endangered species, unless habitat is actually occupied and proven to be necessary.

Review findings: The Ashley National Forest contains lynx habitat that is unoccupied. It is considered a peripheral area for lynx that is incapable of supporting self-sustaining populations of lynx or of being used by a breeding female lynx. However, this habitat could be occasionally used by lynx during dispersal.

Water Quality and Hydrology

Generally consistent with the forest plan.

Water Rights

Generally consistent with the forest plan.

Wild Horses

No applicable plan components in the forest plan.

Wildlife

Generally consistent with the forest plan.

Daggett Conservation District

Daggett County Resource Assessment (2012)

Water Quality and Quantity

Generally consistent with the forest plan.

Pasture/Rangeland Health

Generally consistent with the forest plan.

Noxious Weeds

Generally consistent with the forest plan.

Wildlife Management

Generally consistent with the forest plan.

Forest Health

Generally consistent with the forest plan.

Uintah Conservation District

Uintah County Resource Assessment (2012)

Water Quality and Quantity

Generally consistent with the forest plan; there are some actions concerning water storage that are not applicable to the forest plan.

Energy, Surface, and Mineral Rights

Generally consistent with the forest plan.

Weeds and Riparian Health

Generally consistent with the forest plan.

Pasture and Rangelands

Generally consistent with the forest plan. Uintah County Resource Assessment plans contained actions related to wildlife management and preventing endangered species listing, which are outside of the Forest Service's purview.

Air Quality

Generally consistent with the forest plan.

Sage Grouse

No applicable plan components in the forest plan.

Long Range Plan Uinta County Conservation District 2017–2021 (2016)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:65ad3e22-c166-4e35-8022-900c125bcda0

Public Education

No applicable plan components in the forest plan.

Natural Resources

Generally consistent with the forest plan.

District Operations

No applicable plan components in the forest plan.

Sweetwater Conservation District

Lands and Resource Use Plan and Policy 2020–2025

Final Version Release (2020)

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:0736c99a-96f2-4ae1-85d2-ca2d1cfd9958

Primary Coordination Guidelines

Generally consistent with the forest plan.

Custom, Culture & Community Stability

Generally consistent with the forest plan.

Consultation, Cooperation, Coordination and Consistency with Local Land Use Plans

Generally consistent with the forest plan.

Constitutional Principles: Due Process and Protection of Private Property

No applicable plan components in the forest plan.

Land Tenure, Disposition, Acquisition, and Use

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

GOAL: Any land tenure adjustments by a federal or state government agency should be conditioned on no net loss of private land or private property rights and should fully compensate the landowner for the value of the property interest, including investment-backed expectations, and compensate Sweetwater County for the lost property tax revenue.

> Review findings: National Forest System lands are generally retained in Federal ownership to provide long-term values. The vision for the Ashley National Forest is to retain in public ownership all lands currently under its administration that meet the long-term needs of maintaining the integrity of contiguous natural ecosystems, riparian areas and wetland ecosystems, recreation and open space, scenery, clean air and water, and habitat for plant and animal populations. There are no direct plans to reduce private land ownership; however, the plan includes a vision to use the methods available to the Forest Service to acquire land rights that enhance the vision. Land exchange or acquisition will be decided on a site-specific basis.

Economic Profile and Development

Generally consistent with the forest plan.

Access And Transportation

Generally consistent with the forest plan.

Energy / Mineral Resources

Generally consistent with the forest plan.

Alternative / Renewable Energy

No applicable plan components in the forest plan.

Climate Change

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

1. GOAL: Ensure that the underlying theories of climate change continue to be carefully scrutinized and require better scientific documentation.

Objective 1A: Ensure that any project discussion of climate change reflects scientifically sound and balanced viewpoint of the scientific controversy.

Objective 1C: Oppose permanent investments based on the assumptions of climate change until the international scientific controversies are addressed with credible and quality data.

> Review findings: The forest plan includes direction for adapting to climate change. Specifically, FW-GO-CLIM-01 states: "Climate adaptation strategies, approaches, and tactics are considered and incorporated in the development and design of projects and activities for resource management on the Ashley National Forest. Just as climate adaptation work continues to evolve, the Ashley National Forest continues to collaboratively partner, learn, and incorporate effective science-based solutions." This plan direction could be interpreted as inconsistent with the Sweetwater County Conservation District Land and Resource Use Plan.

Water Rights

No applicable plan components in the forest plan.

Water Quality

Generally consistent with the forest plan.

Water / Watersheds

Generally consistent with the forest plan.

Irrigation / Agriculture

No applicable plan components in the forest plan.

Ditches / Canals

No applicable plan components in the forest plan.

Floodplains / River Terraces & Wetlands

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

1. GOAL: Limit federal jurisdiction over non-navigable waters within the State of Wyoming.

Objective 1A: Work with Wyoming DEQ [Department of Environmental Quality] and the State Engineer to recognize the ephemeral streams and other waters that are not navigable and are not connected to navigable waters flowing between states.

3. GOAL: Respect the role of local wetlands in the landscape which is different from and independent of national wetlands and related regulation.

4. GOAL: Oppose expansion of wetlands regulations and the government's jurisdiction over water sources, such as ephemeral waters, ditches, standing water, and groundwater.

> Review findings: The Forest Service, as an agency of the Federal government, is required to comply with all Federal, State, and local requirements for water pollution control in the same manner as any nongovernment entity. The forest plan does not limit federal jurisdiction over non-navigable waters, and it does not expand wetland regulations. However, the forest plan does include direction to protect and maintain wetlands, which may limit certain activities. See below for details:
>
> - FW-OB-WATER-03: "Improve or protect habitat conditions for at least five groundwater-dependent ecosystem features (springs, seeps, and other wetlands), every 5 years."
> - FW-GD-ROAD-02: "wetlands and unstable areas should be avoided when reconstructing roads or constructing new roads and landings. Impacts should be mitigated where necessary when avoidance is not practical."
> - FW-GD-TRAIL-02: "Wetlands and unstable areas should be avoided when reconstructing trails or constructing new trails. Impacts should be mitigated where necessary when avoidance is not practical."
> - Management approach: "Rehabilitate, stabilize, or remove structures in stream channels if they are not necessary or functional. Maintain and restore the hydrologic connectivity of streams, floodplains, meadows, wetlands, and other aquatic features. Identify roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary. Seek opportunities for restoring down-cut/aggraded channels, floodplain function, and water table availability to riparian and wetland vegetation."

Riparian Areas

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Objective 1B: Encourage defining riparian areas as areas of land directly or indirectly influenced by permanent water. Riparian areas have visible vegetation or physical characteristics reflective of permanent water influence. Excluded are such sites as ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil.

> Review findings: Riparian management zones in the forest plan include ephemeral stream channels and waterbodies and unstable or potentially unstable areas; however, the default riparian management zone distance from feature is less than that of perennial streams and intermittent seasonally flowing channels. The Forest Service, as an agency of the Federal government, is required to comply with all Federal, State, and local requirements for water pollution control in the same manner as any nongovernment entity.

Rangelands, Woodlands And Forests

Generally consistent with the forest plan.

Rangelands

Generally consistent with the forest plan.

Forests & Woodlands

Generally consistent with the forest plan.

Flora And Management of Vegetation

Generally consistent with the forest plan.

Controlling Weeds & Pests

Generally consistent with the forest plan.

Livestock Grazing

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Policy 7: Work to increase productivity of rangeland to increase and/or maintain Animal Unit Month ("AUMs") to maximum sustainable levels on rangeland in Sweetwater County.

- Any reductions in domestic livestock animal unit months must be temporary and scientifically based upon rangeland conditions.

  Review findings: The forest plan does not include direct reductions in AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

Fire Management

Generally consistent with the forest plan.

Wildlife

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Objective 5A: Oppose the conversion of livestock AUMs to wildlife AUMs. Forage allocations should be based on recognized grazing preference rights and the results of scientific forage studies identifying available forage for wildlife and livestock.

> Review findings: The forest plan does do not include any conversion of AUMs. Allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas. These factors could result in decreased AUMs but the Forest Service will decide AUMs based on site-specific conditions, not through the forest plan process.

Fisheries

Generally consistent with the forest plan.

Recreation

Generally consistent with the forest plan.

Predator And Pest Control

No applicable plan components in the forest plan.

Wild Horses

No applicable plan components in the forest plan.

Air Resources

Generally consistent with the forest plan.

Visual Resources

No applicable plan components in the forest plan.

Waste Management

No applicable plan components in the forest plan.

Special Land Designations

Wilderness

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

3. GOAL: Protect Wyoming's water resources and water adjudication system from any claim of a federal reserved right arising out of a special use designation, including wilderness.

Objective 3A: Ensure that a wilderness designation does not affect state authority over water resources and that Wyoming's substantive and procedural laws controlling appropriation and allocation of water resources remain the primary authorities governing the waters in Sweetwater County regardless of wilderness designation. Enforce determination that wilderness designation does not create a reserved water right.

Objective 3B: Protect any interests in ditches, reservoirs or water conveyance facilities and easements or rights-of-way associated with those interests from impairment or diminution by any wilderness or other special use designations.

> Review findings: Wilderness is congressionally designated; the Forest Service does not have the authority to “classify” lands as wilderness. There are no “temporary classifications” established when a recommendation is made for a wilderness. Instead, the term “recommended designation” should be used. The final version of the forest plan does not include recommended wilderness. The forest plan does not authorize or eliminate easements or rights-of-way.

Wild And Scenic Rivers

Generally consistent with the forest plan.

Areas Of Critical Environmental Concern

No applicable plan components in the forest plan.

Threatened And Endangered / Sensitive Species

Generally consistent with the forest plan; the plan objectives below are beyond the scope of this planning effort:

Objective 2A: Oppose the introduction or transplant of threatened and endangered species within the boundaries of the County, unless the District and the County consent and it is done pursuant to specific terms and conditions that avoid disrupting existing land uses.

> Review findings: Wildlife introduction is outside of the Forest Service's purview and would be determined and put into effect by the Utah Division of Wildlife Resources.

Greater Sage-Grouse

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Objective 1A: Oppose federal government sage-grouse conservation plans and RMP [Resource Management Plan] Amendments that are inconsistent with the Wyoming Executive Order 2015-04 and its revisions. Object to the federal government applying sage-grouse habitat protections to more federal land, restrictions on livestock grazing, failure to manage other impacts, increased restrictions for surface-disturbing activities, and limitations or closures on existing access routes.

> Review findings: Plan components for the conservation of greater sage-grouse were added to the current forest plan through a plan amendment in 2015 (Greater Sage-Grouse Record of Decision; see USDA Forest Service 2015). The forest plan has incorporated appropriate conservation measures for greater sage-grouse conservation in guideline FW-GDL-WILDL-11 and in other plan components. See Appendix D for a list of plan components that contribute to the persistence of sage-grouse.

Cultural, Archeological, Geological And Paleontological Resources

Generally consistent with the forest plan; the plan objectives below may be inconsistent with the forest plan:

Policy 2: Recommend local, state and federal agencies not jeopardize existing land uses, such as oil and gas exploration, mining, road maintenance, grazing and recreation through the protection of cultural and archeological sites. Compliance can be accomplished with mitigation measures that affect a balance of existing uses and the need to protect cultural sites.

> Review findings: The forest plan does not include direct restrictions on existing land uses through the management of cultural and historic resources. However, the plan states that the adverse effects on cultural resources eligible to the National Register of Historic Places shall be avoided, minimized, or mitigated for all projects, activities, permits, or actions on National Forest System lands in accordance with section 106 of the National Historic Preservation Act, as specified in 36 CFR 800. This is done in consultation with the appropriate State Historic Preservation Officers, Tribal Historic Preservation Officer, Native American Tribes, local governments, and other consulting parties. Any restrictions will be determined on a site-specific basis.

Communication / Technology

No applicable plan components in the forest plan.

The Continuing Process

No applicable plan components in the forest plan.

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Appendix F

Wild and Scenic Rivers Suitability Report

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Acronym or Abbreviation	Full Term
CARA	Comment Analysis and Response application (Forest Service)
EIS	environmental impact statement
Forest Service	United States Forest Service
FSH	Forest Service Handbook
NEPA	National Environmental Policy Act
NHD	National Hydrography Dataset
NRHP	National Register of Historic Places
NWSRS	National Wild and Scenic Rivers System
ORV	outstandingly remarkable value
US	United States
USGS	United States Geological Survey
WSR	Wild and Scenic River
WSR Act	Wild and Scenic Rivers Act of 1968

Appendix F. Wild and Scenic Rivers Suitability Report

Introduction

Section 5(d)(1) of the Wild and Scenic Rivers Act of 1968 (WSR Act) (Public Law 90-542; 16 US Code 1271-1287) directs federal agencies to consider potential Wild and Scenic Rivers (WSRs) in their land and water planning processes: "In all planning for the use and development of water and related land resources, consideration shall be given by all federal agencies involved to potential national wild, scenic, and recreational river areas." To fulfill this requirement, the United States (US) Department of Agriculture, US Forest Service's 2012 planning rule requires the agency to identify rivers that may be appropriate for inclusion in the National Wild and Scenic Rivers System (NWSRS). This is required whenever the Forest Service undertakes a land management plan action, such as revising a land and resource management plan (or forest plan).

In order to ensure consistency in WSR suitability determinations across the National Forests and Grasslands within the Forest Service's Intermountain Region (Region 4), the region developed, with public input, a regional suitability study process that describes the methodology and parameters by which eligible river segments would be evaluated for suitability. The regional process was modified to the minimum extent necessary to meet the unique needs of this forest. The forest-specific suitability study process was then applied to the list of eligible rivers occurring on the forest.

This report captures the results of the suitability phase of the WSR evaluation process and makes determinations on the suitability of the eligible rivers studied. In total, 4 eligible rivers were studied for their suitability as part of this process and 4 were determined to be suitable.

Study Area and Rivers Studied

The Ashley National Forest's administrative boundary constitutes the study area for this WSR eligibility report. The Forest is located in northeastern Utah and southwestern Wyoming and encompasses 1,400,400 National Forest acres (1,295,700 acres in Utah and 104,700 acres in Wyoming) in seven counties: Daggett, Duchesne, Summit, Uintah, Utah, and Wasatch Counties in Utah and Sweetwater County in Wyoming. Within the administrative boundary of the Ashley National Forest, there are approximately 22,800 acres of non-National Forest System lands (Forest Service 2019).

The Ashley National Forest is located in three major areas: the northern and southern slopes of the Uinta Mountains, the Wyoming Basin, and the Tavaputs Plateau with about 70 percent of the Forest falling within the Uinta Mountains. The Uinta Mountains are the largest east-west trending mountain range in the lower 48 states. Together with the Tavaputs Plateau, the Uinta Mountains provide a unique ecological transition zone connecting the northern and southern Rocky Mountains. Within these diverse areas, the Forest landscape ranges from high desert country to high mountain areas with elevations ranging from a low of 5,500 feet on the Green River below Little Hole to a high of 13,528 feet above sea level at the summit of Kings Peak (the highest point in Utah). Geology and geomorphology are also diverse, including broad glacial plains above treeline, river canyons at lower elevations, and highly dissected plateau lands (Forest Service 2019).

A WSR study process is composed of three main phases: eligibility, classification, and suitability. The eligibility and preliminary classification phases (Forest Service 2019) were conducted in accordance with Forest Service Handbook (FSH) 1909.12 – Land Management Planning Handbook, Chapter 80 – Wild

and Scenic Rivers (Forest Service 2015) and with The Wild and Scenic River Study Process technical report (Interagency Wild and Scenic Rivers Coordinating Council 1999).

Under the eligibility phase, to be considered as outstandingly remarkable under the WSR Act, a river-related value must be a unique, rare, or exemplary feature that is significant at a comparative regional or national scale (region of comparison). Outstandingly remarkable values are scenic, recreational, geological, fish related, wildlife related, historic, cultural, botanical, hydrological, paleontological, scientific, or other values. The determination of ORVs for river segments in the planning area is documented in Ashley National Forest, Draft Wild and Scenic River Eligibility Report (Forest Service 2019).

If the eligibility phase determines segments to be eligible, the Forest Service shall also assign a preliminary classification and identify management measures needed to ensure appropriate protection of the values supporting the eligibility and classification. The preliminary classification of an eligible river is based on its condition and that of the adjacent lands at the time of the study. The WSR Act specifies and defines three classification categories for eligible rivers: wild, scenic, and recreational. Classes are based on the type and degree of human development and access associated with the river and adjacent lands at the time of the eligibility determination. The assignment of preliminary classification and interim protection measures are documented in Ashley National Forest, Draft Wild and Scenic River Eligibility Report (Forest Service 2019).

There were 40 rivers studied for eligibility, with a cumulative length of 82.0 miles on the Forest. It was determined that 4 rivers eligible for inclusion in the NWSRS, for a total of 14.0 miles on the Forest (Forest Service 2019).

What is a Wild and Scenic River?

Congress enacted the WSR Act on October 2, 1968, to address the need for a national system for river protection. As an outgrowth of a national conservation agenda in the 1950s and 1960s, the WSR Act was enacted in response to the dams, diversions, and water resource development projects that were constructed on America's rivers between the 1930s and 1960s. The WSR Act stipulated that selected rivers should be preserved in a free-flowing condition and be protected for the benefit and enjoyment of present and future generations. Since 1968, the WSR Act has been amended many times, primarily to designate additional rivers and to authorize the study of other rivers for possible inclusion.

The WSR Act seeks to protect and enhance a river's natural and cultural values and to provide for public use consistent with its free-flowing character, its water quality, and its outstandingly remarkable values (ORVs). Designation affords certain legal protections from development. For instance, new dams cannot be constructed, and federally assisted water resource development projects that might negatively affect the designated river values are not permitted. Each river in the NWSRS is administered to protect and enhance the values that caused the river to be designated. Where private lands are involved, the federal managing agency works with local governments and owners to develop protective measures. Designation neither prohibits development on private lands nor gives the federal government control over those private lands.

As of March 2019 (the last designation), the NWSRS protects 13,412.5 miles of 226 rivers in 41 states and the Commonwealth of Puerto Rico; this is a little more than one-quarter of one percent of the nation's rivers (Interagency Wild and Scenic Rivers Coordinating Council 2020). These nationally recognized rivers make up a valuable network of natural and cultural resources, scenic beauty, and recreational opportunities.

Steps in the Wild and Scenic River Study Process

A WSR study process is composed of three main phases: eligibility, classification, and suitability. The phases of the study occur in accordance with Forest Service Handbook (FSH) 1909.12 – Land Management Planning Handbook, Chapter 80 – Wild and Scenic Rivers (Forest Service 2015) and with The Wild and Scenic River Study Process technical report (Interagency Wild and Scenic Rivers Coordinating Council 1999). Excerpts from FSH 1909.12, Chapter 80 are presented below to explain the process.

Past Studies

In 2008, the Intermountain Region completed its final EIS and signed the Record of Decision for its Wild and Scenic River Suitability Study for National Forest System Lands in Utah (Forest Service 2008). The study evaluated the suitability of 86 eligible rivers (840 miles) on the national forests in Utah for recommendation for inclusion in the National WSR System. Two rivers were recommended as suitable on the Ashley National Forest; an additional 22 rivers were found not suitable.

Eligibility Phase

The inventory of rivers to be studied must include all named rivers on a standard US Geological Survey (USGS) 7.5-minute quadrangle map. Each identified segment is evaluated for eligibility for inclusion in the NWSRS. Determinations of eligibility will be documented by a responsible official (usually a Forest Supervisor) prior to the formulation of alternatives but no later than the release of the draft land management plan. The WSR Act states that, in order to be found eligible, a river must be “free flowing” and contain at least one river-related value considered to be “outstandingly remarkable.”

The eligibility study was conducted for only the named rivers on a standard U.S. Geological Survey 7.5-minute quadrangle map that had not previously been studied for eligibility, as allowed by the FSH. Forty additional streams (82 miles) were studied for eligibility; four were found eligible with a cultural outstandingly remarkable value (ORV).

Preliminary Classification Phase

After a river is identified to be eligible for inclusion in the NWSRS, the forest assigned a preliminary classification and identified management measures needed to ensure appropriate protection of the values supporting the eligibility and classification. Interim protection measures are described in **Section 4.1**, Interim Management.

The preliminary classification of an eligible river is based on its condition and that of the adjacent lands at the time of the study. The WSR Act specifies and defines three classification categories for eligible rivers: wild, scenic, and recreational. Classes are based on the type and degree of human development and access associated with the river and adjacent lands at the time of the eligibility determination.

Classification does not reflect the types of values present along a river segment. Determining a preliminary classification establishes a guideline for management until either a suitability determination or a designation decision is reached. The classification assigned during the eligibility phase is tentative. Final classification is a congressional legislative determination that occurs with designation of a river segment as part of the NWSRS.

A summary of eligible river segments and preliminary classification is provided in table F-1.

Table F-1. Summary of Ashley National Forest Eligible Rivers and Preliminary Classification

River Name	Length on Forest (miles)	ORVs	Preliminary Classification
Dowd Creek	3.1	Cultural	Recreational
Honslinger Creek	2.3	Cultural	Recreational
North Skull Creek	1.8	Cultural	Wild
Spring Creek 2	6.8	Cultural	Recreational

Source: Forest Service 2019

Suitability Phase

The purpose of the suitability phase is to determine whether eligible river segments are suitable or not for inclusion in the NWSRS, in accordance with the WSR Act. Suitability considerations include the environmental and economic consequences of designation and the manageability of a river if Congress were to designate it. FSH 1909.12 83.2 identifies the various criteria that the Forest Service is to use for determining suitability. The suitability evaluation does not result in actual designation but only a determination of a river's suitability for inclusion in the NWSRS. This is done through evaluation under the National Environmental Policy Act (NEPA). The Forest Service cannot administratively designate a river via a planning decision or other agency decision into the NWSRS; only Congress can designate a river in the NWSRS. In some instances, the Secretary of Agriculture may designate a WSR when the governor of a state, under certain conditions, petitions for a river to be designated. Members of Congress will ultimately choose the legislative language if any suitable segments are presented to them.

River protection standards and guidelines that meet the purposes of the WSR Act will be the responsibility of the Forest administering the river. For any rivers designated by Congress, the Forest will take the following actions:

- Develop a comprehensive river management plan that must define the goals and desired conditions for protecting river values
- Address the capacity of use that the river area can sustain
- Address water quality and instream flow requirements

Rivers found not suitable would be dropped from further consideration and managed according to the objectives outlined in the land management plan. Suitability determinations made in a NEPA document are draft until the decision record for the NEPA document is signed. It is the intention of the Region that forests will make suitability determinations in their land and resource management plans and evaluated in the environmental impact statements (EISs) for those plans.

Suitability Study Process

This section briefly describes the process used to study eligible river segments for their suitability. The forest-specific suitability study process was developed from the regional suitability study process, modified only to the minimum extent necessary to meet the unique needs of the forest. Both of these processes conform to the guidelines provided in FSH 1909.12, Chapter 80 and the WSR Act. However, the regional and forest-specific suitability study processes provide additional methodology, parameters, and recommended data and information sources to ensure that suitability determinations are made consistently.

The suitability study process describes a seven-step approach. Within that process, there are three key analytical steps:

1. Evaluating and documenting the thirteen criteria for determining suitability presented in FSH 1909.12 83.21, which serves as the basis for each river's suitability determination.
2. Using the documentation of the thirteen criteria to answer the five suitability questions in FSH 1909.12 83.2, which speak to the core considerations in a suitability determination.
3. Reviewing the answers to the five questions in light of the purposes of the WSR Act to make a determination on an eligible river's suitability for inclusion in the NWSRS.

The suitability analysis and determination that resulted from the application of the study process are summarized and documented in this report in **Section 3**, Suitability Study Determinations.

Suitability Study Determinations

Summary of Suitability Study Determinations

Of the 4 eligible segments studied for suitability, 4 rivers (14 total miles, 4,700 acres[1]) were determined to be not suitable for inclusion in the NWSRS.

Table F-2 provides a summary of the suitability determinations resulting from the application of the suitability study process to the eligible rivers on the forest.

Table F-2. Summary of Preliminary Suitability Determinations

River	Length (miles)	Preliminary Suitability Determination	Recommended Classification
Dowd Creek	3.1	Not Suitable	N/A
Honslinger Creek	2.3	Not Suitable	N/A
North Skull Creek	1.8	Not Suitable	N/A
Spring Creek 2	6.8	Not Suitable	N/A

The determinations of not suitable are based on use of other federal laws that govern management of cultural resources, which are considered more appropriate for the protection of the identified ORV in the absence of other ORVs along the segment. Under the National Historic Preservation Act and in consultation with tribes, the Forest Service is adequately able to provide for protection of the resources. The sites are protected under regulations developed under the National Historic Preservation Act. These regulations give greater protection to the cultural sites than does the WSR designation. Also, the criteria for cultural ORVs state that cultural sites must be rare, have unusual characteristics, or exceptional human-interest value(s). The sites near these potential WSR segments are not exceptional or rare. They are historically significant but not more so than other cultural sites in the area.

[1] Acres (quarter mile buffer) of stream corridors for suitable WSR segments on the Ashley National Forest

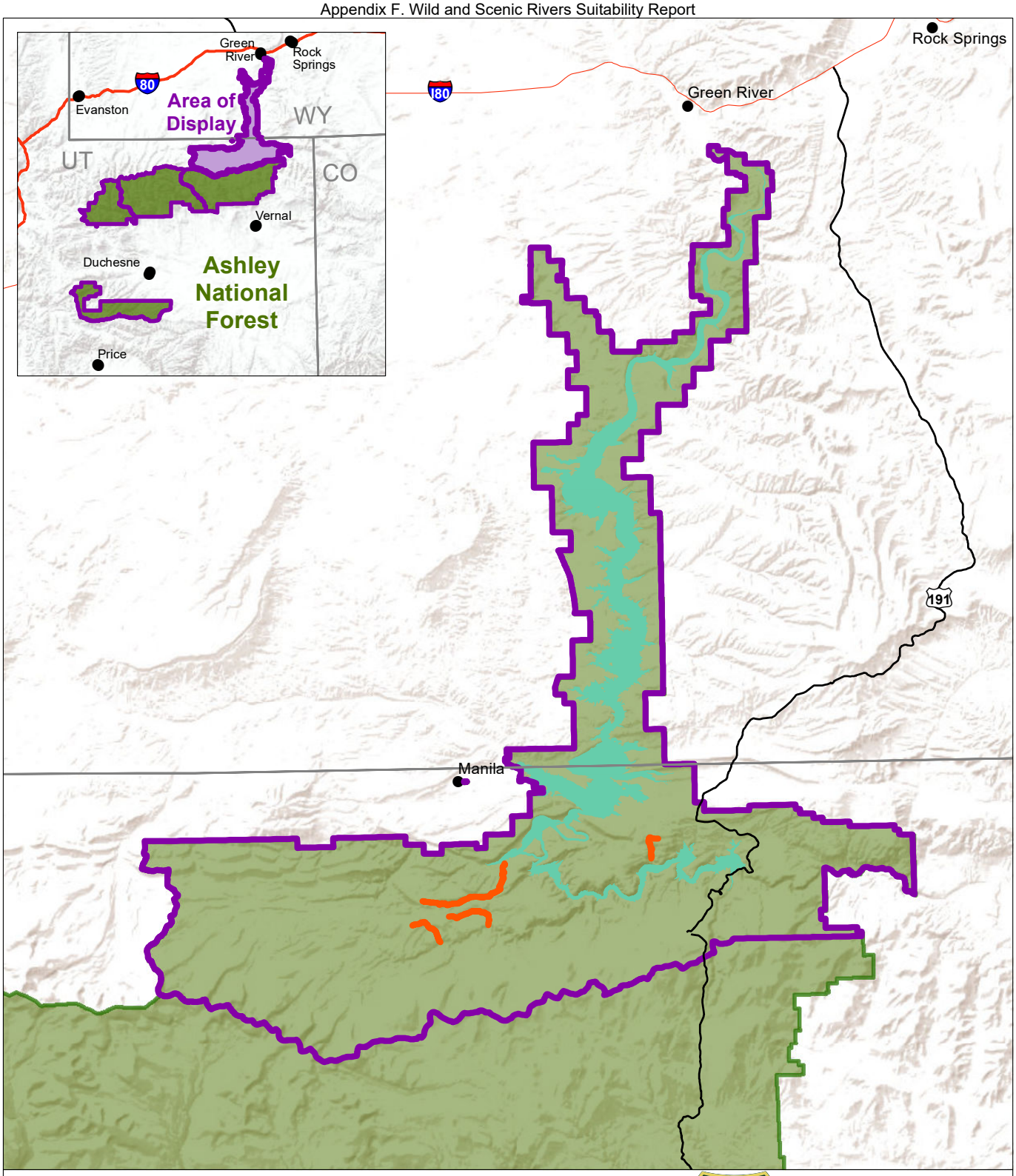

Figure F-1: All Study Segments

- Study segment
- Flaming Gorge Reservoir
- Flaming Gorge Ranger District

0 2.5 5
Miles

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March 10, 2023
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Dowd Creek

Legal Description:	From the headwaters south of Windy Ridge and south of Spring Creek in Section 25, T.2N., R.19E. to the confluence with Carter Creek northeast quarter of Section 32, T.2N., R.20E.		
Total Segment Length:	3.1 miles	**Total Segment Area:**	1,082 acres
Length on FS Land:	3.1 miles	**Area on FS Land:**	1,082 acres
Preliminary Classification:	Recreational		
ORVs:	Cultural		

Suitability Assessment

1. Characteristics that do or do not make the area (the corridor) a worthy addition to the National System.

This segment includes 23 previously identified cultural resources. Nineteen are prehistoric sites (10 are eligible to the National Register of Historic Places [NRHP] and 9 are not eligible), several of which are lithic scatters. Two other sites include both prehistoric and historic components and are eligible to the NRHP, and two sites are historic and considered not eligible to the NRHP. Twelve of the NRHP-eligible prehistoric sites are in close proximity to Dowd Creek, and two large prehistoric campsites surround Dowd Spring (the source of the creek), indicating long-term, repeat usage of the creek corridor during prehistory. The sites' clear relationship to Dowd Creek and the prehistoric occupation demonstrate cultural or historic values that are unique, rare, or exemplary within the region of comparison. The preliminary classification for this river is recreational. Multiple access points from roads exist.

2. The current status of land ownership and use in the area.

The segment area is entirely on National Forest System lands. Portions of the area are used for harvesting timber (384 acres in the segment area) and recreation associated with Dowd Mountain Trail (0.7 miles in the segment area out of a total of 3.3 miles) east of the river, Dowds Hole Overlook, and a roadless area (60 acres in the segment area) northeast of the river. The eastern three-quarters of the segment area is in the Flaming Gorge National Recreation Area. Highway 44 (Flaming Gorge-Uintas National Scenic Byway) with scenic views parallels approximately a quarter of the river in the eastern portion of the segment area.

3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.

Existing levels of timber harvest and recreation have not been documented to impact the cultural resources along the stretch of river. Therefore, it is not reasonably foreseeable that these uses would need to be curtailed if designated. Recreation and cultural resources activities, such as research and education, could be enhanced.

4. The Federal agency that will administer the area should it be added to the National System.

The Forest Service would administer the segment area.

5. The extent to which the agency proposes that administration of the river, including the costs thereof, be shared by State and local agencies.

The Forest Service would be responsible for all administration of the river.

6. The need for, and cost to the United States of, acquiring lands and interests in lands and administering the area should it be added to the National System.

The segment area is entirely on National Forest System lands. The Forest Service already administers all lands in the segment area.

7. A determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the National System.

The Forest Service would continue all preservation and administration of the river.

8. The adequacy of local zoning and other land use controls in protecting the river's outstandingly remarkable values by preventing incompatible development.

The Ashley National Forest Plan may address the cultural resources that comprise the ORV for Dowd Creek. Criteria for cultural ORVs includes the following:

The river or area within the river corridor contains a site(s) where there is evidence of occupation or use by Native Americans. Sites must be rare, have unusual characteristics, or exceptional human-interest value(s). Sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or cultural period was first identified an described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes.

The principal federal law addressing cultural resources is the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC Section 470), and its implementing regulations (36 Code of Federal Regulations [CFR] 800). These regulations, commonly referred to as the Section 106 process, describe the procedures for identifying and evaluating historic properties, for assessing the effects of federal actions on historic properties, and for project proponents consulting with appropriate agencies to avoid, reduce, or minimize adverse effects.

The primary objective of managing cultural resources is the protection of the resource from damage or destruction. To the extent consistent with protection, the Forest Service also manages cultural resources for scientific research, public education and enjoyment. Where interpretation of these sites for public benefit and knowledge is developed, it is required that this use be compatible with the protection of cultural resources.

9. The State or local government's ability to manage and protect the outstandingly remarkable values on non-Federal lands. This factor requires an evaluation of the river protection mechanisms available through the authority of State and local governments. Such mechanisms may include, for example, State-wide programs related to population growth management, vegetation management, water quantity or quality, or protection of river-related values such as open space and historic areas.

There are no non-federal lands.

10. The consistency of designation with other agency plans, programs, or policies, and with meeting regional objectives. Designation may help or impede the goals of Tribal governments, or other Federal, State, or local agencies. For example, designation of a river may contribute to State or regional protection objectives for fish and wildlife resources. Similarly, adding a river that includes a limited recreation activity or setting to the National System may help meet State-wide recreation goals for that activity or setting. Designation might, however, limit irrigation and/or flood control measures in a manner inconsistent with regional socioeconomic goals.

There are no other agency plans, programs, or policies to consider, because the segment area is entirely on National Forest System lands.

11. Support or opposition to designation. Assessment of this factor will define the political context. The interest in designation or nondesignation by other Federal agencies; State, local and Tribal governments; national and local publics; and the State's Congressional delegation should be considered.

The State of Utah opposes the use of interim protection measures for the river segment until specific designation by Congress or the Utah State Legislature.

The Southwest River Protection Program supports the ORV and preliminary classification. It also recommends the additional ORV of wildlife, stating that the Utah Division of Wildlife Resources notes that the Dowd Creek corridor contains seasonal or year-long habitat for dusky grouse, ruffed grouse, and snowshoe. The Southwest River Protection Program also recommends the additional preliminary classification of scenic. The middle portion of the stream is neither crossed nor directly paralleled by roads. The preliminary classification of scenic would enhance protection of the stream and its corridor.

The organizations American Whitewater and American Rivers have commented that the Forest Service should remove the suitability analysis from the plan entirely and not rely upon or reference past unsuitability findings.

12. The river's contribution to river system or basin integrity. This factor reflects the benefits of a "systems" approach. For example, expanding the designated portion of a river in the National System or developing a legislative proposal for an entire river system (headwaters to mouth) or watershed could contribute to river system integrity. Numerous benefits may result from managing an entire river or watershed, including the ability to design a holistic protection strategy in partnership with other agencies and the public.

Dowd Creek flows into Carter Creek, which was determined eligible in 2005 and later determined not suitable in 2009. Basin integrity is not a factor for consideration for the ORV on this stretch of river.

13. The potential for water resources development. The intent of the Act is to preserve selected rivers in free-flowing condition and to protect their immediate environments.

There is no known potential water resources development.

Suitability Determination

Based on the information contained in this study, the Forest Service finds Dowd Creek to be not suitable for inclusion in the NWSRS. This is because other federal laws governing management of cultural resources are more appropriate for the protection of the identified ORV in the absence of other ORVs along the segment. Under the NHPA and in consultation with tribes, the Forest Service is adequately able to provide for protection of the resources.

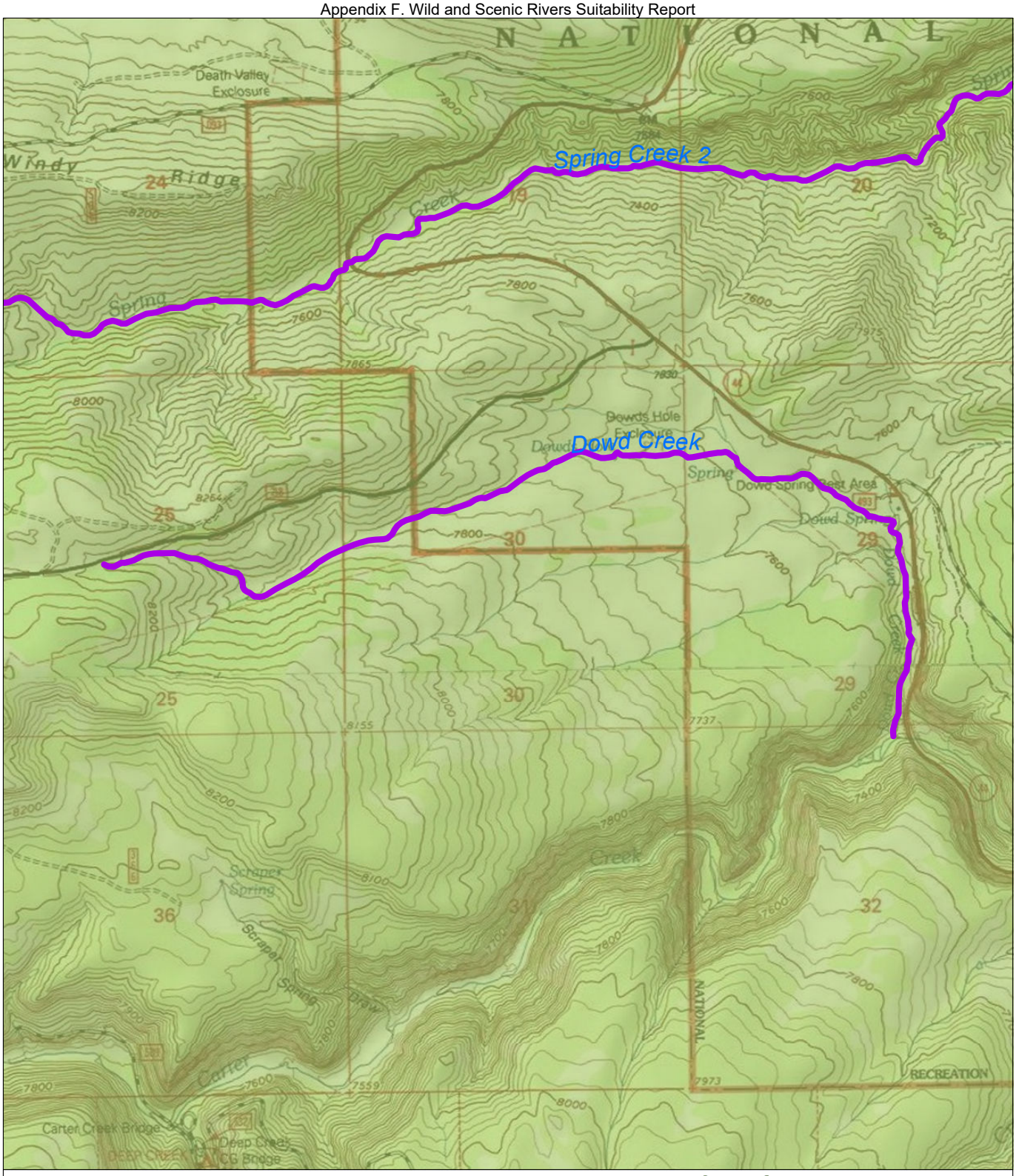

Figure F-2: Dowd Creek

Study segment

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0 870 1,740
Feet

Honslinger Creek

Legal Description:	From the headwaters east of Ute Mountain in the southwest quarter of Section 27, T.2N., R.19E. to the confluence with Carter Creek west of the Carter Creek Bridge in the southeast quarter of Section 35, T.2N., R.19E.		
Total Segment Length:	2.3 miles	**Total Segment Area:**	837 acres
Length on FS Land:	2.3 miles	**Area on FS Land:**	837 acres
Preliminary Classification:	Recreational		
ORVs:	Cultural		

Suitability Assessment

1. Characteristics that do or do not make the area (the corridor) a worthy addition to the National System.

This segment includes 18 previously identified cultural resources. Seventeen are prehistoric sites, including rock shelters and artifact scatters (12 are considered eligible to the NRHP and 5 are not eligible). One additional site was a historic road constructed by the Civilian Conservation Corps and considered not eligible to the NRHP. Because many of these resources are eligible to the NRHP and because their clear relationship to Leona Creek demonstrates use of the river corridor from prehistory to the early twentieth century, there are cultural or historic values that are unique, rare, or exemplary in the region of comparison. Multiple access points from roads exist.

2. The current status of land ownership and use in the area.

The segment area is entirely on National Forest System lands. Portions of the area are used for harvesting timber (236 acres in the segment area). Forest Service roads crisscross the area and river. There is also a roadless area (93 acres in the segment area).

3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.

Existing levels of timber harvest and recreation have not been documented to impact the cultural resources along the stretch of river. Therefore, it is not reasonably foreseeable that these uses would need to be curtailed if designated. Cultural resources activities, such as research and education, could be enhanced.

4. The Federal agency that will administer the area should it be added to the National System.

The Forest Service would administer the segment area.

5. The extent to which the agency proposes that administration of the river, including the costs thereof, be shared by State and local agencies.

The Forest Service would be responsible for all administration of the river.

6. The need for, and cost to the United States of, acquiring lands and interests in lands and administering the area should it be added to the National System.

The segment area is entirely on National Forest System lands. The Forest Service already administers all lands in the segment area.

7. A determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the National System.

The Forest Service would continue all preservation and administration of the river.

8. The adequacy of local zoning and other land use controls in protecting the river's outstandingly remarkable values by preventing incompatible development.

The Ashley National Forest Plan may address the cultural resources that comprise the ORV for Honslinger Creek. Criteria for cultural ORVs includes the following:

The river or area within the river corridor contains a site(s) where there is evidence of occupation or use by Native Americans. Sites must be rare, have unusual characteristics, or exceptional human-interest value(s). Sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or cultural period was first identified an described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes.

The principal federal law addressing cultural resources is the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC Section 470), and its implementing regulations (36 Code of Federal Regulations [CFR] 800). These regulations, commonly referred to as the Section 106 process, describe the procedures for identifying and evaluating historic properties, for assessing the effects of federal actions on historic properties, and for project proponents consulting with appropriate agencies to avoid, reduce, or minimize adverse effects.

The primary objective of managing cultural resources is the protection of the resource from damage or destruction. To the extent consistent with protection, the Forest Service also manages cultural resources for scientific research, public education and enjoyment. Where interpretation of these sites for public benefit and knowledge is developed, it is required that this use be compatible with the protection of cultural resources.

9. The State or local government's ability to manage and protect the outstandingly remarkable values on non-Federal lands. This factor requires an evaluation of the river protection mechanisms available through the authority of State and local governments. Such mechanisms may include, for example, State-wide programs related to population growth management, vegetation management, water quantity or quality, or protection of river-related values such as open space and historic areas.

There are no non-Federal lands.

10. The consistency of designation with other agency plans, programs, or policies, and with meeting regional objectives. Designation may help or impede the goals of Tribal governments, or other Federal, State, or local agencies. For example, designation of a river may contribute to State or regional protection objectives for fish and wildlife resources. Similarly, adding a river that includes a limited recreation activity or setting to the National System may help meet State-wide recreation goals for that activity or setting. Designation might, however, limit irrigation and/or flood control measures in a manner inconsistent with regional socioeconomic goals.

There are no other agency plans, programs, or policies to consider, because the segment area is entirely on National Forest System lands.

11. Support or opposition to designation. Assessment of this factor will define the political context. The interest in designation or nondesignation by other Federal agencies; State, local and Tribal governments; national and local publics; and the State's Congressional delegation should be considered.

The State of Utah opposes the use of interim protection measures for the river segment until specific designation by Congress or the Utah State Legislature.

The Southwest River Protection Program supports the ORV and preliminary classification. It also recommends the additional ORV of wildlife, stating that the Utah Division of Wildlife Resources notes that the Honslinger Creek corridor contains seasonal or year-long habitat for dusky grouse, ruffed grouse, and snowshoe hare.

The organizations American Whitewater and American Rivers have commented that the Forest Service should remove the suitability analysis from the plan entirely and not rely upon or reference past unsuitability findings.

12. The river's contribution to river system or basin integrity. This factor reflects the benefits of a "systems" approach. For example, expanding the designated portion of a river in the National System or developing a legislative proposal for an entire river system (headwaters to mouth) or watershed could contribute to river system integrity. Numerous benefits may result from managing an entire river or watershed, including the ability to design a holistic protection strategy in partnership with other agencies and the public.

Dowd Creek flows into Carter Creek, which was determined eligible in 2005 and later determined not suitable in 2009. Basin integrity is not a factor for consideration for the ORV on this stretch of river.

13. The potential for water resources development. The intent of the Act is to preserve selected rivers in free-flowing condition and to protect their immediate environments.

There is no known potential water resources development.

Suitability Determination

Based on the information contained in this study, the Forest Service finds Honslinger Creek to be not suitable for inclusion in the NWSRS. This is because other federal laws governing management of cultural resources are more appropriate for the protection of the identified ORV in the absence of other ORVs along the segment. Under the NHPA and in consultation with tribes, the Forest Service is adequately able to provide for protection of the resources.

Figure F-3: Honslinger Creek

Study segment

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0 530 1,060
Feet

North Skull Creek

Legal Description:	From the headwaters south of Antelope Flat and east of Bear Top Mountain in the east half of Section 2, T.2N., R.21E. to the junction with the Flaming Gorge Reservoir in Section 11, T.2N., R.21E.		
Total Segment Length:	1.8 miles	**Total Segment Area:**	675 acres
Length on FS Land:	1.8 miles	**Area on FS Land:**	675 acres
Preliminary Classification:	Wild		
ORVs:	Cultural		

Suitability Assessment

1. Characteristics that do or do not make the area (the corridor) a worthy addition to the National System.

This segment includes four previously identified cultural resources, all of which are NRHP-eligible prehistoric sites, including rare prehistoric storage features and a possible burial. The river-related cultural or historic values along this segment are unique, rare, or exemplary in the region of comparison based on these rare, NRHP-eligible resources related to North Skull Creek. There is no access from roads or trails, and it is within a roadless area.

2. The current status of land ownership and use in the area.

The segment area is entirely on National Forest System lands. There are 573 acres of roadless area in the segment area. The segment area is in the Flaming Gorge National Recreation Area.

3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.

Cultural resources activities, such as research and education, could be enhanced.

4. The Federal agency that will administer the area should it be added to the National System.

The Forest Service would administer the segment area.

5. The extent to which the agency proposes that administration of the river, including the costs thereof, be shared by State and local agencies.

The Forest Service would be responsible for all administration of the river.

6. The need for, and cost to the United States of, acquiring lands and interests in lands and administering the area should it be added to the National System.

The segment area is entirely on National Forest System lands. The Forest Service already administers all lands in the segment area.

7. A determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the National System.

The Forest Service would continue all preservation and administration of the river.

8. The adequacy of local zoning and other land use controls in protecting the river's outstandingly remarkable values by preventing incompatible development.

The Ashley National Forest Plan may address the cultural resources that comprise the ORV for North Skull Creek. Criteria for cultural ORVs includes the following:

The river or area within the river corridor contains a site(s) where there is evidence of occupation or use by Native Americans. Sites must be rare, have unusual characteristics, or exceptional human-interest value(s). Sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or cultural period was first identified an described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes.

The principal federal law addressing cultural resources is the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC Section 470), and its implementing regulations (36 Code of Federal Regulations [CFR] 800). These regulations, commonly referred to as the Section 106 process, describe the procedures for identifying and evaluating historic properties, for assessing the effects of federal actions on historic properties, and for project proponents consulting with appropriate agencies to avoid, reduce, or minimize adverse effects.

The primary objective of managing cultural resources is the protection of the resource from damage or destruction. To the extent consistent with protection, the Forest Service also manages cultural resources for scientific research, public education and enjoyment. Where interpretation of these sites for public benefit and knowledge is developed, it is required that this use be compatible with the protection of cultural resources.

9. The State or local government's ability to manage and protect the outstandingly remarkable values on non-Federal lands. This factor requires an evaluation of the river protection mechanisms available through the authority of State and local governments. Such mechanisms may include, for example, State-wide programs related to population growth management, vegetation management, water quantity or quality, or protection of river-related values such as open space and historic areas.

There are no non-Federal lands.

10. The consistency of designation with other agency plans, programs, or policies, and with meeting regional objectives. Designation may help or impede the goals of Tribal governments, or other Federal, State, or local agencies. For example, designation of a river may contribute to State or regional protection objectives for fish and wildlife resources. Similarly, adding a river that includes a limited recreation activity or setting to the National System may help meet State-wide recreation goals for that activity or setting. Designation might, however, limit irrigation and/or flood control measures in a manner inconsistent with regional socioeconomic goals.

There are no other agency plans, programs, or policies to consider, because the segment area is entirely on National Forest System lands.

11. Support or opposition to designation. Assessment of this factor will define the political context. The interest in designation or nondesignation by other Federal agencies; State, local and Tribal governments; national and local publics; and the State's Congressional delegation should be considered.

The State of Utah opposes the use of interim protection measures for the river segment until specific designation by Congress or the Utah State Legislature.

The Southwest River Protection Program supports the ORV and preliminary classification. It also recommends the additional ORV of wildlife, stating that the Utah Division of Wildlife Resources notes that the North Skull Creek corridor contains seasonal or year-long habitat for imperiled greater sage-grouse. Rocky Mountain bighorn sheep also use the area (Greenwood et. al. 1999).

The organizations American Whitewater and American Rivers have commented that the Forest Service should remove the suitability analysis from the plan entirely and not rely upon or reference past unsuitability findings.

12. The river's contribution to river system or basin integrity. This factor reflects the benefits of a "systems" approach. For example, expanding the designated portion of a river in the National System or developing a legislative proposal for an entire river system (headwaters to mouth) or watershed could contribute to river system integrity. Numerous benefits may result from managing an entire river or watershed, including the ability to design a holistic protection strategy in partnership with other agencies and the public.

North Skull Creek flows into Green River in Flaming Gorge Reservoir, a popular reservoir for boating, fishing, skiing, jet skiing, houseboating, and other water sports.

13. The potential for water resources development. The intent of the Act is to preserve selected rivers in free-flowing condition and to protect their immediate environments.

There is no known potential water resources development.

Suitability Determination

Based on the information contained in this study, the Forest Service finds North Skull Creek to be not suitable for inclusion in the NWSRS. This is because other federal laws governing management of cultural resources are more appropriate for the protection of the identified ORV in the absence of other ORVs along the segment. Under the NHPA and in consultation with tribes, the Forest Service is adequately able to provide for protection of the resources.

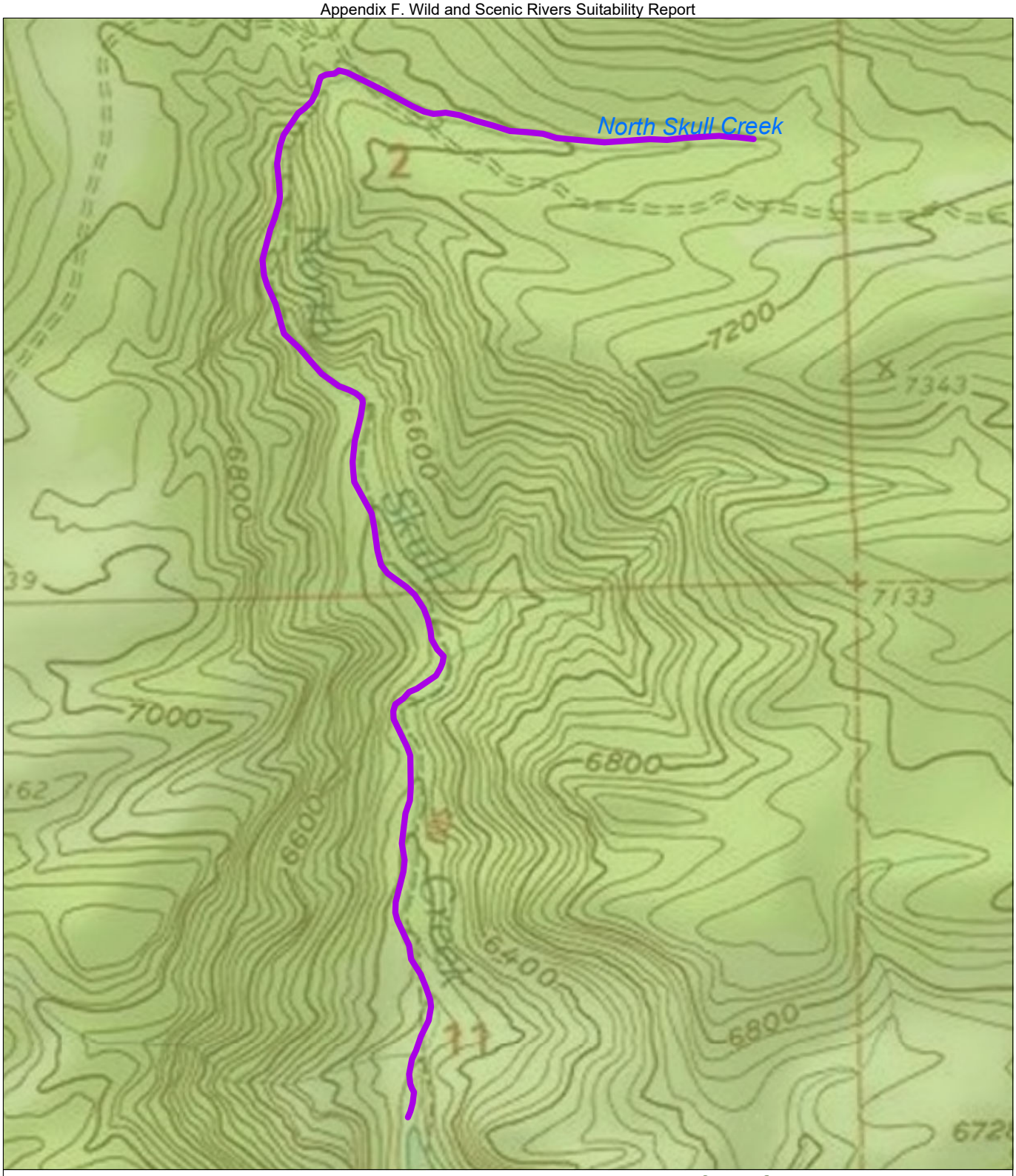

Figure F-4: North Skull Creek

Study segment

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0 375 750
Feet

Spring Creek 2

Legal Description:	From the headwaters south of Windy Ridge in the southeast quarter of Section 22, T.2N., R.19E. to the junction with the Flaming Gorge reservoir near the Sheep Creek Boat Ramp in the south half of Section 9, T.2N., R.20E.		
Total Segment Length:	6.8 miles	**Total Segment Area:**	2,151 acres
Length on FS Land:	6.8 miles	**Area on FS Land:**	2,151 acres
Preliminary Classification:	Recreational		
ORVs:	Cultural		

Suitability Assessment

1. Characteristics that do or do not make the area (the corridor) a worthy addition to the National System.

This segment includes 11 previously identified cultural resources. Ten are prehistoric sites (eight are considered eligible to the NRHP and two are not eligible), most of which are artifact scatters or rock shelters. There is also one site with both prehistoric and historic occupations that is considered eligible to the NRHP. Nine of the NRHP-eligible sites are in close proximity to the creek and include prehistoric storage structures and rock shelters that demonstrate long-term usage of the drainage during prehistory. The prehistoric use of the Spring Creek 2 corridor as a significant resource indicates there are cultural or historic values that are unique, rare, or exemplary within the region of comparison. Spring Creek 2 is accessible from the Flaming Gorge Uinta Scenic Byway, Sheep Creek Bay Road, and Death Valley Road.

2. The current status of land ownership and use in the area.

The segment area is entirely on National Forest System lands. Isolated patches are used for harvesting timber (89 acres in the segment area). Approximately two-thirds of the segment area is in roadless area (1,250 acres). The eastern two-thirds of the segment area is in the Flaming Gorge National Recreation Area. Highway 44 (Flaming Gorge-Uintas National Scenic Byway) with scenic overlooks and a few Forest Service roads pass through the area.

3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.

Existing levels of timber harvest and recreation have not been documented to impact the cultural resources along the stretch of river. Therefore, it is not reasonably foreseeable that these uses would need to be curtailed if designated. Cultural resources activities, such as research and education, could be enhanced.

4. The Federal agency that will administer the area should it be added to the National System.

The Forest Service would administer the segment area.

5. The extent to which the agency proposes that administration of the river, including the costs thereof, be shared by State and local agencies.

The Forest Service would be responsible for all administration of the river.

6. The need for, and cost to the United States of, acquiring lands and interests in lands and administering the area should it be added to the National System.

The segment area is entirely on National Forest System lands. The Forest Service already administers all lands in the segment area.

7. A determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the National System.

The Forest Service would continue all preservation and administration of the river.

8. The adequacy of local zoning and other land use controls in protecting the river's outstandingly remarkable values by preventing incompatible development.

The Ashley National Forest Plan may address the cultural resources that comprise the ORV for Spring Creek 2. Criteria for cultural ORVs includes the following:

The river or area within the river corridor contains a site(s) where there is evidence of occupation or use by Native Americans. Sites must be rare, have unusual characteristics, or exceptional human-interest value(s). Sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or cultural period was first identified an described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes.

The principal federal law addressing cultural resources is the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC Section 470), and its implementing regulations (36 Code of Federal Regulations [CFR] 800). These regulations, commonly referred to as the Section 106 process, describe the procedures for identifying and evaluating historic properties, for assessing the effects of federal actions on historic properties, and for project proponents consulting with appropriate agencies to avoid, reduce, or minimize adverse effects.

The primary objective of managing cultural resources is the protection of the resource from damage or destruction. To the extent consistent with protection, the Forest Service also manages cultural resources for scientific research, public education and enjoyment. Where interpretation of these sites for public benefit and knowledge is developed, it is required that this use be compatible with the protection of cultural resources.

9. The State or local government's ability to manage and protect the outstandingly remarkable values on non-Federal lands. This factor requires an evaluation of the river protection mechanisms available through the authority of State and local governments. Such mechanisms may include, for example, State-wide programs related to population growth management, vegetation management, water quantity or quality, or protection of river-related values such as open space and historic areas.

There are no non-Federal lands.

10. The consistency of designation with other agency plans, programs, or policies, and with meeting regional objectives. Designation may help or impede the goals of Tribal governments, or other Federal, State, or local agencies. For example, designation of a river may contribute to State or regional protection objectives for fish and wildlife resources. Similarly, adding a river that includes a limited recreation activity or setting to the National System may help meet State-wide recreation goals for that activity or setting. Designation might, however, limit irrigation and/or flood control measures in a manner inconsistent with regional socioeconomic goals.

There are no other agency plans, programs, or policies to consider, because the segment area is entirely on National Forest System lands.

11. Support or opposition to designation. Assessment of this factor will define the political context. The interest in designation or nondesignation by other Federal agencies; State, local and Tribal governments; national and local publics; and the State's Congressional delegation should be considered.

The State of Utah opposes the use of interim protection measures for the river segment until specific designation by Congress or the Utah State Legislature.

The Southwest River Protection Program supports the ORV and preliminary classification. It also recommends the additional preliminary classification of scenic, especially for the middle portion of the stream because it is neither crossed nor directly paralleled by roads, in order to enhance protection of the stream and its corridor.

The organizations American Whitewater and American Rivers have commented that the Forest Service should remove the suitability analysis from the plan entirely and not rely upon or reference past unsuitability findings.

12. The river's contribution to river system or basin integrity. This factor reflects the benefits of a "systems" approach. For example, expanding the designated portion of a river in the National System or developing a legislative proposal for an entire river system (headwaters to mouth) or watershed could contribute to river system integrity. Numerous benefits may result from managing an entire river or watershed, including the ability to design a holistic protection strategy in partnership with other agencies and the public.

Spring Creek 2 flows into Sheep Creek Bay in Flaming Gorge Reservoir, a popular reservoir for boating, fishing, skiing, jet skiing, houseboating, and other water sports.

13. The potential for water resources development. The intent of the Act is to preserve selected rivers in free-flowing condition and to protect their immediate environments.

There is no known potential water resources development.

Suitability Determination

Based on the information contained in this study, the Forest Service finds Spring Creek 2 to be not suitable for inclusion in the NWSRS. This is because other federal laws governing management of cultural resources are more appropriate for the protection of the identified ORV in the absence of other ORVs along the segment. Under the NHPA and in consultation with tribes, the Forest Service is adequately able to provide for protection of the resources.

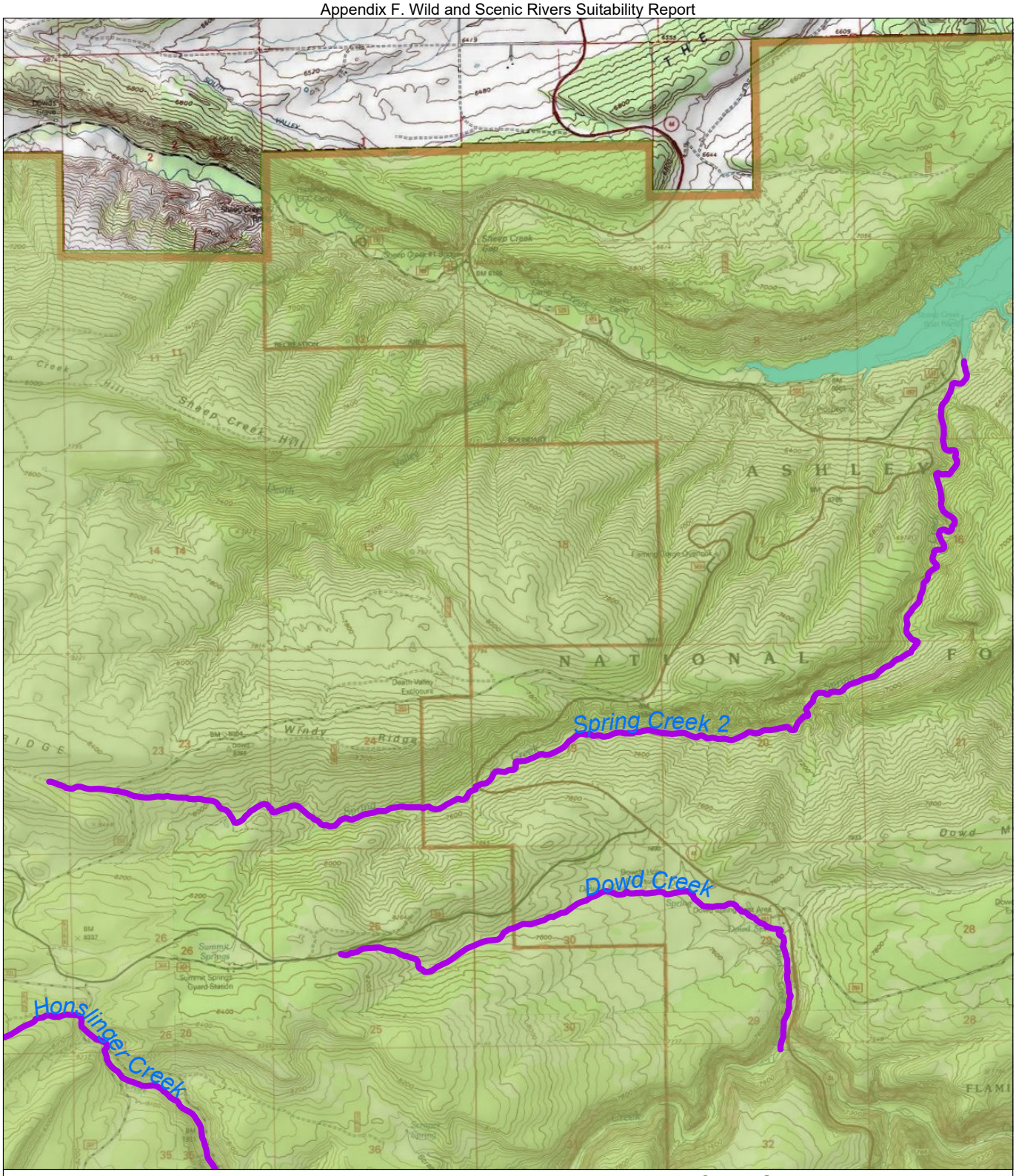

Figure F-5: Spring Creek 2

Study segment

Flaming Gorge Reservoir

Source: Forest Service GIS 2017
March 10, 2023
R4WSR_Ashley_2020suitable_SpringCreek2_V01.pdf

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N

0 1,500 3,000

Feet

Next Steps

Alternatives and Plan Components

The four eligible rivers were included in alternative C. In addition, two rivers are recommended as suitable based on the 2008 suitability study are included in all alternatives (Forest Service 2008; Forest Service GIS 2020):

- Green River below the Flaming Gorge Dam (13 miles, scenic classification)
- Upper Uinta River including Gilbert Creek, Center Fork, and Painter Draw (40 miles, wild classification)

The land management plan and final EIS analyze potential impacts from inclusion in the NWSRS. Until an eligible river is released from its status as eligible through the record of decision on the proposed forest plan and final EIS, interim management for the protection of the river's ORVs and free-flowing condition will continue (see **Interim Management**). For river segments determined to be suitable, management sufficient to maintain its ORVs and free-flowing condition will occur via the plan components identified in the record of decision for the forest plan.

In accordance with FSH 1909.12 83.32d, during the plan revision process the suitability of the river for designation should be evaluated with the alternatives. An analysis of the existing situation provides the foundation for alternative development. The type and range of alternatives to consider will vary depending on the affected environment, issues, and opportunities associated with each specific river. The array of alternatives presented must be broad enough to encompass all reasonable proposals for use of the river area. Each alternative should be clear as to whether the river segment is found suitable or not suitable. If the emphasis of an alternative is to protect ORVs by means other than designation, included in that alternative should be any plan components needed to do so.

Generally, the following types of alternatives should be considered:

1. The no action alternative, which maintains current management; this alternative is required.
2. An alternative in which all eligible river segments are found suitable and are recommended for Congressional designation.
3. An alternative in which some eligible segments are found suitable and are recommended for Congressional designation, while other eligible segments are found not suitable. This type of alternative may also include a recommendation to designate eligible segment(s) at a less restrictive classification (for example, scenic to recreational) to allow a specific resource activity.
4. An alternative in which no eligible segments are found suitable and in which protection of river values in eligible segments will be by means other than Congressional designation. This type of alternative could also conclude that all or part of the river is not suitable for designation and no longer needs interim protection measures.
5. An alternative in which no eligible river segments are found suitable for designation.

Interim Management

Forest Service-identified rivers determined to be eligible and suitable are afforded interim protective management until a decision is made on the future use of the river and adjacent lands through an act of Congress or a determination that the river is not suitable. It is the Forest Service's policy to manage and

protect the free-flowing character, preliminary classification, and identified ORVs of eligible or suitable rivers. The planning rule at 36 CFR 219.10 provides for interim management of Forest Service-identified eligible or suitable rivers or segments to protect their values. Interim protective measures for eligible or suitable segments are identified in FSH 1909.12 84. Interim protections for suitable segments are provided administratively by the management agency and are not provided legislative protection under the WSR Act. Legislative protection is provided only by formal designation by Congress. Once final determinations have been made, the Forest Service will draft protective management measures for each suitable segment.

A suitability determination requires environmental evaluation under the National Environmental Policy Act.

The Responsible Official may authorize site-specific projects and activities on National Forest System lands in the corridors of eligible or suitable rivers only where the project and activities are consistent with all of the following:

- The free-flowing character of the identified river is not adversely modified by the construction or development of stream impoundments, diversions, or other water resources projects.
- ORVs of the identified river area are protected.
- For all Forest Service-identified rivers, classification of an eligible river must be maintained as inventoried unless a suitability study is completed that recommends management at a less restrictive classification (such as from wild to scenic or scenic to recreational; Forest Service 2015).

Additional statutory, regulatory, or policy requirements may apply if the study river is located within a wilderness area or other designated area (see FSM 2354.42e).

Table F-3, below, describes the interim protection standards for Forest Service-identified eligible and suitable study rivers. Forest Plan components must meet the intent of these interim river protection measures (Forest Service 2015).

Table F-3. Interim Protection for Eligible or Suitable Wild and Scenic Rivers

Issue	Management Prescription/Action
Water Resources Projects	These projects will be analyzed as to their effect on a river's free flow, water quality, and ORVs, with adverse effects to be prevented to the extent of existing agency authorities (such as special-use authority).
Hydroelectric Power Facilities	Forest Service-identified eligible rivers are to be protected pending a suitability determination. Forest Service-identified suitable rivers are to be protected for their free-flowing condition, water quality, and ORVs pending a designation by Congress.

Issue	Management Prescription/Action
Minerals	Locatable Minerals: Existing or new mining activity on a Forest Service-identified eligible or suitable river are subject to regulations in 36 CFR, Part 228, and must be conducted in a manner that minimizes surface disturbance, sedimentation, pollution, and visual impairment. Leasable Minerals: For all eligible or suitable rivers, leases, licenses, and permits under mineral leasing laws must include conditions necessary to protect the values of the river corridor that make it eligible or suitable for inclusion in the NWSRS. Saleable Minerals: Disposal of saleable mineral materials is prohibited for eligible or suitable rivers tentatively classified as wild. For segments tentatively classified as scenic or recreational, disposal of saleable mineral materials is allowed if the values for which the river may be included in the NWSRS are protected.
Transportation System	Wild: Roads and railroads are generally not compatible with a wild classification. Prevent actions related to the road system that would preclude protection of the river as wild. Do not plan roads outside of the corridor that would adversely affect the wild classification. New trail construction should generally be designed for nonmotorized uses. However, limited motorized uses that are compatible with identified values and unobtrusive trail bridges may be allowed. New airfields may not be developed. Scenic: New roads and railroads are permitted to parallel the river for short segments or bridge the river if such construction fully protects its values, including its free-flowing character. Bridge crossings and river water access are allowed. New trail construction or airfields must be compatible with and fully protect identified values. Recreational: New roads and railroads are permitted to parallel the river if such construction fully protects the river's values, including its free-flowing character. Bridge crossings and river access are allowed. New trail construction or airfields must be compatible with and fully protect identified values.
Utility Proposals	New transmission lines such as gas lines, water lines, and similar linear facilities are not compatible and are discouraged. Where no reasonable alternative exists, additional or new facilities should be restricted to existing rights-of-way. Where new rights-of-way would be necessary for a utility line, the proposed project must be evaluated as to its effect on the river's ORVs and classification. Any portion of a utility proposal that has the potential to affect the river's free-flowing character must be evaluated as a water resources project.

Issue	Management Prescription/Action
Recreation Development	Wild: As stated in the US Department of Agriculture/US Department of the Interior Guidelines, major public-use areas such as large campgrounds, interpretive centers, or administrative headquarters must be located outside the river corridor. Minimum facilities, such as toilets and refuse containers, may be provided if necessary to protect and enhance water quality and other identified river values, while also providing for public recreation uses that do not adversely impact or degrade those values. All facilities must be located and designed to harmonize with the primitive character, natural, and cultural settings of the river corridor. The facilities must protect identified river values, including water quality, and be screened from view from the river to the extent possible. Scenic: Public-use facilities such as moderate-size campgrounds, simple sanitation and convenience facilities, public information centers, administrative sites, river access developments, and so forth are allowed within the river corridor. All facilities must be located and designed to harmonize with their natural and cultural settings, protect identified river values, including water quality, and be screened from view from the river to the extent possible. Recreational: Recreation, administrative, and river access facilities may be located in close proximity to the river. However, recreational classification does not require extensive recreation development. All facilities must be located and designed to harmonize with their natural and cultural settings, protect identified river values, including water quality, and be screened from view from the river to the extent possible.
Motorized Travel	Wild: Motorized travel on land or water may be permitted but is generally not compatible with this classification. Where motorized travel options are deemed to be necessary, such uses should be carefully defined and impacts mitigated. Scenic and Recreational: Motorized travel on land or water may be permitted, prohibited, or restricted to protect the river values.
Wildlife and Fish Projects	Wild: Construction of minor structures and vegetation management to protect and enhance wildlife and fish habitat should harmonize with the area's essentially primitive character and fully protect identified river values. Any portion of a proposed wildlife or fisheries restoration or enhancement project that has the potential to affect the river's free-flowing character must be evaluated as a water resources project. Scenic: Construction of structures and vegetation management designed to protect and enhance wildlife and fish habitat should harmonize with the area's largely undeveloped character and fully protect identified river values. Any portion of a wildlife or fisheries restoration or enhancement project that has the potential to affect the free-flowing character must be evaluated as a water resources project. Recreational: Construction of structures and vegetation management to protect and enhance wildlife and fish habitat should fully protect identified river values. Any portion of a wildlife or fisheries restoration or enhancement project that has the potential to affect the river's free-flowing character must be evaluated as a water resources project.

Issue	Management Prescription/Action
Vegetation Management	Wild: Cutting of trees and other vegetation is not permitted except when needed in association with a primitive recreation experience, to protect users, or to protect identified ORVs. Examples of such exceptions include activities to maintain trails or suppress wildfires. Prescribed fire and wildfires managed to meet resource objectives may be used to restore or maintain habitat for threatened, endangered, or sensitive species or restore the natural range of variability. Scenic and Recreational: A range of vegetation management and timber harvest practices are allowed, if these practices are designed to protect users or protect, restore, or enhance the river environment, including the long-term scenic character.
Domestic Livestock Grazing	Wild: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area's essentially primitive character. Scenic: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area's largely undeveloped character. Recreational: D omestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable.

Source: Forest Service 2015

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Glossary

Classification. Identification of the class (wild, scenic, or recreational) that appropriately describes an eligible river, based on the criteria established in section 2(b) of the WSR Act (FSH 1909.12, Chapter 80, Section 80.5).

Determination. A finding in a study report that a river segment does, or does not, meet the criteria found in this chapter to be eligible; or a finding that an eligible river is or is not suitable for inclusion in the NWSRS (FSH 1909.12, Chapter 80, Section 80.5).

Eligible river. A river segment that has been evaluated, and found to be free-flowing and, in combination with its adjacent land area, possesses one or more ORVs (FSH 1909.12, Chapter 80, Section 80.5).

Forest Service-identified study rivers. Rivers that the Forest Service has identified for study to determine potential inclusion in the NWSRS, as directed under section 5(d)(1) of the WSR Act. These include the inventory of rivers being studied for eligibility, the eligible rivers being studied for suitability, and the rivers determined to be suitable and recommended for inclusion in the NWSRS but that are not yet designated (FSH 1909.12, Chapter 80, Section 80.5).

Outstandingly remarkable value (ORV). A scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar river-related value that is a unique, rare, or exemplary feature and is significant when compared with similar values from other rivers at a regional or national scale (FSH 1909.12, Chapter 80, Section 80.5).

River. A flowing body of water or estuary, or a section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes (FSH 1909.12, Chapter 80, Section 80.5).

River corridor. The geographic area generally encompassed within one-quarter mile on either side of the river's ordinary high water mark that is studied for eligibility or suitability and that contains the river and its ORVs (FSH 1909.12, Chapter 80, Section 80.5).

River segment. A distinct section of a river; in the context of wild and scenic river planning, refers to a distinct portion of a river that has a beginning, an endpoint, and specific classification. A river may be one segment with a classification or have multiple segments, each with a different classification (FSH 1909.12, Chapter 80, Section 80.5).

Study process. The generic term applied to both the process of inventorying rivers to determine if they are eligible for inclusion in the NWSRS or evaluating eligible rivers to determine if they are suitable for inclusion in the NWSRS (FSH 1909.12, Chapter 80, Section 80.5).

Study report. The documentation for the inventory and evaluation of wild and scenic river eligibility or suitability (FSH 1909.12, Chapter 80, Section 80.5).

Study river. See Forest Service-identified study rivers.

Suitable river. A river that a federal agency has studied and determined to be suitable for inclusion in the NWSRS but that has not been statutorily designated. A river found suitable for inclusion in the NWSRS is one that the Forest Service will recommend or has recommended for inclusion in the NWSRS (FSH 1909.12, Chapter 80, Section 80.5).

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Appendix G

Recommended Wilderness Analysis Process

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Appendix G. Recommended Wilderness Analysis Process

Recommended Wilderness Process

When developing or revising a forest plan, the Forest Service must identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands to be designated a wilderness. This is done in four steps: inventory, evaluation, analysis, and recommendations. The inventory and evaluation steps are completed: this appendix documents the inventory, evaluation, and analysis steps in the Forest Service Handbook 1909.12, chapter 70.

Notable Changes Between Draft and Final

Alternative B was replaced with alternative B modified in the final EIS. No areas were recommended for wilderness in alternative B modified in the final EIS. The percent of recommended wilderness in the Flat Top Mountain wilderness inventory and South Slope East Uintas wilderness inventory area was update to 0 percent for alternative B modified.

Step 1: Identification and Inventory

The directives contain the framework of the wilderness recommendation process. The Forest Plan Revision interdisciplinary team developed the wilderness inventory areas based on the process in 1909.12-chapter 70 section 71.

Developing the Inventory

The primary function of the identification and inventory step is to efficiently and effectively identify all lands within the plan area that may have wilderness characteristics as defined in the Wilderness Act of 1964 (16 *United States Code* 1131-1136, 78 Stat 890), using a transparent process. Lands included in the inventory are documented and identified on a map and carried forward for further evaluation.

To develop the inventory of lands on the Ashley National Forest that may be suitable for recommendation as wilderness, three categories of inventory criteria were used (size, forest roads improvements, and other improvements) and information obtained during our *Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest* (USDA Forest Service 2017), as directed by the Forest Service Handbook, and additional public input. The Ashley National Forest utilized existing databases and geospatial data as sources of information for the inventory process, which are dynamic and may change over time.

It is important to note that lands included in the inventory provide a starting point for further evaluation, and their inclusion is not a designation that conveys or requires a particular kind of management.

Size Criteria (FSH 1909.12, 71.21)

According to the Wilderness Act, a wilderness area "[h]as at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition" (16 U.S.C. 1131c). Areas to be included in the inventory must be federal lands and must meet one of the following size criteria:

1. The area contains 5,000 acres or more.
2. The area contains less than 5,000 acres but is of sufficient size as to make practicable its preservation and use in an unimpaired condition, including but not limited to areas contiguous to an existing wilderness, primitive areas, administratively recommended wilderness, or wilderness inventory of other Federal ownership.

The Ashley National Forest inventory includes lands over 5,000 acres that meet the remaining criteria, and areas less than 5,000 acres that are adjacent to the High Uintas Wilderness.

Improvements (FSH 1909.12, 71.22)

Lands to be considered for inventory may or may not have improvements. Improvements consist of things that show evidence of human activities such as roads, structures, or past management activities. The presence of such improvements does not necessarily exclude areas for consideration in the inventory.

Forest Road[1] Improvements

The following areas with road improvements were included in the inventory. Guidance on forest road improvements considered can be found in FSH 1909.12, chapter 70, section 71.22a.

1. Areas that contain operational maintenance level 1 (see Glossary for definition) forest roads.
2. Areas with routes that are decommissioned, unauthorized or temporary, or forest roads that are identified for decommissioning in a previous decision document or in travel management plan or travel analysis.
3. Areas with forest roads that are identified to be reclassified to maintenance level 1 in a previous decision document or in a travel management plan or travel analysis.
4. Areas with forest roads that were proposed for consideration as recommended wilderness in the 1986 Forest Plan or areas with forest roads that the Responsible Official merits for inclusion in the inventory that were proposed for consideration through public involvement during the assessment or other public or intergovernmental participation opportunity.
5. Areas with historic wagon routes, historic mining routes, or other settlement era transportation features considered part of the historical and cultural landscape of the area.

The areas excluded from the inventory contained the following road improvements:

1. Permanently authorized roads validated by a Federal court or the Department of the Interior for which a valid easement or interest has been properly recorded.
2. Forest road maintained to levels 3, 4, and 5 operational maintenance level.
3. Forest roads maintained to operational maintenance level 2. The 2009 Ashley National Forest Travel Management Record of Decision identified the level 2 roads for continued public access.

[1] A forest road is defined as a road wholly or partly within or adjacent to and serving the National Forest System that the Forest Service determines is necessary for the protection, administration, and utilization of the System and the use and development of its resources (36 CFR 2112.1).

Other Improvements

Other improvements on the Ashley National Forest were reviewed to determine whether to include or exclude areas in the inventory (table G-1, next page). Guidance on improvements considered can be found in FSH 1909.12, chapter 70, section 71.22b.

Table G-1. Wilderness Inventory Improvements

Improvement Type	Remarks
Airstrips	No airstrips exist on the Ashley National Forest.
Heliports	No heliports exist on the Ashley National Forest.
Vegetation treatments that are not substantially noticeable.	Vegetation treatments were included in the inventory. The definition for substantially noticeable, and how the team used the concept in the inventory, is presented in appendix A.
Timber harvest areas where logging and prior road construction are not substantially noticeable.	Timber harvest areas where logging and prior road construction are not substantially noticeable were included in the inventory. Areas were regeneration harvest had taken place within the last 40 years were excluded from the inventory, as well as a ½ buffer from the regeneration harvest. The definition for substantially noticeable, and how the concept was used in the inventory is presented in appendix A.
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their maintenance and access needs is minimal.	It was determined that the vertical structures in step 2 of the inventory had a minimal impact, including their maintenance and access requirements; therefore, areas with vertical structures were included in the inventory.
Areas of historic mining where impacts are not substantially noticeable.	Areas of historic mining activity on the Ashley National Forest primarily consist of small hand dug pits, therefore these areas were included in the inventory as they are not substantially noticeable.
Areas of mining activity where impacts are not substantially noticeable.	The areas of current mining activity on the Ashley National Forest were found to be substantially noticeable and were excluded from the inventory.
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	Range improvements such as chainings were excluded from the inventory if they were substantially noticeable. Minor structural improvements such as troughs and fences were found to be not substantially noticeable and were included in the inventory.
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps. As a general rule, do not include developed sites. Areas with minor, easily removable recreation developments may be included.	Areas with dispersed camping sites and outfitter camps were included in the inventory as they are temporary and easily removed. Areas with developed recreation sites were excluded from the inventory. Trails are not considered to be a recreational improvement and remained in the inventory.

Improvement Type	Remarks
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared rights-of-way, pipelines, and other permanently installed linear right-of-way structures.	Whether powerlines or pipelines were included or excluded depended on what type they are. Most powerlines had a cleared corridor and were not included in the wilderness inventory. Oil and gas pipelines and large water transmission lines were not included in the inventory. Small, buried water transmission lines were included in the wilderness inventory.
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions. Areas may include minor watershed treatments that have been accomplished manually such as small hand-constructed gully plugs.	Areas of watershed treatment are very limited on the Ashley National Forest, one contoured area that was found to be substantially noticeable was excluded from the inventory.
Lands adjacent to develop or activities that impact opportunities for solitude. The fact that the non-wilderness activities or used can be seen or heard from within any portion of the area, shall not, or itself, preclude inclusion in the inventory.	Areas adjacent to development or activities were included in the inventory.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	Areas with structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area were included in the inventory.

Final Inventory Results

The final inventory comprises 28 polygons over 5,000 acres and 4 polygons less than 5,000 acres that are adjacent to the High Uintas Wilderness, for a total of 590,788 acres (about 43% of the Ashley National Forest). The wilderness evaluation, the second step, will take a more detailed look at these inventoried areas to determine how well they meet wilderness characteristics using a set of criteria based on the Wilderness Act of 1964.

Table G-2. Final Wilderness Inventory

Area	Acres	Area	Acres
Mill Hollow	6,301	Flat Top Mtn	20,010
Indian Springs	5,573	Pole Creek	13,207
Alkali Canyon	20,306	Cow Hollow	18,028
Right Fork Indian Canyon	46,310	Dyer Mtn	7,788
Nutters Canyon	6,642	South Slope East Uintas	135,466
Cottonwood	26,585	Grizzly Ridge	6,734
Wire Fence	22,239	Lambson Draw	5,005
Water Hollow	5,007	Mt Lena	34,114
Timber Canyon East	10,479	Carter Creek	7,853
Timber Canyon West	24,552	North Slope East Uintas	66,791
Wagon Road Ridge	5,063	Sheep Creek East	7,579

Area	Acres	Area	Acres
Big Ridge	23,666	Sheep Creek West	7,382
South Fork Rock Cr	8,925	Goslin	7,066
Dry Ridge	23,509	Four areas less than 5000 acres and adjacent to existing wilderness	384
Lake Fork Mtn	18,063	**Total**	**590,270**

Step 2: Evaluation

The results of the wilderness evaluation process for 32 wilderness inventory polygons on the Ashley National Forest follow. Each of the 32 polygons in the wilderness inventory were evaluated using criteria from Forest Service Handbook 1909.12 chap. 70. The Regional and Forest planning teams developed measures for these criteria to address the specific questions posed by the criteria and provide a consistent way to evaluate each area in the wilderness inventory.

This section presents the wilderness evaluations for the 32 wilderness inventory polygons, presented in alphabetical order.

Alkali Canyon – 181

Total acres: 20,306

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of; 2% Basin Big Sagebrush, 2% Black Sagebrush, 5% Douglas fir, 1% Grass, 2% Greasewood, 1% Mountain Brush, 26% Mountain Big Sagebrush, 2% Persistent Aspen, 58% Pinyon – Juniper, 1% Wyoming Big Sagebrush, and less than 1% of Rubber Rabbit Brush and Seral Aspen.

The vegetation in the southern portion of the area consists of sparse grass and sagebrush and/or pinyon pine and juniper. The central portion of the area has moderately dense pinyon pine and juniper along the ridges intermixed with perennial grasses and mountain mahogany. The northern part of the area has sparse pinyon pine-Douglas fir–juniper on the south to west aspects and moderately dense pinyon pine-Douglas fir or perennial grasses-sagebrush-mountain mahogany on the north to east aspects.

The area provides habitat for a variety of wildlife including Bandtailed Pigeons, Black Bear, Blue Grouse, Mule Deer, Pronghorn, Elk, and Greater Sage Grouse.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.02%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%

Measures for 1a and 1b	Outcome
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The current vegetation within this inventory areas is partially affected by natural ecological processes. The mountain big sagebrush communities in this inventory polygon have a fire regime of 1, and a condition class of 2. The pinyon juniper communities have a fire regime of 1 and a condition class of 2. There have been no wildfires in the in the past 60 years. A small area, 20 acres, of the inventory area was burned in 2007 for a sage grouse habitat burn study. Portions of the inventory area were cleared of pinion pine-juniper in the past.

There are five Forest Service System roads cherry stemmed into the polygon, two of these roads, Alkali Canyon and Right Fork Indian Canyon, extend over four miles into the polygon. There are three Forest Service System trails open to all motor vehicles in the southern part of the area. Several unauthorized routes exist, primarily in the southern half of the inventory area.

The inventory area has two range allotments, Sowers Canyon and Anthro Mountain. There is a boundary fence on the forest on the northern boundary that marks the border between the Ashley National Forest and the Uintah and Ouray Indian Reservation. There are three other range fences as well as multiple range spring developments, troughs, and reservoirs. There is one guzzler in the northwestern corner of the inventory area.

There are two abandoned well pads in the southwestern portion of the area. One active well pad in the far northern portion of the area is cherry stemmed out of the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None present
Heliports	None present
Vegetation treatments that are not substantially noticeable.	19.30 acres @ 0.10%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None

Improvement Type	Extent of Departures (acres)
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	70 acres @ 0.35%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	None
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared rights-of-way, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	There are five planned well pads in the northwestern portion of the area.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	20,304 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads

The northern boundary, which is the northern boundary of the Forest, is immediately adjacent to the Uintah and Ouray Indian Reservation lands. The southern boundary is the southern boundary of the Forest and is immediately adjacent to lands administered by the Bureau of Land Management. The western boundary is Forest Service Road 335, which separates the inventory area from the Nutters Canyon inventory area. The eastern boundary is adjacent to Ashley National Forest lands not included in the inventory.

Describe the general topography of the area in context of sight, sound, and screening

The terrain consists of broad plateaus with moderately steep dissected side slopes above narrow valleys. Hills are rounded in the north. Pinyon pine, Douglas fir, and juniper cover the northern part of the area and many of the canyon walls and drainages in the south. Across the tops of the southern plateaus the cover opens to sagebrush and grass with areas of mountain mahogany.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities including camping, hiking, hunting, and horseback riding, occur within the inventory area, mainly along the western and eastern boundary and in Alkali Canyon where road access exists. Much of the inventory area does not support primitive recreation activities because of a lack of attractions and access routes.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 6,358 acres (Semi-Primitive non-motorized) @ 31.31% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors on the western, eastern, and southern boundaries disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0% @ 0 acres
Outstanding landscapes in acres/% total (extremely steep break land, cliffs).	0% @ 0 acres

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
Many historic and prehistoric surveys have been performed in the area and multiple eligible prehistoric sites have been found.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area spans two watersheds, Nutters Canyon on the west side and Left Fork Antelope Canyon on the east side, with Right Fork Antelope ridge separating the watersheds. Nutters Canyon has a

watershed condition class of functioning at risk and Right Fork Antelope Canyon has a watershed condition class of functioning properly.

The inventory area is part of the Green River City municipal watershed

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural area is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The shape is irregular, long and narrow, with multiple excluded authorized roads and other excluded areas partially dissecting the area. The area boundary is tied to roads on the south, west, and east.
Describe if there are any legally established rights or uses within the area.	There are portions of 11 oil and gas leases in the area. Seven are active and 4 are inactive. The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states “Avoid designation of additional areas within the county as federally designated wilderness…”
Describe the management of adjacent lands.	Bureau of Land Management are managed for multiple use. Uintah and Ouray Indian Reservation lands are managed for multiple use and there is significant oil and gas development. The adjacent Ashley National Forest lands are managed for multiple use.

Measures for 4a	Outcome
Describe the management of adjacent lands.	Bureau of Land Management are managed for multiple use. Uintah and Ouray Indian Reservation lands are managed for multiple use and there is significant oil and gas development. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	36% MA d (High Forage Production and Livestock Utilization); 8% MA e (Wildlife Habitat Emphasis); 1% MA f (Dispersed Recreation Roaded); 55% MA n (Range of Resources Uses and Outputs)
Acres and % total of wildland urban interface in the area.	2,736 acres @ 13.48%
Type and extent of management restrictions within the area.	97.4% of the inventory area is Inventoried Roadless Area.

Big Ridge – 274

Total acres: 23,666

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 3% Alpine, 1% Douglas fir, 9% Engelmann Spruce, 2% Fell-field, 1% Grass, 2% Lodgepole Pine, 15% Mixed Conifer, 9% Mountain Big Sagebrush, 1% Riparian Non-Willow Shrub, 21% Persistent Aspen, 5% Rock, 30% Seral Aspen, and less than 1% Alpine vegetation, Cottonwood, Meadow grasses and forbs, and Mountain Big Sagebrush.

In the northern part of the inventory area the vegetation on the steep canyon slopes includes Douglas fir, ponderosa pine; and mixed lodgepole pine, Engelmann spruce and subalpine fir. The drainage ways on these slopes have a vegetative cove of Engelmann spruce – subalpine fir/aspen, lodgepole pine with scattered Engelmann spruce/subalpine fir, mixed Douglas fir/common juniper/aspen/limber pine, and mountain brush.

In the upper reaches above timberline of Big Ridge, Log Hollow, Wedge Hollow, Burnt Ridge, Hell Hole, and Upper Basin, the vegetative cover includes Engelmann spruce, alpine sedge grass and forbs, with inclusion of Krumholtz Engelmann spruce and subalpine fir.

In the middle reach of the inventory area, Log Hollow and Big Ridge, the cirque basins have scatted spruce/fir cover. There is also hummocky topography with lodgepole pine, Engelmann spruce and subalpine fir.

The vegetation in the Upper Basin area includes Engelmann spruce-subalpine fir with some scattered Douglas fir and minor inclusions of big sagebrush/grass.

In the southern part of the inventory area the dominate overstory includes Douglas fir, aspen, subalpine fir, Engelmann spruce and lodgepole opine with mountain big sagebrush and grass at lower elevations.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, and Wild Turkey.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.77%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The persistent Aspen communities have a fire regime of 3 and condition class of 2. The mixed conifer communities in the western portion of the inventory area have a fire regime of 3 and a condition class of 2. The mixed conifer communities in the central part of the inventory area have a fire regime of 1 and a condition class of 2. The mixed conifer communities in the eastern and north central part of the inventory area have a fire regime of 1 and a condition class of 2. The mountain brush communities in the western part and eastern part of the inventory area have a fire regime of 1 and a condition class of 2. The mountain brush communities in the central part of the inventory area have a fire regime of 3 and a condition class of 2.

There have been no identified wildfires in the area in the past 70 years.

A broadcast burn along the McAfee basin road occurred in 2013. Two individual tree selection harvests occurred in 1990.

There are 6 Forest Service system roads cherry stemmed out of the inventory area. There are two motorized trails in the inventoried area, #1145 and #1213, for a total of 7 miles. There are multiple unauthorized routes in the inventory area, primarily along south facing slopes and ridgelines south of Burnt Ridge and on Big Ridge.

The inventory area contains all or parts of four grazing allotments: Blind Stream, Log Hollow, McAfee Basin, and Rock Creek. There are multiple spring developments, stock troughs, pipelines, and fences. The greatest concentration of range improvements are located south of Burnt Ridge.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	83 acres @ 0.35%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None

Improvement Type	Extent of Departures (acres)
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	95 acres @ 0.40%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are multiple dispersed camping spots throughout the inventory area. The largest concentrations occur in Log Hollow and along the Blind Stream road.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared rights-of-way, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	Private and Tribal lands adjacent to the southern border and primarily undeveloped.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	Remnants of logging operations are evident along the McAfee Basin road.

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	23,657 acres @ 99.96%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
The inventory area borders private range lands on the southern border.

Describe the general topography of the area in context of sight, sound, and screening
The northern part of the inventory area includes steep highly dissected north facing slopes with steep canyon slopes.

In the middle portion of the inventory area including Big Ridge, Log Hollow, Wedge Hollow, Burnt Ridge, Hell Hole, and Upper Basin areas there are steep to very steep sloping terrain and defined ridges and drainages. The upper reaches of these areas are rolling uplands, the middle reaches include cirque basins and canyons separated by high ridgelines.

The southern portion of the area is gentle south facing slopes and dissected, moderately steep terrain.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occur within the inventory area, mainly along the Blind Stream Road and in McAfee Basin, Log Hollow, Corral Creek, and Burnt Ridge.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 7,463 acres (Semi-Primitive non-motorized) @ 31.53% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	23.5% @ 5553 acres
Acres of fens and ground water dependent ecosystems	0.05% @ 12 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	43% @ 10,229 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
Big Ridge peak has an elevation of 11,095 feet.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	4,981 acres @ 21.04%
Outstanding landscapes in acres/% total (extremely steep break land, cliffs).	204 acres @ 0.86%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been minimal historic and prehistoric surveys in the area. Historic and prehistoric sites have been identified but none have been found to be eligible.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area spans seven watersheds. The watershed condition class for each watershed is Blind Stream - functioning at risk, Rudy Hollow – Duchesne River - functioning at properly, South Fork Rock Creek – functioning properly, Farm Creek – functioning properly, Cabin Creek – Rock Creek –

functioning properly, Corral Creek – Rock Creek – functioning at risk, and Carter Creek – Rock Creek – functioning at properly.

The inventory area is part of the Central Utah WCD – Duchesne Valley and Green River City municipal watersheds.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural area in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The shape of the area is primarily blocky and is dissected by four cherry stemmed roads. The western boundary is defined by the Blind Stream Road, the south boundary by the Forest boundary, the east boundary by the Forest boundary and roads, and the north boundary is not defined by any landmarks and is difficult to define from the surrounding area.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The inventory area is bordered on the south by private range lands and on the south and east by the Uintah and Ouray Indian Reservation. These lands are primarily undeveloped. The adjacent Ashley Forest Service lands are managed for multiple use.

Measures for 4a	Outcome
Describe the current management of the area.	2% MA b (Moderate Timber Production); 1% MA d (High Forage Production and Livestock Utilization); 13% MA f (Dispersed Recreation Roaded); 4% MA g (Undeveloped Dispersed Recreation – Unroaded); 4% MA k (Maximum Water Yield Recreation); 76% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	23,651 acres @ 99.93%
Type and extent of management restrictions within the area.	97.5% of the inventory area is Inventoried Roadless Area.

Carter Creek – 526

Total acres: 7,854

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation within the inventory area consists of 1% Douglas fir, 2% Lodgepole Pine, 18% Mixed Conifer, 1% Mountain Big Sagebrush, 11% Pinyon-juniper, 66% Ponderosa Pine, 1% Seral Aspen, and less than 1% Riparian conifer and Meadow grasses and forbs.

Ponderosa Pine covers most of the Greendale Plateau within the inventory area. The north facing slopes of the Carter Creek drainage has mixed conifer and the south facing slopes of Carter Creek drainage has pinyon and juniper. The Eagle Creek drainage has a vegetative cover of mixed conifer.

The area provides habitat for a variety of wildlife including Bandtailed Pigeons, Black Bear, Blue Grouse, Chukar, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, and Wild Turkey.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	98.64%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. Weeds are limited to roads, trails, and dispersed camping locations in the inventory area.

<u>Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.</u>
The Ponderosa pine communities have a fire regime of 1 and condition class of 3. The mixed conifer communities have a fire regime of 4 and condition class of 2. The Mountain Big Sagebrush communities have a fire regime of 1 and condition class of 2. The mountain brush communities have a fire regime of 2 and condition class of 2.

The Burnt Creek wildfire occurred in 2000 in the inventory area.

There have been multiple individual tree selection harvests throughout the inventory area in the 1980s and early 1990s.

There are seven Forest Service system roads cherry stemmed into the inventory area. There are some unauthorized routes the inventory area. The majority in the eastern side of the inventory area.

The inventory area contains parts of the Lonesome Park and Lewis/Allen grazing allotments. There are 3 stock ponds and two wildlife guzzlers in the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	2,731 acres @ 34.78%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	12 acres @ 0.15%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Dispersed camping locations are scattered throughout the inventory area. The majority occur on south slope of Dowd Mountain.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared rights-of-way, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None

Improvement Type	Extent of Departures (acres)
Lands adjacent to development or activities that impact opportunities for solitude.	The east side of the inventory area is adjacent to the Red Canyon Recreation Corridor. The corridor is a high use area including a paved road, visitor center, day use area, and campgrounds. The east side of the inventory area also includes to private inholdings that include private residences and agricultural lands.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	7,853 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	2,544 acres @ 32.40%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is bordered by State Highway 44 on the west and in three places on the southern boundary. Highway 44 is also within 0.6 miles of the inventory area boundary on the southern border. There are two private inholdings, developed with private residences and outbuildings within the inventory area**.**

Describe the general topography of the area in context of sight, sound, and screening
The Greendale Plateau within the inventory area is relatively flat with two steep sided canyons, Carter Creek and Eagle Creek, incised through the plateau.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, hiking, camping, horseback riding, hunting, cross country skiing, and snow shoeing are some primitive activities in the inventory area.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 3,616 acres (Semi-Primitive non-motorized) @ 46.04% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0.01% @ 1 acre
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors on the western, eastern, and southern boundaries disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	2,938 acres @ 37.42%
Outstanding landscapes in acres/% total (extremely steep break land, cliffs).	130 acres @ 1.65%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been multiple historic and prehistoric surveys in the area. Multiple eligible prehistoric sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of three watersheds, Lower Carter Creek on the west side, Skull Creek – Green River on the east side, and Horseshoe Canyon – Green River on the northern side. Lower Carter Creek has a watershed condition class of functioning at properly, Skull Creek – Green River has a watershed condition class of functioning at risk, and Horseshoe Canyon – Green River has a watershed condition class of functioning properly.

The inventory area is part of the Dutch John Town municipal watershed.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural area in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area is shape is irregular with 9 roads cherry stemmed into the area. The area is bounded by roads on the south and east side. A road and powerline form the boundary on the east. A road forms part of the northern boundary. The remainder of the northern boundary is not tied to a geographic location and is difficult to distinguish from the surrounding area not included in the inventory.
Describe if there are any legally established rights or uses within the area.	There are three Ditch Bill Easements adjacent to the inventory area, Center Fork Eagle Creek Ditch, Aztec Ditch, and Eagle Creek Ditch.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The Daggett County General 2017 Resource Management Plan states; "Wilderness designation is not an appropriate, effective, efficient, economic or wise use of land.
Describe the management of adjacent lands.	The lands adjacent to the inventory area to the north, east, and on part of the west side is the Flaming Gorge National Recreation Area. The Ashley National Forest lands are multiple use. The two private inholdings within the inventory area are private residences
Describe the current management of the area.	93% MA n1 (NRA existing situation); 7% MA r (Wildlife) The entire inventory area is within the Flaming Gorge National Recreation Area.
Acres and % total of wildland urban interface in the area.	100% @ 7,853 acres
Type and extent of management restrictions within the area.	30% of the inventory area is Inventoried Roadless Area.

Cottonwood – 187

Total acres: 26,585

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation within the inventory area consists of 3% Alder-leaf Mountain Mahogany, 1% Basin Big Sagebrush, 1% Black Sagebrush, 17% Douglas fir, 6% Grass, 3% Mountain Brush, 13% Mountain Big Sagebrush, 40% Pinyon and Juniper, 1% Rubber Rabbitbrush, 12% Seral Aspen, 1% Tall Willow, and less than 1% of Cottonwood, Greasewood, Persistent Aspen, Ponderosa Pine, Serviceberry, and Yellowbrush.

The drainages that descend to the Left Fork Indian Canyon in the western portion of the inventory area have Douglas-fir and mixed coniferous forest stands with and without seral aspen at higher elevations. At mid elevations these drainages have a cover of dense stands of Douglas fir and aspen on north aspects and sparse pinyon pine and Douglas fir on south aspects. On the less steep slopes al all aspects grass and sagebrush, and mountain mahogany is prevalent. At the lower elevations the drainages that descend to Left Fork Indian Canyon have moderately dense pinyon pine and juniper, with patchy areas of perennial grass and mountain mahogany.

The drainages that descend to Sowers Canyon have sparse pinyon pine, Douglas fir, and juniper with the amount of Douglas fir increasing with elevation. The north to east aspects have either moderately dense pinyon pine and Douglas fir or perennial grass, sagebrush, and mountain mahogany. At lower elevations, the drainages have a very sparse vegetative cover of scattered pinyon pine and juniper, and perennial grasses.

The inventory area provides habitat for two endemic plants, Erigeron untermannii, Indian Canyon fleabane, and Mentezelia goodrichi, Goodrich's blazingstar.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Pronghorn, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, and Greater Sage Grouse.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	97.72%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to road corridors in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mountain big sagebrush communities on the west side of Tabby Canyon have a fire regime of 1 and a condition class of 3 and on the east side of Tabby Canyon a fire regime of 1 and condition class of 2. The mountain brush communities have a fire regime of 2 and a condition class of 2. The pinyon pine-juniper communities have a fire regime of 3 and a condition class of 2. The Douglas fir communities have a fire regime of 3 and condition class of 2.

The Church Camp fire in 2012 burned over 2,900 acres in the inventory area. There have been no other wildland fires in the past 60 years.

There are eight Forest Service System road cherry stemmed into the inventory area, the longest being 1.3 miles. Several unauthorized routes exist, primarily in the drainage bottoms.

The inventory area has portions of three range allotments, Sowers Canyon, Cottonwood, Left Fork Indian Canyon, and Right Fork Indian Canyon. There are boundary fences on the forest on the northern boundary that marks the border between the Ashley National Forest and the Uintah and Ouray Indian Reservation. There are multiple other range fences as well as multiple range spring developments, troughs, and reservoirs and one buried range pipeline.

There are three active oil and gas well pads in the northern portion of the area that are cherry stemmed out of the inventory area and one active oil and gas well pad on the northeastern boundary of the inventory area. There are six planned well pads with associated planned pipelines that have been excluded from the northeastern portion of the inventory area.

There is a powerline with a partially cleared corridor the runs along the eastern boundary of the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	None
Timber harvest areas where logging and prior road construction are not substantially noticeable.	311 acres
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	4.98 acres
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None

Improvement Type	Extent of Departures (acres)
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	116 acres @ 0.44%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Several dispersed camping locations are in the Left Fork of Indian Canyon on the western boundary of the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	21 acres
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	Three active oil and gas well pads are cherry stemmed out of the inventory area. The inventory area is bordered in portions on the west and east by private inholdings. There are 3 private inholdings that are surrounded by the inventory area.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	The Indian Canyon Guard Station is within the inventory area.

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	26,584 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads

State Highway 191 forms the western border of the inventory area. The inventory area borders a private inholding in the Left Fork of Indian Canyon and private inholdings in Sowers Canyon. There are three private inholdings within the inventory area. The Argyle Canyon county road is south of the inventory area and at its closest point is 0.25 miles from the inventory area**.**

Describe the general topography of the area in context of sight, sound, and screening

The southern boundary of the inventory area is delineated by the north ridgeline of Argyle Canyon/Bad Land Cliffs. Immediately north of this ridgeline, the topography is dissected by numerous drainages that descend to the bottom of the upper (southern) end of Left Fork Indian Canyon. Another ridgeline breaks

off the north ridge line of Argyle Canyon/Bad Lands Cliffs and descends north and east to the heads of Cottonwood Canyon and Tabby Canyon and beyond. This ridge line divides the western and eastern halves of the undeveloped area, with drainages descending north and west from the ridge line to the bottom of Left Fork Indian Canyon, and south and east from the ridge line to the bottom of Sowers Canyon.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
This area offers primitive recreation opportunities including backpacking, hunting, hiking, and horseback riding. Most of the primitive recreation activities occur along the canyon bottoms of Left Fork Indian Canyon, Cottonwood Canyon, and Sowers Canyon. Few primitive recreation activities occur on the side slopes of the numerous side canon areas, due to steep terrain and limited access routes.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 9,199 acres (Semi-Primitive non-motorized) @ 34.60% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Major road corridors adjacent to the east and west boundaries of the inventory area, and off the Forest, and oil and gas production, have disrupted wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
The western boundary of the inventory area is State Highway 191 which is part of the Dinosaur Diamond Scenic Byway.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	5,497 acres @ 20.68%
Outstanding landscapes in acres/% total (extremely steep break land, cliffs).	51 acres @ 0.19%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
The Historic Elkhorn Guard Station is located on the western edge of the inventory area in the Left Fork of Indian Canyon.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area spans four watersheds, Left Fork Indian Canyon and Cottonwood Canyon on the western side and portions of Lance Canyon-Sowers Canyon and Tabby Canyon – Sowers Canyon on the east side. Left Fork Indian Canyon. All four watersheds have a watershed condition class of functioning at risk.

The inventory area is part of the Green River City watershed.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural area in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area is shaped like an inverted wishbone, with Forest Service lands excluded from the inventory area in the north central portion. The inventory area boundary on the east and west are roads and on the north and south the Forest boundary.
Describe if there are any legally established rights or uses within the area.	There are portions of 2 active oil and gas leases in the inventory area. The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management states “Avoid designation of additional areas within the county as federally designated wilderness…”

Measures for 4a	Outcome
Describe the management of adjacent lands.	The inventory area is adjacent to the Uintah Ouray Indian Reservation and private lands to the north. The reservation lands are managed for oil and gas production. The inventory area is adjacent to BLM and state lands to the south, which are managed for multiple use. Private lands also border the inventory area to the south. These lands are primarily undeveloped. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	39% MA d (High Forage Production and Livestock Utilization); 1% MA e (Wildlife Habitat Emphasis); 9% MA f (Dispersed Recreation Roaded); 51% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	14,616 acres @ 54.98%
Type and extent of management restrictions within the area.	99.5% of inventory area is Inventoried Roadless Area.

Cow Hollow – 440

Total acres: 18,028

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 26% Lodgepole Pine, 1% Meadow, 63% Mixed Conifer, 1% Mountain Big Sagebrush, 3% Persistent Aspen, 5% Seral Aspen, and less than 1% of Curl-leaf Mountain Mahogany, Douglas fir, Engelmann Spruce, Fringed Sagebrush, Mountain Brush, and Riparian Non-willow Shrub.

The headwaters of Ashley Creek vegetative cover are mixed conifer and lodgepole pine and the plateau between Black Canyon and Ashley Gorge is lodgepole pine. The west facing canyon slope of Ashley Gorge is mixed conifer. The plateau lands between Ashley Gorge and eastern boundary of the inventory area is a mixture of seral Aspen and persistent Aspen.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.99%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	99.99%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mixed conifer communities in the inventory area have a fire regime of 4 and a condition class of 2, except for the mixed conifer communities in the north central part of the inventory area which have a fire regime of 3 and condition class of 2. The Mountain Big Sagebrush communities have a fire regime of 2 and a condition class of 1.

A regeneration clear cut timber harvest was done in 1950 in the northwest side of the inventory area adjacent to the Sims Peak road. Individual tree selection harvest was done by Sims Peak in 1950, 1962, and 1969.

There are two Forest Service system roads cherry stemmed into the inventory area. There are numerous unauthorized routes. The majority occur on the east side of the inventory area above Ashley Gorge. There are four trails open to 50-inch vehicles or less in the inventory area, #0110, #1196, #0011, #0034 and #0026. There is one trail open to all vehicles in the inventory area, #0109.

The inventory area contains parts of two range allotments, Black Canyon and Taylor Mountain Complex. There is one spring development, one stock pond, one trough, one reservoir, one pipeline, and four fences.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	**Extent of Departures (acres)**
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	51 acres @ 0.28%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	63 acres @ 0.35%
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	7 acres @ 0.04%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Dispersed camping location primarily occur on the east side of the inventory area above Ashley Gorge.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	None identified
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	18,015 acres @ 99.93%
Area and % total available for winter non-motorized opportunity	2,213 acres @ 12.28%

Describe the proximity to private lands and non-Forest Service roads
The inventory area borders Bureau of Land Management lands for 0.25 miles on the southern border. The BLM lands are undeveloped**.**

Describe the general topography of the area in context of sight, sound, and screening
The northern part of the inventory area is moderately rolling terrain with weakly dissected drainages and the drainages become steeper to the south.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, fishing, and horseback riding occur within the inventory area, primarily in the northern part of the inventory area which has multiple trails for access.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 9,426 acres (Semi-Primitive non-motorized) @ 52.28% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0.24% @ 43 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	13.9% @ 2,507 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors surrounding the inventory area disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
The eastern side of Ashley Gorge is included in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	6,183 acres @ 34.30%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	370 acres @ 2.05%

Measure for 3b: Description of any unique geologic features in the area.

Ashley Gorge is an extremely rugged and steep canyon area with steep slopes and rock outcrops.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Multiple eligible historical sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of six watersheds, Black Canyon has a watershed condition class of functioning at properly, Ashley Gorge has a watershed condition class of functioning properly, South Fork Ashley Creek has a watershed condition class of functioning properly, North Fork Ashley Creek has a watershed condition class of functioning properly, Headwaters of Big Brush Creek has a watershed condition class of functioning at risk, and Davis Hollow – Big Brush Creek has a watershed condition class of functioning properly.

The inventory area is part of the Ashley Water system for Vernal Utah, the Deseret Generation and Transmission Co-op, and Green River City municipal water systems.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
Portions of two research natural areas are within the inventory area, Sims Peak – Potholes and Ashley Gorge. Sim Peak Potholes RNA was established in 1991 for the features of; seral lodgepole pine with subalpine fir and Engelmann spruce understory, sedge dominated pothole wetlands, and rare plants. The Ashley Gorge RNA was established in 1996 for the features of; Blue spruce, lodgepole pine, and aspen woodlands, shrub lands with mountain mahogany and snowberry, moderate-gradient perennial stream, and rare plants.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	1,459 acres @ 8.09%

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area is very irregularly shaped. The inventory area boundaries are primarily not tied to geographic locations and are difficult to distinguish between areas not included in the inventory.
Describe if there are any legally established rights or uses within the area.	None identified

Measures for 4a	Outcome
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The 2017 Uintah County Resource Management Plan states "The County does not support designation of additional areas within the County as federally designated Wilderness".
Describe the management of adjacent lands.	The inventory area is primarily adjacent to Ashley National Forest lands managed for multiple use. A small part of the southern boundary of the inventory area is adjacent to Bureau of Land Management lands managed for multiple use.
Describe the current management of the area.	4% MA a (Research Natural Area Candidates); 1% MA b (Moderate Timber Production); 26% MA f (Dispersed Recreation Roaded); 4% MA g (Undeveloped Dispersed Recreation – Unroaded); 65% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	100% @ 18,028 acres
Type and extent of management restrictions within the area.	98.4% of the inventory area is Inventoried Roadless Area.

Dry Ridge – 325

Total acres: 23,509

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 1% Alder-leaf Mountain Mahogany, 4% Alpine, 1% 17% Engelmann Spruce, 3% Grass, 5% Lodgepole Pine, 34% Mixed Conifer, 8% Mountain Big Sagebrush, 11% Persistent Aspen, 1% Pinyon – juniper, 2% Ponderosa Pine, 3% Rock, 8% Seral Aspen, and less than 1% Cottonwood, Fell-field, Meadow, Mountain Brush, and Riparian Non-Willow Shrub.

The steep west facing slopes of Rock Creek have a dominate overstory of scattered mixed conifer including Douglas fir, Engelmann spruce, subalpine fir and lodgepole pine, with some intermixed aspen and mountain brush/grass species. Along the northern boundary tree cover includes Engelmann spruce and subalpine fir with Douglas fir, Engelmann spruces, aspen and scattered lodgepole pine and subalpine on the colluvial scarp slopes.

In upper Peterson Gulch the vegetation consists of an Engelmann spruce, lodgepole pine, Douglas fir-aspen dominated overstory with inclusions of subalpine fir. In lower Peterson Gulch the most common vegetative cover is mountain big sagebrush and grass.

The Dry Canyon area vegetation consist of aspen with inclusion of Douglas fir scattered throughout and small groups of lodgepole pine.

On the eastern side of the inventory area the vegetation from the Slate Creek drainage to Dry Canyon consists of Douglas fir, ponderosa pine, lodgepole pine, Engelmann spruce and subalpine fir. Along the top of Dry Ridge, the vegetative cover is seral lodgepole with small amounts of Douglas fir and aspen.

South of Dry Canyon the gently rolling plateaus have a vegetative cover of seral lodgepole stands and small amounts of Douglas fir and aspen.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Greater Sage Grouse, Moose, Mountain Goat, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, Whitetailed Ptarmigan, and Wild Turkey.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.85%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mixed conifer communities in the western, eastern, and south-central portions of the inventory area have a fire regime of 3 and a condition class of 2. The mixed conifer communities in the north central part of the inventory area have a fire regime of 4 and a condition class of 2. The Mountain Big Sagebrush communities have a fire regime of 1 and a condition class of 2.

There have been no identified wildfires in the area in the past 70 years.

One regeneration harvest clear cut occurred in 1965 and two individual tree selection harvests occurred in 1975. One broadcast burn was completed in 2014 on the west side of the inventory area. One pre-commercial thinning projects was completed in 2013 on the east side of the inventory area.

There is a weather station along the Dry Ridge road.

There are multiple unauthorized routes in the inventory area, primarily surrounding the Dry Ridge road and on the south side of the inventory area on the treeless south facing slopes and ridges and in the drainage bottoms between the ridges.

The inventory area contains all or parts of four grazing allotments; Rock Creek, Dry Ridge, Pigeon Water, and Lake Fork. There are multiple spring developments, stock troughs, pipelines, and fences.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	783 acres @ 3.33%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	80 acres @ 0.35%
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	3.62 acres
Areas of historic mining where impacts are not substantially noticeable.	The Uintah Mountain Copper Company iron oxide mine is located within the inventory area as it is not substantially noticeable.
Areas of mining activity where impacts are not substantially noticeable.	None

Improvement Type	Extent of Departures (acres)
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	106 acres @ 0.45%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are dispersed camping locations along the Dry Ridge Road and in other locations in the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is adjacent to the Rock Creek road and private inholdings in the Lake Fork and Rock Creek drainages.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	23,509 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0.06 acres @ 0.0002%

Describe the proximity to private lands and non-Forest Service roads
Private inholdings are adjacent to the inventory area on the west and east boundaries. Uintah

Describe the general topography of the area in context of sight, sound, and screening
The west facing slope of Rock Creek Canyon consists of cliffs and steep outcrops on the upper valley walls. Along the northern boundary of the inventory area the terrains are gently sloping ridgetops with colluvial scarp slopes. In upper Peterson Gulch there are steep canyon side slopes extending from the ridge tops to the valley bottom. These slopes have a ridge and furrow texture and the intervening gullies are very steep. The Dry Canyon area on the west side of Dry Ridge has moderate to steep slopes of substantial relief.

On the east ridge of Dry Ridge, the topography between the Slate Creek drainage to Dry Canyon consists of steep canyon slopes and steep gullies. South of Dry Canyon there are gently rolling plates cut be a few, widely spaced, shallow drainage ways.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, fishing, and horseback riding occur within the inventory area, mainly in the Dry Ridge area, Miners Gulch, and along the Paint Mine road.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0.49 acres (Primitive); 10,431 acres (Semi-Primitive non-motorized) @ 44.37% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	12.7% @ 2981 acres
Acres of fens and ground water dependent ecosystems	0.003% @ 1 acre
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	21.5% @ 5,066 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	9,252 acres @ 39.36%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	209 acres @ 0.89%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Eligible historic sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of six watersheds, Cabin Creek – Rock Creek has a watershed condition class of functioning properly, Corral Creek – Rock Creek has a watershed condition class of functioning at risk, Brown Duck Creek – Lake Fork River has a watershed condition class of functioning properly, Petty Creek – Lake Fork River has a watershed condition class of functioning at risk, Upper Pigeon Water Creek has a watershed condition class of functioning at risk, and Carter Creek Rock Creek has a watershed condition class of functioning properly.

The inventory area is part of the Central Utah WCD – Duchesne Valley, and Green River City municipal water systems.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural area in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is irregular. The northern boundary is defined by the boundary of the High Uintas Wilderness. The southern boundary is adjacent to the Forest boundary and Ashley National Forest lands not included in the inventory. The western boundary is partially defined by the Rock Creek road and the other parts of the western boundary are not distinguishable from other Ashley National Forest lands not included in the inventory. The eastern boundary is not distinguishable from other Ashley National Forest land not included in the inventory.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.

Measures for 4a	Outcome
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The High Uintas Wilderness is adjacent to the inventory area to the north. The High Uintas Wilderness is managed according the 1984 Utah Wilderness Act. The Uintah and Ouray Indian Reservation is adjacent to the south and are primarily undeveloped. On the eastern boundary the inventory area is adjacent to Ashley National Forest lands not included in the inventory. All of the Ashley National Forest non-wilderness lands are managed for multiple use. The inventory area is adjacent to the Moon Lake Recreation Complex, which includes a highly popular campground and lodge.
Describe the current management of the area.	7% MA f (Dispersed Recreation Roaded); 10% MA g (Undeveloped Dispersed Recreation – Unroaded); 3% MA k (Maximum Water Yield Recreation); 80% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	18,948 acres @ 80.60%
Type and extent of management restrictions within the area.	94.9% of the inventory area is Inventoried Roadless Area.

Dyer Mtn – 450

Total acres: 7,788

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 1% Alder-leaf Mountain Mahogany, 4% Alpine, 1% Douglas fir, 17% Engelmann Spruce, 3% Grass, 5% Lodgepole Pine, 34% Mixed Conifer, 8% Mountain Big Sagebrush, 11% Persistent Aspen, 1% Pinyon – juniper, 2% Ponderosa Pine, 3% Rock, 8% Seral Aspen, and less than 1% Cottonwood, Fell-field, Meadow grasses and forbs, and Riparian Non-Willow Shrub.

The mixed conifer in the northern half of the inventory consists of subalpine fir, spruces, and grouse whortleberry, with a lodgepole pine over story. The wetter areas in low swales support more Engelmann spruce and subalpine fir. In the southern half of the inventory area the vegetative cover consists of Douglas fir and lodgepole pine. Aspen, sedge-bluegrass, and wet meadow vegetation is found along the bottoms of Anderson and Loco Creeks.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	100%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	99.99%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. Weeds are limited in the inventory area.

<u>Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.</u>
The mixed conifer communities in the north part of the inventory area have a fire regime of 4 and a condition class of 2. The mixed conifer communities in the south part of the inventory area have a fire regime of 3 and a condition class of 1. The Mountain Big Sagebrush communities have a fire regime of 1 and a condition class of 2.

A regeneration clear cut timber harvest was done in 1945 on the west side of the inventory area. Three individual tree selection harvests were done in 1945 and 1970. An improvement cut was done on the east side of the inventory area in 1970.

There are seven Forest Service system roads cherry stemmed into the inventory area. There are numerous unauthorized routes. The majority occur on the south end and central part of the inventory area. There are two trails open to 50-inch vehicles or less in the inventory area, #0071 and #0070.

The inventory area contains parts of three range allotments, Taylor Mountain Complex, Lonesome Park, and Iron Springs. There is on stock reservoir in the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	**Extent of Departures (acres)**
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	115 acres @ 1.48%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	17 acres @ 0.21%
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	Mining activity has occurred around Dyer Mountain
Areas of mining activity where impacts are not substantially noticeable.	There is a small gravel pit on south boundary of the inventory area.
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	1 acre @ 0.01%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are dispersed camping sites primarily in the southern part of the inventory area
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The private inholding on Dyer Mountain has private homes

Improvement Type	Extent of Departures (acres)
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	7,785 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
There are three private inholdings within the inventory area. Private homes have been constructed adjacent to the inventory area boundary private lands east of Dyer Mountain. A private inholding in present at the head of Anderson Creek contains a smelter structure and old cabin structures. The third private inholding is not developed**.**

Describe the general topography of the area in context of sight, sound, and screening
The inventory area consists of gently rolling topography of low relief in the northern portion of the area and moderately steep side slopes associated with Dyer Mountain and canyon side slopes of Anderson and Loco Creeks.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occur within the inventory area.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 3,218 acres (Semi-Primitive non-motorized) @ 41.32% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0.12% @ 9.5 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors surrounding the inventory area disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0 acres @ 0%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	0 acres @ 0%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Multiple eligible historic sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of four watersheds, Upper Little Brush Creek has a watershed condition class of functioning at risk, Headwaters Big Brush Creek has a watershed condition class of functioning at risk, Middle Little Brush Creek has a watershed condition class of functioning at risk, and Davis Hollow - Big Brush Creek has a watershed condition class of functioning properly.

The inventory area is part of the Central Utah WCD – Ashley Valley, Deseret Generation and Transmission Co-op, and Green River City municipal water systems.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural area in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area is irregular and has three inholdings within it. The southern boundary is defined by roads. The west, south, and eastern boundaries are primarily not tied to geographic locations and the area is difficult to identify from the surrounding area not included in the inventory

Measures for 4a	Outcome
Describe if there are any legally established rights or uses within the area.	None identified
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The 2017 Uintah County Resource Management Plan states "The County does not support designation of additional areas within the County as federally designated Wilderness".
Describe the management of adjacent lands.	Two of the private inholdings are primarily undeveloped. The Dyer Mountain inholding has private homes. The Ashley National Forest lands surrounding the inventory area are managed for multiple use.
Describe the current management of the area.	4% MA d (High Forage Production and Livestock Utilization); 34% MA f (Dispersed Recreation Roaded); 62% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	7,392 acres @ 94.92%
Type and extent of management restrictions within the area.	94.9% of the inventory area is Inventoried Roadless Area.

Flat Top Mtn – 365

Total acres: 20,010

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 1% Alpine vegetation, 9% Engelmann Spruce, 14% Lodgepole Pine, 3% Meadow grasses and forbs, 22% Mixed Conifer, 1% Mountain Brush, 1% Mountain Big Sagebrush, 8% Persistent Aspen, 8% Ponderosa Pine, 5% Rock, 27% Seral Aspen, and less than 1% Douglas fir and Serviceberry.

The vegetation in the inventory area transitions from conifer forests in and meadows in the south to high elevation "bollies" in the northern portion. In the Upper Dry Gulch drainage, the vegetative cover is seral lodgepole stands with small amounts of Douglas fir and aspen. Lower Dry Gulch drainage as aspen, scattered Douglas fir and small groups of lodgepole pine. Flat Top Mountain has lodgepole pine with inclusions of Engelmann spruce, subalpine fir, and some Douglas fir.

At the upper end of Crow Canyon and Timothy Creek the major plant communities of the alpine ridges are cushion plan and sedge-geum. Below tree line the vegetation includes Engelmann spruce, subalpine fir, whortleberry, gooseberry and carex.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Greater Sage Grouse, Moose, Mountain Goat, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, Whitetailed Ptarmigan, and Wild Turkey.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.94%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mixed conifer communities have a fire regime of 3 and a condition class of 2. The Ponderosa pine communities have a fire regime of 4 and a condition class of 2. The Mountain Big Sagebrush communities have a fire regime of 1 and a condition class of 2.

A small part of the inventory area was burned in the Swift Creek fine in 2003.

Multiple individual tree selection harvests were completed in the 1980s. These primarily occurred west and south of Heller Lake and between Dry Gulch Creek and the Jackson Park road. Pre-commercial thinning was also completed in the 2007 and 2008 between Dry Gulch Creek and the Jackson Park road.

There are three Forest Service system roads cherry stemmed into the inventory area. There are multiple unauthorized routes in the inventory area, primarily between Dry Gulch Creek and the Jackson Park road and west of Heller Lake. The inventory area contains parts of the Yellowstone OHV trail, #1128.

The inventory area contains parts of three grazing allotments; Yellowstone, Dry Gulch, and Uinta Rec Livestock. There are seven spring developments, 9 stock troughs, 2 pipelines, and 2 fences.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	1,458 acres @ 7.29%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	42 acres @ 0.21%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	An outfitter camp is permitted in the Lily Pad Lake area and multiple dispersed camping locations mainly in the southern part of the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None

Improvement Type	Extent of Departures (acres)
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The Uintah and Ouray Indian Reservation lands to the east and south are primarily undeveloped
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	26,584 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is partially bordered on the east by the Uintah and Ouray Indian Reservation**.**

Describe the general topography of the area in context of sight, sound, and screening
The topography consists of moderately sloping terrain and glaciated valleys. The terrain at the upper end of Crow Canyon and Timothy Creek consists of gently to moderate rolling upland surface that form the crest of the Uinta Range. The terrain on the south side of the inventory area is gently slopes plateau lands.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, backpacking, camping, hiking, hunting, and horseback riding occur within the inventory area, mainly along the Jackson Park trail #1055 and around Lily Pad Lakes.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 15,166 acres (Semi-Primitive non-motorized) @ 75.79% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	10.2% @ 2,034 acres
Acres of fens and ground water dependent ecosystems	0.2% @ 41 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	30.2% @ 6,053 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no outstanding landscape features in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	1,284 acres @ 6.24%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	3 acres @ 0.01%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been minimal historic and prehistoric surveys in the area. No eligible sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of five watersheds, Swift Creek has a watershed condition class of functioning at risk, Crystal Creek – Yellowstone River has a watershed condition class of functioning at properly, Timothy Creek has a watershed condition class of functioning properly, West Fork Dry Gulch Creek has a watershed condition class of functioning at risk, and Headwaters Dry Gulch Creek has a watershed condition class of functioning properly.

The inventory area is part of Green River City municipal water system.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural area is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is irregular with 3 roads cherry stemmed into it. The inventory area borders the High Uintas Wilderness to the north, partially borders the Uintah and Ouray Indian Reservation to the east, and Ashley National Forest lands not included in the inventory to the west, south, and east.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes. The Heller Lake and Dam Ditch Bill Easement is surrounding by the inventory area.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The non-wilderness Ashley National Forest lands are managed for multiple use. The adjacent Uintah and Ouray Indian Reservation lands are primarily undeveloped. The adjacent High Uintas Wilderness is managed according to the 1984 Utah Wilderness Act.
Describe the current management of the area.	10% MA f (Dispersed Recreation Roaded); 1% MA g (Undeveloped Dispersed Recreation – Unroaded); 1% MA k (Maximum Water Yield Recreation); 88% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	411 acres @ 2.05%
Type and extent of management restrictions within the area.	88.8% of the inventory area is Inventoried Roadless Area.

Goslin – 583

Total acres: 7,066

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation within the inventory area consists of 3% Alder-leaf Mountain Mahogany, 1% Black Sagebrush, 7% Mountain Big Sagebrush, 89% Pinyon – juniper and less than 1% Basin Big Sagebrush, Fringed Sagebrush, and Wyoming Big Sagebrush.

Perennial grasses and annual forbs are the primary vegetative cover through much of the inventory area after the Pinyon – juniper was burned during the Mustang Ridge Fire in 2002. Mountain Mahogany is the common vegetative cover on the northern exposures. Pinyon – juniper occur in scattered locations, primarily on the eastern side of the inventory area.

The area provides habitat for a variety of wildlife including Black Bear, Blue Grouse, Chukar, Greater Sage Grouse, Moose, Mule Deer, Pronghorn, Elk, Snowshoe Hare, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	100%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The Wyoming Big Sagebrush communities have a fire regime of 3 and a condition class of 2. Much of the Pinyon – Juniper communities burned in the Mustang Ridge Fire in 2002. The remaining Pinyon – Juniper communities have a fire regime of 5 and condition classes of 2 and 3.

Much of the inventory area burned in the Mustang Ridge Fire in 2002.

There is one Forest Service system road cherry stemmed into the inventory area. There are a number of unauthorized routes in the northeastern part of the inventory area.

The inventory area contains parts of the Goslin Mountain BLM grazing allotment. There is one spring development, one stock pond, two stock troughs, one pipeline, and one fence in the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	895 acres @ 12.66%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	8 acres @ 0.11 acres
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are a few dispersed camping locations in the northeastern portion of the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	There are 4 country roads north of the inventory area. The Little Hole Road is 0.50 miles away from the inventory area at its closest point. This road receives moderate traffic during the springs, summer, and fall.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	7,066 acres @ 100%
Area and % total available for winter non-motorized opportunity	9 acres @ 0.13%

Describe the proximity to private lands and non-Forest Service roads
The inventory area borders private and state lands on the northern boundary, but most of the northern border is adjacent to Bureau of Land Management lands.

Describe the general topography of the area in context of sight, sound, and screening
The inventory area topography includes part of the southern and western slopes and plateau of the Goslin Mountain. The top of the plateau consists of long smooth slopes with low ridges and swales. The eastern portion of the inventory area includes some steep slopes descending to the Green River.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities in the inventory area is primarily hunting. Very little camping and hiking occur within the inventory area.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 4,641 acres (Semi-Primitive non-motorized) @ 65.68% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area is an important corridor for species moving from Browns Park to the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	2,969 acres @ 42.01%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	23 acres @ 0.33%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been multiple historic and prehistoric surveys in the inventory area and numerous eligible prehistoric sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of five watersheds, Spring Creek has a watershed condition class of functioning at risk, Dutch John Draw – Green River has a watershed condition class of functioning at properly, Pine Creek – Green River has a watershed condition class of functioning at risk, Goslin Creek – Green River has a watershed condition class of functioning properly, and Headwaters Dry Gulch Creek has a watershed condition class of functioning properly.

Part of the inventory area is included in the Dutch John Town municipal water system.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The shape is irregular and does not have any district topographic boundaries. The administrative boundaries do not distinguish the area from adjacent ownership.
Describe if there are any legally established rights or uses within the area.	None identified
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The Daggett County General 2017 Resource Management Plan states; "Wilderness designation is not an appropriate, effective, efficient, economic or wise use of land. These lands can be adequately protected with existing management options".

Measures for 4a	Outcome
Describe the management of adjacent lands.	The inventory area borders the Flaming Gorge National Recreation Area to the south and east. The northern and eastern sides border BLM, state, and a small amount of private lands which are primarily managed for grazing. The Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	56% MA e (Wildlife Habitat Emphasis); 31% MA f (Dispersed Recreation Roaded); 12% MA r (Wildlife) Part of the inventory area is within the Flaming Gorge National Recreation Area
Acres and % total of wildland urban interface in the area.	1,722 acres @ 24.37%
Type and extent of management restrictions within the area.	60.3 % of the inventory area is Inventoried Roadless Area.

Grizzly Ridge – 464

Total acres: 6,734

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 1% Douglas fir, 9% Lodgepole Pine, 59% Mixed Conifer, 2% Mountain Big Sagebrush, 28% Seral Aspen, 1% Subalpine fir, and less than 1% Meadow grasses and forbs and Riparian Non-willow Shrub.

The vegetative cover in the northern part of the inventory area consists of mixed conifer of subalpine fir, spruce, and grouse whortleberry, with a lodgepole pine over story. The wetter areas in swales support more Engelmann spruce and subalpine fir. South of Grizzly Peak the vegetative cover consists of Douglas fir and aspen. Open parklands and wet meadows occur in the southern portion of the inventory area. The dominant plants are grasses and forbs.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Elk, Ruffed Grouse, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.45%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	99.99%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%

Measures for 1a and 1b	Outcome
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mixed conifer communities in the north part of the inventory area have a fire regime of 4 and a condition class of 2. The mixed conifer communities in the south part of the inventory are have a fire regime of 3 and condition class of 1. The Mountain Big Sagebrush communities have a fire regime of 1 and a condition class of 2.

A regeneration clear cut timber harvest was done in 1965 in the northwest side of the inventory area. A large individual tree selection harvest was done on the south end of the inventory area in 1928.

There are four Forest Service system roads cherry stemmed into the inventory area. There are numerous unauthorized routes. The majority occur on the south end and central part of the inventory area. There are two trails open to 50-inch vehicles or less in the inventory area, #1025, #0047, #0011, #0153 and #0152B. There is one trail open to all vehicles in the inventory area, #0061.

The inventory area contains parts of three range allotments, Lonesome Park, Grizzly Ridge, and McKee Draw. There are no range improvements in the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	60 acres @ 0.90%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	55 acres @ 0.82%
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	4.34 acres
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	None

Improvement Type	Extent of Departures (acres)
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are multiple dispersed camping locations in the southeastern part.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared rights-of-way, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is adjacent to popular dispersed camping areas on the east and west sides.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	6,726 acres @ 99.89%
Area and % total available for winter non-motorized opportunity	9 acres @ 0.13%

Describe the proximity to private lands and non-Forest Service roads
United States Highway 191 is adjacent to the inventory area on the eastern boundary and at its closest point is 0.25 miles away and at its furthest is 1.7 miles away.

Describe the general topography of the area in context of sight, sound, and screening
The inventory area spans Grizzly Ridge in the southern part of the inventory area and the eastern slope of Grizzly Ridge in the northern part of the inventory area. Grizzly Ridge primarily runs north/south and consists of moderately step to steep side slopes.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, horseback riding, cross country skiing, and snowshoeing occur primarily on the east side of the inventory area.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 0 acres (Semi-Primitive non-motorized) @ 0% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0.13% @ 9 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors surrounding the inventory area disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0 acres @ 0%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	0 acres @ 0%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been minimal historic and prehistoric surveys in the inventory area and one eligible historic site has been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of four watersheds, Upper Little Brush Creek has a watershed condition class of functioning at risk, Ashley Gorge has a watershed condition class of functioning properly, Cart Creek has a watershed condition class of functioning at risk, Middle Little Brush Creek has a watershed condition class of functioning at risk, and Reader Creek has a watershed condition class of functioning properly.

The inventory area is part of the Dutch John Town, the Deseret Generation and Transmission Co-op, and Green River City municipal water systems.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is long and narrow. The area boundaries are not tied to geographic locations and are difficult to identify from the area not included in the inventory
Describe if there are any legally established rights or uses within the area.	None identified
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The 2017 Uintah County Resource Management Plan states "The County does not support designation of additional areas within the County as federally designated Wilderness".
Describe the management of adjacent lands.	The inventory area is adjacent to Ashley National Forest lands that are managed for multiple use.
Describe the current management of the area.	13% MA b (Moderate Timber Production); 25% MA f (Dispersed Recreation Roaded); 62% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	3,778 acres @ 56.11%
Type and extent of management restrictions within the area.	97.5% of the inventory area is Inventoried Roadless Area.

Indian Spring – 171

Total acres: 5,573

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 3% Douglas fir, 29% Mixed Conifer, 24% Mountain Brush, 17% Mountain Big Sagebrush, 6% Persistent Aspen, 1% Ponderosa Pine, 19% Seral Aspen, and less than 1% Yellowbrush.

The concave and flat areas along the ridge lines branching out from Reservation Ridge have a vegetative cover of subalpine fir and Douglas fir with and without aspen. Mountain big sagebrush/grass communities are common where tree cover is light. Spiked big sagebrush is found where snow persist into late June and July.

Intervening canyon side slopes and bottoms have a tree cover of Douglas fir and mixed coniferous stands. Seral aspen covers much of the lower and moderate gradients of all aspects and the canyon bottoms. Grasses and other herbaceous species are abundant on the steeper slopes with a southerly aspect.

Along lower elevations along the eastern boundary of the inventory area north facing slopes are usually covered with Douglas fir and pinyon pine-juniper, but no asper. The upper part of the north facing slopes are less steep and supports a shrub vegetation of mountain mahogany, bitterbrush, and sagebrush. The steeper south facing slopes have a cover of grass and some shrub vegetation.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Elk, Ruffed Grouse, and Snowshoe Hare. The area also includes the headwaters of Avintaquin Creek which contains a population of Colorado River Cutthroat trout.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	96.78%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. Weeds are limited in the inventory area and mainly occur along roads.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mountain brush communities have a fire regime of 2 and condition class of 2. The mixed conifer communities have a fire regime of 3 and a condition class of 3.

The Spring Fire wildfire in 2011 burned 695 acres of the inventory area and the Trail Ridge wildfire in 2009 burned 54 acres.

There are 6 Forest Service System roads cherry stemmed out of the inventory area, the longest being 1.9 miles. Trail 1097, open to vehicles 50 inches or less, extends 1.6 miles into the inventory area and trail 1100, open to all vehicles, extends 0.16 miles into the inventory area. Several unauthorized routes are present, with the majority leading to dispersed camping locations off of Reservation Ridge

The inventory area contains a portion of the Avintaquin range allotment. There is one stock trough and one stock pond in the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	None
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	10 acres @ 0.18%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Dispersed camping sites are primarily located along Reservation Ridge within the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None

Improvement Type	Extent of Departures (acres)
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is partially bordered on the east by private lands.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	Remnants of the Avintaquin Guard Station site remain within the inventory area.

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	5,571 acres @ 99.96%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
The inventory is partially bordered to the east by private lands.

Describe the general topography of the area in context of sight, sound, and screening
The terrain consists of west-to-east trending ridge and canyon bottom topography. Ridge, canyon bottoms, and stream courses generally descend in an easterly direction from Reservation Ridge. Ridgelines are broad, somewhat rounded or flat, and are interrupted and irregular intervals by steep shale knolls. Intervening canyons are moderately wide with moderately steep side slopes.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occurs within the inventory area, mainly along the west to east trending ridgelines.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 0 acres (Semi-Primitive non-motorized) @ 0% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Manti-La Sal National Forest to the south.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0 acres @ 0%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	0 acres @ 0%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
Remnants of the Avintaquin Guard Station are still present in the inventory area but do not qualify as an historical site. A limited number of historic and prehistoric surveys have been performed in the inventory area and no eligible sites have been located.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes portions of one watershed, Mill Hollow – West Fork Avintaquin, it has a watershed condition class of functioning properly. The watersheds are part of the Central Utah WCD – Duchesne Valley and Green River City watersheds.

The area includes the headwaters of Avintaquin Creek which contains a population of Colorado River Cutthroat trout.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	Irregular rectangle in shape and dissected by excluded cherry stemmed roads. Roads form the borders to the north, south, and west. The forest boundary is the inventory area boundary to the east.

Measures for 4a	Outcome
Describe if there are any legally established rights or uses within the area.	All lands within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The Uinta Wasatch-Cache National Forest is adjacent to the western boundary of the inventory and is designated as inventoried roadless area #418019. The inventory area is adjacent to private lands and the Horse Ridge Wildlife Management Area to the east. The private lands are minimally developed. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	29% MA d (High Forage Production and Livestock Utilization); 2% MA e (Wildlife Habitat Emphasis); 21% MA f (Dispersed Recreation Roaded); 48% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	5,552 acres @ 99.63%
Type and extent of management restrictions within the area.	99.5% of the inventory area is Inventoried Roadless Area.

Lake Fork Mountain – 343

Total acres: 18,063

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 1% Curl-leaf Mountain Mahogany, 1% Douglas fir, 11% Engelmann Spruce, 1% Grass, 5% Lodgepole Pine, 2% Meadow grasses and forbs, 38% Mixed Conifer, 1% Mountain Brush, 9% Mountain Big Sagebrush, 5% Persistent Aspen, 4% Pinyon – juniper, 3% Ponderosa Pine, 1% Rock, 20% Seral Aspen, and less than 1% Cottonwood, Low Willow, and Willow.

The vegetation in the Fish Creek and Raspberry Draw areas consist of a tree cover of lodgepole pine overstory and small amounts of aspen, Douglas fir, subalpine fir, and Engelmann spruce. There are two large wet meadows immediately south of Fish Creek, Little Meadow and Cow Park. In the moderately steep middle and upper Mackentire Draw area the vegetative cover includes Engelmann spruce and subalpine fir with aspen, lodgepole pine with scattered Engelmann spruce and subalpine fir, mixed Douglas fir, common juniper, aspen, and limber pine, and mountain brush. The lower Mackentire Draw area has scattered mixed conifer and mountain brush.

The eastern side slopes of Hells Canyon have a vegetation cover of Engelmann spruce, lodgepole pine, and Douglas fir and aspen with inclusion of subalpine fir. Hamison Basin has Ponderosa pine and manzanita on south and south easterly exposures and lodgepole pine on the northerly aspects.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Greater Sage Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, and Wild Turkey.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.79%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	99.99%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mixed conifer communities in the east and south parts of the inventory area have a fire regime of 3 and a condition class of 2. The mixed conifer communities in the north part of the inventory area have a fire regime of 4 and a condition class of 2. The Mountain Big Sagebrush communities have a fire regime of 1 and a condition class of 2.

There have been three identified wildfires in the area, one occurring in 1988 and two with no identified year.

There have been several small stands clearcut in the inventory area, as well as larger individual tree selection harvests. These primarily occurred around Center Park and Long Park in the northern part of the inventory area and around Salt Creek in the southern part of the inventory area. A broadcast burn was conducted in 2011 in the south part of the Yellowstone drainage on the east side of the inventory area. Pre-commercial thinning was also completed in this area as well as along Salt Creek.

There are six Forest Service system roads cherry stemmed into the inventory area. There are multiple unauthorized routes in the inventory area, primarily on south slope of Lake Fork Mountain and around Center Park in the northern part of the inventory area. The inventory area contains a portion of the Petty Mountain Loop OHV trail, #1127, as well as part of the Yellowstone OHV trail, #1128.

The inventory area contains parts of three grazing allotments; Petty Mountain, Yellowstone, and Lake Fork. There are multiple spring developments, stock troughs, pipelines, and fences.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	1560 acres @ 8.63%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	240 acres @ 1.33%
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	45 acres @ 0.25%

Improvement Type	Extent of Departures (acres)
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Dispersed camping locations occur in the inventory area, primarily along the Hells Canyon road and around the top of Lake Fork Mountain.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is adjacent to private inholdings along parts of the east and west boundaries. These private lands are developed with homes.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	Remnants of a Civilian Conservation Corp camp are located adjacent and partially within the

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	18,057 acres @ 99.97%
Area and % total available for winter non-motorized opportunity	0.01 acres @ 0.00007%

<u>Describe the proximity to private lands and non-Forest Service roads</u>
The inventory area is adjacent to private lands on portions of the western and eastern boundaries.

<u>Describe the general topography of the area in context of sight, sound, and screening</u>
The terrain on the eastern side of the Lake Fork drainage within the inventory area is steep dissected slopes. The terrain around Center Park is gently sloping with interspersed meadows. In Fish Creek and Raspberry Draw there are moderately sloping to very steep side slopes. In Upper Mackentire Draw there are moderately steep slopes with cliffs and steep bedrock outcrops on the upper valley walls. The Mule Creek and Perry Creek areas have gently sloping to moderately steep, long southerly facing slopes.

The eastern slopes of the Hells Canyon are steep in the upper end of the canyon and decrease in slope towards the forest boundary. Harmston Basin consists of sandy, boulder covered ridge and trough areas.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occur within the inventory area, mainly along the Fish Creek trail #1060, Toquer Lake trail #1185, and Center Park Trail #1059.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	4 acres (Primitive); 11,176 acres (Semi-Primitive non-motorized) @ 61.90% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	8.2% @ 1,482 acres
Acres of fens and ground water dependent ecosystems	0.7% @ 125 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	14.9% @ 2,685 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	4,421 acres @ 24.47%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	25 acres @ 0.14%

Measure for 3b: Description of any unique geologic features in the area.

Lake Fork Mountain to the east of Moon Lake has an elevation of 10,910 feet.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Eligible historic sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of four watersheds, Brown Duck Creek – Lake Fork River has a watershed condition class of functioning properly, Swasey Lakes – Yellowstone Creek has a watershed condition class of functioning properly, Petty Creek – Lake Fork River has a watershed condition class of

functioning at risk, and Crystal Creek – Yellowstone River has a watershed condition class of functioning properly.

The inventory area is part of the Green River City municipal water system.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area is shape is similar to a wishbone. The inventory area borders the High Uintas Wilderness to the north, the Uintah and Ouray Indian Reservation to the south and private lands and Ashley National Forest lands not included in the inventory. The eastern and western boundaries are not tied to any geographic locations and it is difficult to distinguish between lands within the inventory area and lands that are not.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states “Avoid designation of additional areas within the county as federally designated wilderness…”

Measures for 4a	Outcome
Describe the management of adjacent lands.	The adjacent Uintah and Ouray Indian reservation lands are primarily undeveloped. The private lands on the eastern and western boundaries are developed with private homes. The adjacent Ashley National Forest lands outside of the High Uintas Wilderness are managed for multiple use. The High Uintas Wilderness is managed according the 1984 Utah Wilderness Act
Describe the current management of the area.	7% MA f (Dispersed Recreation Roaded); 19% MA g (Undeveloped Dispersed Recreation – Unroaded); 74% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	5,931 acres @ 32.83%
Type and extent of management restrictions within the area.	80.5% of the inventory area is Inventoried Roadless Area.

Lambson Draw – 490

Total Acres: 5,005

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 8% Douglas fir, 1% Meadow grasses and forbs, 59% Mixed Conifer, 1% Ponderosa Pine, and 31% Seral Aspen.

The mixed conifer within the inventory area is composed of subalpine fir and spruce, with a lodgepole pine over story. Seral Aspen interspersed with lodgepole pine occurs on the south facing slope, north of Lambson Draw and on the western boundary above Davenport Draw.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Greater Sage Grouse, Moose, Mule Deer, Elk, Ruffed Grouse, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	100%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mixed conifer communities in the north part of the inventory area have a fire regime of 4 and a condition class of 2. The mixed conifer communities in the south-central part of the inventory are have a fire regime of 1 and condition class of 2. The Ponderosa pine communities have a fire regime of 1 and a condition class of 2.

There was one small wildfire in inventory area in 1994.

There is one Forest Service system roads cherry stemmed into the inventory area. There are no known unauthorized routes in the area.

The inventory area contains parts of 5 range allotments, Davenport, Little Davenport, Jackson Draw, Pot Creek, and Lambson Draw. There are no known range improvements.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	None
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	None
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	None identified
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	Private lands area adjacent to the inventory area. These lands are primarily undeveloped
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	5,005 acres @ 100%
Area and % total available for winter non-motorized opportunity	0.01 acres @ 0.00007%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is adjacent to private lands on west side and part of the east and south side. Private lands are also within the inventory area.

Describe the general topography of the area in context of sight, sound, and screening
The topography of the inventory area is gently rolling terrain between Davenport Draw and Lambson Draw and between Lambson Draw and Jackson Draw.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities are limited in the inventory area because of access, hunting is the primary activity that occurs.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 3,425 acres (Semi-Primitive non-motorized) @ 68.43% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors on the western and eastern sides disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0 acres @ 0%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	0 acres @ 0%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been minimal historic and prehistoric surveys in the area. One eligible historic site has been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of three watersheds, Goslin Creek – Green River has a watershed condition class of functioning properly, Pine Creek – Green River has a watershed condition class of functioning at risk, Matt Warner Reservoir has a watershed condition class of functioning properly, and the fourth watershed is outside of the Ashley National Forest watershed condition class framework.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is irregular. The borders are primarily the Ashley National Forest boundary and are not tied to geographic locations. The inventory area is difficult to distinguish from the surrounding lands.
Describe if there are any legally established rights or uses within the area.	None identified
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The 2017 Uintah County Resource Management Plan states "The County does not support designation of additional areas within the County as federally designated Wilderness".
Describe the management of adjacent lands.	The private lands adjacent of the inventory area are primarily undeveloped range lands. The Ashley National Forest lands adjacent are managed for multiple use.
Describe the current management of the area.	58% MA f (Dispersed Recreation Roaded); 3% MA g (Undeveloped Dispersed Recreation – Unroaded); 34% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	3,088 acres @ 61.69%
Type and extent of management restrictions within the area.	99.0% of the inventory area is Inventoried Roadless Area.

Mill Hollow – 44

Total Acres: 6,301

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 8% Douglas fir, 2% Grass, 16% Mixed Conifer, 10% Mountain Brush, 17% Mountain Big Sagebrush, 10% Persistent Aspen, 1% Pinyon – juniper, 1% Ponderosa Pine, 19% Seral Aspen, 3% Spike Big Sagebrush, 8% Subalpine fir, and 2% Yellowbrush.

The concave and flat areas along the ridge lines branching out from Reservation Ridge have a vegetative cover of subalpine fir and Douglas fir with and without aspen. Mountain big sagebrush/grass communities are common where tree cover is light. Spiked big sagebrush is found where snow persist into late June and July.

The canyons branching north from Reservation Ridge have a tree cover of Douglas fir and mixed coniferous forest stands. Seral aspen covers much of the lower and moderate gradients of all aspects and the canyon bottoms. Grasses and other herbaceous species are abundant on the steep slopes of drainages with a southerly aspect.

At lower elevations along the eastern boundary of the area north facing slopes are usually covered with Douglas fir and pinyon pine – juniper, but no aspen. The upper part of the north facing slopes supports shrub vegetation of mountain mahogany, bitterbrush, and sagebrush. The steeper south facing slopes have a cover of grass and some shrub vegetation.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Elk, Ruffed Grouse, and Snowshoe Hare. The area also includes the headwaters of Avintaquin Creek which contains a population of Colorado River Cutthroat trout.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.22%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mountain brush communities have a fire regime of 2 and condition class of 2. The mixed conifer communities have a fire regime of 3 and a condition class of 3.

The Mill Hollow wildfire in 2008 burned 722 acres of the inventory area and the Ridge wildfire in 2007 burned 35 acres.

A broadcast burn in 2012, burned 139 acres in the inventory area for wildlife habitat improvement.

There are 5 Forest Service System roads cherry stemmed into the inventory area, the longest being 2.8 miles. The Lind Ridge trail is open to all vehicles and extends 2.7 miles into the inventory area. Several unauthorized routes are present, with the majority leading to dispersed camping locations on Flat Ridge.

The inventory area contains a portion of the Horse Ridge range allotment and portion of the Avintaquin range allotment. There are four identified spring developments.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	139 acres @ 2.20%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	15 acres @ 0.23%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Several dispersed camping locations are located in the inventory area, primarily on Flat Ridge.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None

Improvement Type	Extent of Departures (acres)
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is bordered by private land and Utah Division of Wildlife lands on the northern boundary and Bureau of Land Management lands on the southern boundary.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	6,298 acres @ 99.96%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is partially bordered by private lands on the northern boundary.

Describe the general topography of the area in context of sight, sound, and screening
The terrain consists of south to north trending ridge and canyon bottom topography. Ridges, canyon bottoms, and stream courses generally descend in a northerly direction from Reservation Ridge. Ridgelines are broad and somewhat rounded or flat and are interrupted as irregular intervals by steep shale knolls. Intervening canyons are moderately wide with moderately steep side slopes.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occurs within the inventory area, mainly along the south to north trending ridgelines.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 0 acres (Semi-Primitive non-motorized) @ 0% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west, the Ashley National Forest to the north and the Manti-La Sal National Forest to the south.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0 acres @ 0%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	0 acres @ 0%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been a limited number of historic and prehistoric surveys in the inventory area. No eligible sites have been found.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes portions of one watershed, Mill Hollow – West Fork Avintaquin, it has a watershed condition class of functioning properly.

The inventory area is part of the Central Utah WCD – Duchesne Valley and Green River City watersheds.

The area includes the headwaters of Avintaquin Creek which contain a population of Colorado River Cutthroat trout.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The area is of irregular shape with 4 cherry stemmed routes into it. The inventory area boundaries are defined by roads on the south, east, and western boundaries and partially by a road and the Forest boundary on the north.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The inventory area borders the Uinta Wasatch-Cache National Forest to the west. On the eastern border the inventory area is adjacent to private and the Horse Ridge Wildlife Management Area. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	30% MA d (High Forage Production and Livestock Utilization); 1% MA e (Wildlife Habitat Emphasis); 24% MA f (Dispersed Recreation Roaded); 45% MA n (Range of resources uses and outputs)
Acres and % total of wildland urban interface in the area.	6,284 acres @ 99.74%
Type and extent of management restrictions within the area.	99.5% of the inventory area is Inventoried Roadless Area.

Mt. Lena – 517

Total acres: 34,114

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation within the inventory area consists of 7% Alder-leaf mountain mahogany, 4% Douglas fir, 1% Fringed Sagebrush, 7% Lodgepole Pine, 2% Meadow grasses and forbs, 54% Mixed Conifer, 5% Mountain Big Sagebrush, 2% Riparian Non-willow Shrub, 1% Persistent Aspen, 11% Ponderosa Pine, 7% Seral Aspen, and less than 1% Black Sagebrush, and Riparian Conifers.

In the far northern portion of the inventory area the vegetative cover consists of Ponderosa pine and bitterbrush, mountain big sagebrush, and grasses in the understory. The mixed conifer in the north and central portion of the inventory area is composed of subalpine fir and spruce, with a lodgepole pine over story. On the southern slopes of Mt Lena, the vegetative cover is lodgepole pine in the upper Pothole Creek drainage. Moving down in elevation the vegetative cover Seral Aspen and Alder Leaf Mountain Mahogany with Mountain Big Sagebrush at the lowest elevations of southern slopes of Mt Lena.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Greater Sage Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, and Wild Turkey.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.83%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The Ponderosa pine communities have a fire regime of 1 and condition class of 2. The mixed conifer communities in the north part of the inventory area have a fire regime of 4 and a condition class of 2. The mixed conifer communities in east central part of the inventory area have a fire regime of 3 and condition class of 1. The mixed conifer communities in the central part of the inventory area have a fire regime of 3

and condition class of 1. The mountain brush communities have a fire regime of 1 and a condition class of 2. The Mountain Big Sagebrush communities have a fire regime of 1 and a condition class of 2.

There have been single tree selection timber harvests in the inventory area. These occurred in the northwest corner of the inventory area and along the East Draw and Pothole roads in the late 1970s and early 1980s. Pre-commercial thinning occurred in 2010 along the East Draw road.

Parts of the northern part of the inventory area was burned by the Mustang Ridge Wildfire in 2002.

There are seven Forest Service system roads cherry stemmed into the inventory area. There are numerous unauthorized routes. The majority of which occur on the south end of the inventory area. There are two trails open to 50-inch vehicles or less in the inventory area, #0003, #0004, and #0008. There are three trails open to all vehicles in the inventory area, #0135, #0122, and 0062.

The inventory area contains parts of 8 range allotments, Diamond Mountain, Lena Peak, Pot Creek, Bowden Draw, McKee Draw, Davenport, Little Davenport, and Birch Creek/Little Hole. There are numerous spring developments, stock ponds, troughs, and reservoirs, pipelines, and fences, primarily on the south side of the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	431 acres @ 1.26%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	4.90 acres
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	59 acres @ 0.17%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Dispersed camping locations are numerous. They primarily occur on the east and south sides of the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None

Improvement Type	Extent of Departures (acres)
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The Limber Flag Yurt is surrounded by the inventory area. The Greendale East Campground is adjacent to the inventory area. The Limestone Mine is surrounded by the inventory area.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	34,097 acres @ 99.95%
Area and % total available for winter non-motorized opportunity	490 acres @ 1.44%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is adjacent to the private lands on the eastern boundary. United States Highway 191 is on average ½ miles away from the western boundary.

Describe the general topography of the area in context of sight, sound, and screening
The topography in the inventory area includes plateau lands, rolling upland plans, moderate sloping to very steep slopes along ridges, and shallow drainage ways.

Along the western boundary, the terrain is comprised of flat to gently rolling plateaus cut by a few, widely spaced, shallow drainage ways, and the open meadow areas, Bowden and Greens Draws. Along the eastern boundary the terrain consists of gently rolling lands. The inventory area includes Limber Flag summit and Mount Lena is the southern portion. The ridge line between Limber Flag and Mount Lena primarily run north to south and has moderately steep to steep slopes.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, fishing, horseback riding, cross country skiing, and snowshoeing occur throughout the inventory area.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 14,128 acres (Semi-Primitive non-motorized) @ 41.41% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0.01% @ 5 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors on the western and eastern boundaries disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	288 acres @ 1.72%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	52 acres @ 0.15%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Some eligible historic sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of five watersheds, Cart Creek has a watershed condition class of functioning at risk, Pine Creek – Green River has a watershed condition class of functioning at risk, Matt Warner Reservoir has a watershed condition class of functioning properly, Reader Creek has a watershed condition class of functioning properly, and Willow Creek Draw – Diamond Gulch has a watershed condition class of functioning properly.

The inventory area is part of the Dutch John Town, Deseret Generation and Transmission Co-op, and Green River City municipal water systems.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is primarily blocky. The inventory area boundaries are not tied to any geographic location and is difficult to identify from the surrounding areas not included in the inventory.
Describe if there are any legally established rights or uses within the area.	None
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The Daggett County General 2017 Resource Management Plan states; "Wilderness designation is not an appropriate, effective, efficient, economic or wise use of land. These lands can be adequately protected with existing management options", and the 2017 Uintah County Resource Management Plan states "The County does not support designation of additional areas within the County as federally designated Wilderness".
Describe the management of adjacent lands.	The Ashley National Forest adjacent to the inventory area are managed for multiple use. The private lands adjacent to the inventory area on the eastern boundary are primarily managed as rangelands.
Describe the current management of the area.	2% MA b (Moderate Timber Production); 40% MA f (Dispersed Recreation Roaded); 1% MA g (Undeveloped Dispersed Recreation – Unroaded); 54% MA n (Range of Resource Uses and Outputs); 2% MA n1 (NRA existing situation). A portion of the inventory area in the northwest corner is part of the Flaming Gorge National Recreation Area
Acres and % total of wildland urban interface in the area.	25,584 acres @ 75.00%
Type and extent of management restrictions within the area.	99.5% of the inventory area is Inventoried Roadless Area.

North Slope East Uintas – 530

Total acres: 66,791

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 2% Alpine, 18% Engelmann Spruce, 1% Fell-field, 14% Lodgepole Pine, 1% Low willow, 1% Meadow grasses and forbs, 48% Mixed Conifer, 5% Ponderosa Pine, 6% Rock, 2% Seral Aspen, and less than 1% of Douglas fir, Grass, Mountain Big Sagebrush, Subalpine fir, Tall Willow, and Willow.

The vegetative cover of the western part of inventory area consists of cirques and lakes and wet meadows between high elevation "bollie" ridge tops descending to the lower drainages. The vegetative cover in the drainages consists of mixed dense conifer forests of Engelmann spruce, lodgepole pine, and subalpine fir. Standing water is common and riparian communities are dominant, with lodgepole and spruce fir tree cover and wet understory vegetation. There are numerous small potholes with sedges as the dominant species. Narrow stringers of we meadows exist throughout the lower portion of the drainages that are dominated by grasses and sedges. Above the potholes and wet swales, the plant communities consist of a dense overstory of lodgepole pine, Engelmann spruce and subalpine fir between the meadow areas.

The vegetation in the eastern part of the inventory area consists of north facing steep slopes covered by lodgepole pine with aspen stands in rock places and stands of subalpine fir in isolated areas. Along the northern inventory area boundary east of the main Cart Creek drainage aspen is frequently present and lodgepole pine is predominant, near the Greendale Plateau ponderosa pine is common. Along the northern inventory area boundary west of the main Cart Creek drainage consists of mixed conifer, aspen, willow, birch, and alder vegetation interspersed with wet meadows with a variety of forbs, grasses, and sedges.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Greater Sage Grouse, Moose, Mountain Goat, Mule Deer, Elk, Ruffed Grouse, Snowshoe Hare, and Whitetailed Ptarmigan.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.59%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mixed conifer communities in the west and central part of the inventory area have a fire regime of 3 and condition class of 2. The mixed conifer communities in the east part of the inventory area have a fire regime of 4 and condition class of 2. The lodgepole pine communities through much of the inventory area have a fire regime 4 and condition class of 2. The lodgepole pine communities in the headwaters of Deep Creek have a fire regime of 1 and condition class of 3. The Ponderosa pine communities have a fire regime of 5 and condition class of 2.

Wildfires have burned parts of the inventory area, mainly in the north central part of the inventory area. These wildfires occurred in 1978, 1985, 2005, and 2006. A salvage harvest occurred in 1979 in interior of the Campbell Draw wildfire which occurred in 1978.

Small clear cuts occurred in the south-central part of the inventory area in 1970. Precommercial thinning and individual tree selection harvests have been done along the north central part of the inventory area in the primarily in the 1980s

There are six Forest Service system roads cherry stemmed into the inventory area. There are some unauthorized routes in the inventory area. The majority of which occur on the north end of the inventory area. There are four trails open to 50-inch vehicles or less in the inventory area, #1016, #1013, #1014, and #1014A.

The inventory area contains parts of six range allotments, Hickerson Park, Commissary Park, Sheep Creek Park, Sheep Creek Mountain, Lonesome Park, and Lewis/Allen. There are multiple range fences in the inventory area. No other range improvements are within the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	2,994 acres @ 4.48%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	115 acres @ 0.17%
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None

Improvement Type	Extent of Departures (acres)
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	8 acres @ 0.01%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are dispersed camping spots scattered throughout the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is adjacent to the Spirit Lake Recreation Area and Browne Lake Campground.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	66,772 acres @ 99.97%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
Small parts of the northern boundary are adjacent to State Highway 44.

Describe the general topography of the area in context of sight, sound, and screening
The western portion of the inventory area contains high glaciated ridgelines separating cirque basins descending into broad forested tops and interspersed pothole areas. The eastern portion of the inventory area contains steep scarp north facing slopes descending into wet stream bottomlands, flood plains, and lower terraces with marshes and meadows.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, backpacking, camping, hiking, hunting, fishing, and horseback riding are popular in the inventory area. These activities primarily occur in the western side of the inventory area where there are multiple access trails.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	9,867 acres (Primitive); 40,933 acres (Semi-Primitive non-motorized) @ 76.06% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	19% @ 12,714 acres
Acres of fens and ground water dependent ecosystems	0.5% @ 319 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	47.1% @ 31,446 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are peaks in the southwestern part of the inventory area. Cirque basins and associated lakes are within the southwestern part of the inventory area. There are many lakes within the central part of the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	14,785 acres @ 22.14%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	144 acres @ 0.22%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Some eligible prehistoric sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of seven watersheds, Upper Sheep Creek has a watershed condition class of functioning at risk, Middle Sheep Creek has a watershed condition class of functioning at risk, Beaver Creek has a watershed condition class of functioning at risk, Upper Carter Creek has a watershed condition class of functioning properly, Middle Carter Creek has a watershed condition class of

functioning properly, Lower Carter Creek has a watershed condition class of functioning at risk, and Skull Creek – Green River has a watershed condition class of functioning at risk.

The inventory area is part of the Dutch John Town municipal water system.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
The inventory area includes most of the Pollen Lake Research Natural Area. The Pollen Lake Research Natural Area was established in 1987 for the features of subalpine fir and Engelmann spruce forest and krummholz; alpine turf communities on shallow rocky soil, lake and wetlands in a cirque basin, and rare plants.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	1,134 acres @ 1.70%

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is very irregular. The inventory area borders on the east, north, west, and part of the south are not tied to geographic locations and it is difficult to distinguish between the inventory area and lands not included in the inventory.
Describe if there are any legally established rights or uses within the area.	There are five ditch bill easements surrounded by the inventory area. They are Carter Creek Canal and service road, Teepee Lakes Pipeline and Dam, Highline Canal, and Highline Canal Overflow Ditch
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The Daggett County General 2017 Resource Management Plan states; "Wilderness designation is not an appropriate, effective, efficient, economic or wise use of land. These lands can be adequately protected with existing management options".
Describe the management of adjacent lands.	The inventory area is adjacent to the Uinta-Wasatch-Cache National Forest to the west, including the High Uintas Wilderness. The remaining adjacent lands are Ashley National Forest lands. The High Uintas Wilderness is managed according to the 1984 Utah Wilderness Act. The non-wilderness lands National Forest lands are managed for multiple use.

Measures for 4a	Outcome
Describe the current management of the area.	2% MA a (Research Natural Area Candidates); 13% MA f (Dispersed Recreation Roaded); 37% MA g (Undeveloped Dispersed Recreation – Unroaded); 48% MA n (Range of Resources Uses and Outputs)
Acres and % total of wildland urban interface in the area.	66,747 acres @ 99.93%
Type and extent of management restrictions within the area.	89.6% of the inventory area is Inventoried Roadless Area.

Nutters Canyon – 184

Total acres: 6,642

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 3% Basin Big Sagebrush, 5% Black Sagebrush, 2% Greasewood, 23% Mountain Big Sagebrush, 4% Persistent Aspen, 62% Pinyon – juniper, and less than 1% of Serviceberry and Grass.

The vegetation in the central and northern portions of the inventory area consists of moderately dense pinyon pine and juniper and substantial patchy areas of perennial grasses and mountain mahogany intermixed with pinyon pine and juniper areas.

The southern portion of the area has sparse grass and sagebrush and/or pinyon pine, juniper and some Douglas fir as well as bare soil.

The area provides habitat for a variety of wildlife including Bandtailed Pigeons, Black Bear, Blue Grouse, Mule Deer, Pronghorn, Elk, and Greater Sage Grouse.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	98.97%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to the buried pipeline disturbed area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mountain big sagebrush communities in this inventory polygon have a fire regime of 1, and a condition class of 2. The pinyon juniper communities have a fire regime of 1 and a condition class of 2.

There have been no wildfires in the in the past 60 years. A small area, 16 acres, of the inventory area was burned in 2007 for a sage grouse habitat burn study. Portions of the inventory area were cleared of pinyon pine-juniper in the past, these areas have been excluded from the inventory but are surrounded by the inventory area.

There is one Forest Service System road cherry stemmed into the inventory area. Several unclassified roads proved access to spring developments or stock ponds. Several unauthorized routes exist, primarily in the southern half of the inventory area.

The inventory area has portions of two range allotments, Sowers Canyon and Anthro Mountain. There are five other range fences as well as multiple range spring developments, troughs, and reservoirs and a buried range pipeline. There is a boundary fence on the forest on the northern boundary that marks the border between the Ashley National Forest and the Uintah and Ouray Indian Reservation.

Four active oil and gas well pads in the northern portion of the area are cherry stemmed out of the inventory area. There are five planned well pads with associated planned pipelines that have been cherry stemmed out the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	16 acres @ 0.25%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	64 acres @ 0.97%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	One dispersed camping area along Nutters Ridge Road has compacted soil and disturbed vegetation.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None

Improvement Type	Extent of Departures (acres)
Lands adjacent to development or activities that impact opportunities for solitude.	To the west and north of the area there are active oil and gas activities on both the Ashley National Forest and the Uintah and Ouray Indian Reservation.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	6,642 acres @ 100%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
The northern boundary, which is the northern boundary of the Forest, is immediately adjacent to the Uintah and Ouray Indian Reservation lands. The southern boundary of the inventory area is Forest Service System Road #10164, which it from Ashley National Forest lands not included in the inventory. The eastern boundary is Forest Service System Road 335, which separates the inventory area from the Alkali Canyon inventory area. The western boundary is adjacent to the Wire Fence inventory area and Ashley National Forest lands not included in the inventory and is separated by Forest Service System Road #10333.

Describe the general topography of the area in context of sight, sound, and screening
The main terrain feature in the inventory area is the ridgeline that runs down the center of the area from north to south. Pinyon pine and juniper covers the ridgeline and hill sides.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, horseback riding, occur with the inventory area, mainly along the western and eastern boundaries of the inventory area where road access exists. Very few primitive recreation activities occur in most of the inventory area, because of the lack of attractions and access routes.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 0 acres (Semi-Primitive non-motorized) @ 0% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors on the western, eastern, and southern boundaries disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0 acres @ 0%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	0 acres @ 0%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
Ute Indian horse corral complexes are present as well as numerous prehistoric sites (rock art, rock shelters, lithic scatters, and habitation sites).

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area is within the Nutters Canyon watershed. Nutters Canyon has a watershed condition class of functioning.

Nutters Canyon is part of the Green River City municipal watershed.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no known special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The shape is irregular, long and narrow and has multiple areas excluded inside the area boundary. The inventory area is bounded by roads on west, east, and south and by the Forest boundary to the north.
Describe if there are any legally established rights or uses within the area.	There are portions of 7 oil and gas leases in the area. Five are active and 2 are inactive. The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	Bureau of Land Management are managed for multiple use. Uintah and Ouray Indian Reservation lands are managed for multiple use and there is significant oil and gas development. The adjacent Ashley National Forest lands are managed for multiple use with oil and gas developments adjacent to the inventory area on the northwest.
Describe the current management of the area.	31% MA d (High Forage Production and Livestock Utilization); 14% MA e (Wildlife Habitat Emphasis); 2% MA f (Dispersed Recreation Roaded); 53% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	2,770 acres @ 41.70%
Type and extent of management restrictions within the area.	84.6% of the inventory area is Inventoried Roadless Area.

Pole Creek – 384

Total acres: 13,207

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 1% Alpine, 2% Engelmann Spruce, 14% Mixed Conifer, 6% Mountain Brush, 25% Mountain Big Sagebrush, 11% Persistent Aspen, 7% Pinyon – juniper, 2% Ponderosa Pine, 30% Seral Aspen, and less than 1% Alpine vegetation, Cottonwood, Lodgepole Pine, Meadow grasses and forbs, Sagebrush, and Serviceberry.

The vegetative cover in the northern portion of the inventory area includes seral lodgepole pine overstory and small amounts of Douglas fir and aspen. In the Pole Creek Canyon area, Engelmann spruce, lodgepole pine, and Douglas fir and aspen are the dominate overstory with inclusions of subalpine fir. In the Dark Canyon and First Canyon areas the vegetative cover is mixed mountain shrub and grass with lodgepole pine and Douglas fir on intervening side slopes and ridges. At the lower end of the canyons the vegetation is dominated by mountain brush, sagebrush, and grass communities. In the southern portion of the inventory area Ponderosa pine and manzanita cover the lower south facing slopes with aspen in the drainage ways. The lower south facing slopes have a cover of mountain brush with sagebrush and grass.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Greater Sage Grouse, Moose, Mule Deer, Elk, Ruffed Grouse, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.90%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. Weeds are limited to roads in the inventory area.

<u>Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.</u>
The mixed conifer communities have a fire regime of 3 and condition class of 2. The mountain brush communities have a fire regime of 1 and condition class of 2. The pinyon-juniper have a fire regime of 1 and condition class of 1 and fire regime of 1 and condition class of 2.

The Neola North fire burned through much of the inventory area in 2007.

Multiple individual tree selection harvests were completed, the majority in the 1950s and 1960s, and the latest occurring in 1991. Three stand clear cuts were done in 1958, 1968, and 1970. These occurred west of the Pole Creek Cave and east of Pole Creek Lake. One small pre-commercial thinning project was completed in the 1995.

There are three Forest Service system roads cherry stemmed into the inventory area. One Forest Service system trail #1117, trail open to all vehicles is within the inventory area. There are multiple unauthorized routes scattered throughout the inventory area.

The inventory area contains parts of two grazing allotments; Pole Creek and Farm Creek. There are multiple spring developments, stock ponds and troughs, fences, and pipelines primarily in the southern part of the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	121 acres @ 0.91%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	177 acres @ 1.34%
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	115 acres @ 0.87%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are dispersed camping locations along the Elkhorn Loop Road on the west and east sides of the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared rights-of-way, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None

Improvement Type	Extent of Departures (acres)
Lands adjacent to development or activities that impact opportunities for solitude.	The Uintah and Ouray Indian Reservation is adjacent to the inventory area. The Pole Creek Campground is adjacent to the north side of the inventory area.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	13,206 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	5,042 acres @ 38.17%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is adjacent to the Uintah and Ouray Indian Reservation.

Describe the general topography of the area in context of sight, sound, and screening
The topography ranges from gentle to moderately steep. The terrain north of Pole Creek Canyon consists of rough, boulder covered shoulders to steep pitches. Pole Creek Canyon has steep canyon side slopes extending from the ridge top to Pole Creek. The side slopes of Pole Mountain consist of steep escarpments of sandy and boulder lateral moraines. The southern portion of the inventory area is broad open south facing slopes intercut with open drainage ways.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, fishing, and horseback riding occur within the inventory area, primarily around Pole Creek Lake and the meadows south of Pole Creek Lake.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 5,352 acres (Semi-Primitive non-motorized) @ 40.52% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0.06% @ 8 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	3.3% @ 434 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	10,015 acres @ 75.84%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	0 acres @ 0%

Measure for 3b: Description of any unique geologic features in the area.

The Pole Creek Cave and Pole Creek Sinks are located within the inventory area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been minimal historic and prehistoric surveys in the area. No eligible sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of three watersheds, Pole Creek has a watershed condition class of functioning at risk, Cart Hollow – Uinta River has a watershed condition class of functioning properly, and Hominy Creek – Farm Creek has a watershed condition class of functioning properly.

The inventory area is part of the Green River City municipal water system.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no scientific or education features in the inventory area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is irregular, long and narrow. The inventory area southern boundary is the Uintah and Ouray Indian Reservation. The west, east, and north boundaries are partially identified by roads. The other east and west boundaries are not tied to geographic locations and are difficult to identify from the areas not included in the inventory.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The inventory area is adjacent to the Uintah and Ouray Indian Reservation lands. These lands are primarily undeveloped. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	25% MA e (Wildlife Habitat Emphasis); 17% MA f (Dispersed Recreation Roaded); 4% MA g (Undeveloped Dispersed Recreation – Unroaded); 2% MA k (Maximum Water Yield Recreation); 52% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	1,767 acres @ 13.38%
Type and extent of management restrictions within the area.	88.6% of the inventory area is Inventoried Roadless Area.

Right Fork Indian Canyon – 183

Total acres: 46,310

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 2% Basin Big Sagebrush, 21% Douglas fir, 7% Grass, 3% Mixed Conifer, 13% Mountain Brush, 13% Mountain Big Sagebrush, 1% Persistent Aspen, 29% Pinyon – juniper, 1% Ponderosa Pine, 9% Seral Aspen, 1% Subalpine fir, and less than 1% Alder-leaf mountain mahogany, Rubber Rabbitbrush, Serviceberry, Spiked Big Sagebrush, and Tall Willow.

The steep north facing slopes in Reserve Canyon are usually covered with Douglas fir and pinyon pine-juniper, but no aspen. The upper portions of slopes are less steep and support shrub vegetation of mountain mahogany, bitterbrush, and sage. The steepest south facing slopes have grass and some shrub vegetation.

The drainage ways immediately north of Reservation Ridge have tree cover of Douglas-fir and mixed coniferous forest stands with and without serval aspen. Perennial grasses and other herbaceous species are abundant of the steeper slopes of south aspects.

In the South Fork Avintaquin Creek north facing slope are usual covered with Douglas fir and pinyon pine-juniper, but no aspen. Upper portions of slopes are less steep and support a shrub vegetation of mountain mahogany, bitterbrush, and sage. The steepest south facing slopes have grass and some shrub vegetation. At the lower end of the drainage the hilly topography has a cover of sagebrush and perennial grasses.

Left and Right Forks of Lake Canyon, Wilbur Canyon, and Right Fork Indian Canyon have Douglas fir and aspen on the higher elevation north faceting slope and sparse pinyon pine and Douglas fir on south facing slopes. At the mid to upper elevation side slope have a cover of moderately dense pinyon pine and juniper. The lower slopes have sparse pinyon pine-Douglas Fir or perennial grass-sagebrush-mountain mahogany. The canyon bottoms have a vegetative cover of sagebrush, rabbit brush, grass and willows along creeks, and with grass and sagebrush on alluvial fans.

The Left Fork Indian creek has sparse pinyon pine-Douglas fir-juniper on the south to west aspects and dense pinyon pine-Douglas fir or perennial grass-sagebrush-mountain mahogany on the north to east aspects. The lower end (north end) of the canyon has sparse scattered pinyon pine and juniper and perennial grasses.

The inventory area provides habitat for two endemic plants, Erigeron untermannii, Indian Canyon fleabane, and Mentezelia goodrichi, Goodrich's blazingstar.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%

Measures for 1a and 1b	Outcome
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	97.72%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited to roads corridors in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The pinyon-juniper communities in the Left Fork and Right Fork of Lake Canyon have a fire regime of 1 and condition class of 2. The pinyon-juniper communities in the remainder of the inventory area have a fire regime of 3 and a condition class of 2. The mountain brush communities have a fire regime of 2 and condition class of 2. The Douglas fir communities have a fire regime of 1 and condition class of 3. The mixed conifer communities have a fire regime of 3 and a condition class of 3.

The Lake Canyon wildfire in 2012 burned 85 acres, the Six Mile wildfire burned 1,950 acres in 1989, and the Six Mile Creek wildfire burned 17 acres in 1981.

There has been a small amount of vegetation treatments in the inventory area, 594 acres of single tree selection harvests.

There are 13 Forest Service System roads cherry stemmed into the inventory area, the longest being 5 miles. Unauthorized routes exist in the canyon bottoms and lead to dispersed camping locations.

The inventory area contains all or portions of six range allotments, Horse Ridge, Wilbur Bench, Lake Canyon, Right Fork Indian Canyon, Left Fork Indian Canyon, and Mill Hollow. There are many spring developments, stock ponds and troughs, pipelines, and fences within the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	594 acres @ 1.28%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	0
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	4.31 acres

Improvement Type	Extent of Departures (acres)
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	174 acres @ 0.38%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Dispersed camping locations exist, primarily located in canyon bottoms.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared rights-of-way, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	Ditches have been cut in the alluvial fans along State Highway 191.
Lands adjacent to development or activities that impact opportunities for solitude.	The eastern boundary of the inventory area is State Highway 191.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	46,308 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads

State Highway 191 forms the eastern border of the inventory area. The inventory area borders a private inholding in the Left Fork of Indian Canyon and private inholdings in Right Fork of Indian Canyon. There one private inholding in Bear Gulch surrounded by the inventory area. Private lands are adjacent to the inventory area on the north and southern boundaries.

Describe the general topography of the area in context of sight, sound, and screening

The terrain consists of south to north trending ridge and canyon bottom topography. Ridges, canyon bottoms, and steam courses generally descend in northerly direction from Reservation Ridge along the southern boundary and from Left Fork Indian Creek along the eastern boundary. Ridge lines are generally narrow, and intervening canyons are broad with moderately steep to very steep side slopes. The terrain along Reservation Ridge is dissected by numerous minor drainages, including the upper headwaters of Reserve Canyon and South Fork Avintaquin Creek.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
This area offers primitive recreation opportunities including camping, fishing, hunting, hiking, and horseback riding. The primitive recreation activities mainly occur along the southern boundary of the area, and in the canyon bottoms of Grass Hollow, Right Fork Indian Creek, and the Left and Right Forks of Lake Canyon.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 14,648 acres (Semi-Primitive non-motorized) @ 31.63% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	56 acres @ 0.12%

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west, the Ashley National Forest to the north and the Manti-La Sal National Forest to the south.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
Grey Head Peak is in the head of Right Fork Indian Canyon and has an elevation of 9,496 feet.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0 acres @ 0%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	56 acres @ 0.12%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area

Question 3c: Is there historic or cultural resources of historic value in the area?
Few surveys for historic and prehistoric sites have been completed, some eligible prehistoric sites were found.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes portion of five watersheds. Four of the watersheds, Left Fork Indian Canyon, Right Fork Indian Canyon, Lake Canyon, and Finger Canyon – Avintaquin have a watershed condition class of functioning at risk. South Fork Avintaquin has a watershed condition class of functioning properly.

The inventory area contains parts of the Central Utah WCD – Duchesne Valley and Green River City watersheds.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The areas shape is irregular. Thirteen authorized roads are cherry stemmed into the inventory area. The area boundaries are primarily tied to roads on the west, east, and south sides. The boundary on the north in the Forest boundary.
Describe if there are any legally established rights or uses within the area.	There is a portion of one active oil and gas lease in the far northeastern corner of the area. The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"

Measures for 4a	Outcome
Describe the management of adjacent lands.	The inventory area is adjacent to the Lake Canyon Wildlife Management Area, Tribal, and private lands to the north, the Horse Ridge Wildlife Management Area to the north and west, and private, BLM, and state trust lands to the south. The lands on the northern boundary are primarily undeveloped. There are oil and gas developments adjacent to the northeastern corner of the inventory area. The lands on the southern boundary are primarily undeveloped, except for some private residences adjacent to the southeast corner of the inventory area. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	29% MA d (High Forage Production and Livestock Utilization); 1% MA e (Wildlife Habitat Emphasis); 12% MA f (Dispersed Recreation Roaded); 58% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	36,380 acres @ 78.56%
Type and extent of management restrictions within the area.	99.7% of the inventory area is Inventoried Roadless Area.

Sheep Creek East – 562

Total acres: 7,579

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory are consists of 25% Alder-leaf Mountain Mahogany, 22% Black Sagebrush, 1% Cottonwood, 2% Curl-leaf Mountain Mahogany, 9% Douglas fir, 1% Fringed Sagebrush, 1% Mountain Brush, 14% Mountain Big Sagebrush, 20% Pinyon – juniper, 2% Wyoming Big Sagebrush, and less than 1% Desert Shrub, Little-leaf Mountain Mahogany, Persistent Aspen, Sagebrush, and Seral Aspen.

The vegetative cover includes sagebrush and grass on the north facing slopes of Sheep Creek Canyon, scattered ponderosa pine and grass understory above Sheep Creek, and mountain bush and small stands of Douglas fir and pinyon and juniper within Death Valley Canyon.

The area provides habitat for a variety of wildlife including Bandtailed Pigeons, Black Bear, Blue Grouse, Chukar, Moose, Mule Deer, Pronghorn, Elk, Ruffed Grouse, Snowshoe Hare, and Wild Turkey.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	97.83%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. Weeds are limited to roads in the inventory area.

<u>Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.</u>
The lodgepole pine communities have a fire regime of 4 and condition class of 2. The pinyon – juniper conifer communities have a fire regime of 5 and condition class of 2. The Douglas fir communities have a fire regime of 1 and condition class of 3. The mountain brush communities have a fire regime of 1 and condition class of 2.

There have been six regeneration harvest individual tree selection cuts in the 1980s. A small salvage cut was completed in 2013.

Multiple unauthorized routes exist in the inventory area. The majority are found in the western and southern parts of the inventory area leading off from the Death Valley road.

The inventory area contains a part of the Sheep Creek Mountain grazing allotment. There are 2 spring developments, 2 stock troughs, one stock pond, three wildlife guzzlers, one pipeline, 2 range fences, and one enclosure.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	40 acres @ 0.53%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	20 acres @ 0.26%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are few dispersed camping locations in the inventory area. These are on the south end of the inventory area below Windy Ridge
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The Sheep Creek Canyon corridor is adjacent to the inventory area
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	7,579 acres @ 100%
Area and % total available for winter non-motorized opportunity	7,112 acres @ 93.83%

Describe the proximity to private lands and non-Forest Service roads
Private lands are adjacent to the inventory area on the northeast. A private residence, outbuildings, and agricultural lands are located on these private lands. The inventory area is adjacent to State Highway 44 on portions of the north and eastern sides.

Describe the general topography of the area in context of sight, sound, and screening
The topography in the inventory area includes the north and west facing slopes of Sheep Creek canyon along the northern border. These slopes are moderately to very steep. Death Valley Canyon is sharply incised from the broad plateau which spans most of the area. Windy Ridge forms the southern boundary of the plateau and steeply drops into the Hope Creek drainage.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occur within the inventory area, primarily along the Death Valley Road.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 0 acres (Semi-Primitive non-motorized) @ 0% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Road corridors on the western, eastern, and northern boundaries disrupt wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
The Sheep Creek Canyon Geologic area is partially located in the inventory area

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	7,578 acres @ 99.99%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	120 acres @ 1.59%

Measure for 3b: Description of any unique geologic features in the area.

The Sheep Creek Canyon Geologic area includes the Uinta Crest Fault, a section of folded and twisted rock that reveals millions of years of geologic history.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Some eligible prehistoric sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of two watersheds, Lower Sheep Creek has a watershed condition class of functioning at risk and Middle Sheep Creek has a watershed condition class of functioning at risk.

The inventory area is part of the Dutch John Town municipal water system.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
The inventory area contains a portion of the Sheep Creek Canyon Geologic Area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	1,035 acres @ 13.65%

Question 3f: Are there any scientific or education features in the area?
The Sheep Creek Canyon Geological Area offers opportunities for geological education.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area has two cherry stemmed roads into its interior. The majority of the boundary of the inventory area is formed by roads. Part of the northern boundary is not tied to a geographic location and is difficult to identify from the private lands adjacent.
Describe if there are any legally established rights or uses within the area.	None
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The Daggett County General 2017 Resource Management Plan states; “Wilderness designation is not an appropriate, effective, efficient, economic or wise use of land. These lands can be adequately protected with existing management options”.

Measures for 4a	Outcome
Describe the management of adjacent lands.	The Ashley National Forest lands adjacent to the inventory area to the east, and part of the north and south boundaries are designated as the Flaming Gorge National Recreation Area. The adjacent Ashley National Forest lands are managed for multiple use. The inventory area is adjacent to private lands on part of the northern border. State trust lands also border part of the northern border and are managed as rangelands
Describe the current management of the area.	16% MA e (Wildlife Habitat Emphasis); 57% MA f (Dispersed Recreation Roaded); 10% MA n (Range of Resource Uses and Outputs); 4% MA n1 (NRA existing situation); 13% MA r (Wildlife). The eastern portion of the inventory area is within the Flaming Gorge National Recreation Area.
Acres and % total of wildland urban interface in the area.	7,578 acres @ 99.99%
Type and extent of management restrictions within the area.	93.4% of the inventory area is Inventoried Roadless Area.

Sheep Creek West – 574

Total acres: 7,382

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 18% Alder-leaf mountain mahogany, 9% Black Sagebrush, 4% Curl-leaf Mountain Mahogany, 19% Douglas fir, 4% Mountain Brush, 2% Mountain Big Sagebrush, 16% Pinyon – juniper, 9% Seral Aspen, and less than 1% of 5-needle Pine, Cottonwood, Juniper, Lodgepole Pine, and Persistent Aspen.

The vegetation in the lower elevations on the north edge of the inventory area is sagebrush, grass, pinyon and juniper, and scattered ponderosa pine. Moving south and higher in elevation the ponderosa pine and pinyon and juniper transition to Douglas fir and some lodgepole pine. Limber pine is found on some of the direr ridgetop sites.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Chukar, Greater Sage Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, and Wild Turkey.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.56%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited to roads in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The lodgepole pine communities have a fire regime of 4 and condition class of 2. The pinyon – juniper conifer communities have a fire regime of 5 and condition class of 2. The Douglas fir communities have a fire regime of 1 and condition class of 3. The mountain brush communities have a fire regime of 1 and condition class of 2.

A small part of the southeastern part of the inventory area was burned in the Weyman Fire in 1985.

Broadcast burns were conducted in 2011 in the central and west central part of the inventory area.

Unauthorized routes exist in the inventory area. They are primarily found in the area northeast of Long Park Reservoir and in the central part of the inventory area, east of Sols Canyon.

The inventory area contains a part of the Sheep Creek Park grazing allotment. There are no stock improvements in the inventory area except for a fence on part of the northeastern boundary.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	1,068 acres @ 14.47%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	5 acres @ 0.7%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	None identified
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The private lands adjacent to the north of the inventory area are primarily undeveloped. The Sheep Creek Geologic Loop road is the eastern boundary of the inventory area.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	7,382 acres @ 100%
Area and % total available for winter non-motorized opportunity	6,601 acres @ 89.43%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is adjacent to private lands along portions of the northern border.

Describe the general topography of the area in context of sight, sound, and screening
The inventory area includes steep, rocky canyons and folded and faulted steep to very steep canyon side slopes and scarp slopes interspersed with mid elevation ridgelines.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, hiking, hunting, and horseback riding occur within the inventory area, but are limited because of access.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 5,742 acres (Semi-Primitive non-motorized) @ 77.79% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between parts of the Ashley National Forest and animals moving between the Bridger Teton National Forest and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
The folds and faults of the Sheep Creek Canyon Geologic Area are partially within the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	3,260 acres @ 44.17%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	188 acres @ 2.55%

Measure for 3b: Description of any unique geologic features in the area.

The inventory area contains part of the Sheep Creek Canyon Geologic Area and the Sheep Creek Cave and Sheep Creek Spring.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Some eligible prehistoric sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes parts of three watersheds, Lodgepole Creek has a watershed condition class of functioning at risk, Middle Sheep Creek has a watershed condition class of functioning at risk, and Lower Sheep Creek has a watershed condition class of functioning at risk.

The inventory area is part of the Dutch John Town municipal water system.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
The inventory area contains a portion of the Sheep Creek Canyon Geologic Area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	2,055 acres @ 27.84%

Question 3f: Are there any scientific or education features in the area?
The inventory area contains part of the Sheep Creek Canyon Geologic Area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is irregular. The area is boundary to the north in the Ashley National Forest boundary and to the east and west are roads. The southern boundary is not tied to a geographic location and is not distinguishable from the lands outside of the inventory.
Describe if there are any legally established rights or uses within the area.	None identified
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	The Daggett County General 2017 Resource Management Plan states; “Wilderness designation is not an appropriate, effective, efficient, economic or wise use of land. These lands can be adequately protected with existing management options”.

Measures for 4a	Outcome
Describe the management of adjacent lands.	The private and State Trust Lands adjacent to the northern boundary are mainly undeveloped and are managed as range lands. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	2% MA b (Moderate Timber Production); 28% MA e (Wildlife Habitat Emphasis); 14% MA f (Dispersed Recreation Roaded); 25% MA g (Undeveloped Dispersed Recreation – Unroaded); 31% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	7,376 acres @ 99.92%
Type and extent of management restrictions within the area.	94.0% of the inventory area is Inventoried Roadless Area.

South Fork Rock Creek – 320

Total acres: 8,925

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 47% Aspen, 2% Douglas fir,27% Engelmann Spruce, 2% Gambel Oak, 7% Lodgepole Pine, 13% Mixed Conifer, 1% Rock and less than 1% Mountain Brush and Subalpine fir.

The steep slopes in the inventory area around the South Fork of Rock Creek have a vegetative cover of Engelmann spruce and subalpine fir. The rolling uplands above the timberline include plane communities of Engelmann spruce, alpine sedge/grass and forbs, with inclusions of Krumholtz Engelmann spruce and subalpine fir. Cushion plant, geum sedge, and sedge-grass communities occur on the steep rocky slopes wherever pockets of soil have formed.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mountain Goat, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, and Whitetailed Ptarmigan.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.71%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	99.93%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited to roads in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The Engelmann spruce communities have a fire regime of 4 and condition class of 2. The mixed conifer communities in the western portion of the inventory area have a fire regime of 3 and a condition class of 3. The mixed conifer communities in the western part of the inventory are have a fire regime of 1 and a condition class of 2. The mountain brush communities have a fire regime of 2 and a condition class of 2.

There have been no identified wildfires in the area over the past 60 years.

Three regeneration harvest individual tree selection timber harvests were completed in 1966, 1999, and 2002. Four small stand clear cuts were done in 1975 along the Castle Rock road in the western side of the inventory area.

There are four Forest Service system roads cherry stemmed out of the inventory area. There are two trails open to all vehicles, #1215 and 1209, in the inventory area. A few unauthorized routes are present, primarily in the southeastern part of the inventory area.

The inventory area contains parts of four range allotments, Shale Creek, North Fork Duchesne, Blind Stream, and Rock Creek. There are no stock improvements in the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	**Extent of Departures (acres)**
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	None
Timber harvest areas where logging and prior road construction are not substantially noticeable.	5.28 acres @ 0.06%
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	None
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	The Splash Dam dispersed camping site is popular and is compacted soils and modified vegetation.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None

Improvement Type	Extent of Departures (acres)
Lands adjacent to development or activities that impact opportunities for solitude.	The Honeycomb and Amber Onyx calcite mines are patented mining claims that have been excluded from the inventory area but are surrounded by the inventory area. These mines are active.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	8,921 acres @ 99.96%
Area and % total available for winter non-motorized opportunity	30 acres @ 0.34%

Describe the proximity to private lands and non-Forest Service roads
There are no adjacent private lands or non-Forest Service roads.

Describe the general topography of the area in context of sight, sound, and screening
There terrain consists of moderate to very steep ridge sides above timberline that grade laterally to cliffs. The area includes East Grandaddy Mountain and the cirque basin where Arta Lake, Survey Lake and Carl Lake are located. The area to the south and southwest of this cirque basin is composed of elongated lateral moraines and broad tops separated by broad open troughs. The western slope descending into Hades Canyon contains steep slope and cliff faces, including Castle Rocks.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, fishing, and horseback riding occur within the inventory area. These activities occur mainly around Survey, Arta, and Carl Lakes and along the Headache Road #10171.

The cirque basin containing Survey Lake, Arta Lake, and Carl Lake are popular destinations for hiking and fishing.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	26 acres (Primitive); 5,000 acres (Semi-Primitive non-motorized) @ 56.32% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	52.4% @ 4,679 acres
Acres of fens and ground water dependent ecosystems	0.05% @ 4 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	61.6% @ 5,001 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
East Grandaddy Mountain at 11,659 feet overlooks Grandaddy Basin within the High Uintas Wilderness and the South Fork of Rock Creek drainage.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	6,069 acres % 68.00%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	185 acres @ 2.07%

Measure for 3b: Description of any unique geologic features in the area.

The Castle Rocks in the North Fork Duchesne drainage are dramatic steep rock formations.

Question 3c: Is there historic or cultural resources of historic value in the area?
Minimal surveys have been performed in the inventory area. One eligible prehistoric site has been identified within the inventory area.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area spans four watersheds. Hades Creek – Duchesne River has a watershed condition class of functioning at risk, Swift Creek – Duchesne River has a watershed condition class of functioning at properly, Blind Stream has a watershed condition class of functioning at risk, and South Fork Rock Creek has a watershed condition class of functioning at properly.

The inventory area is part of the Central Utah WCD - Duchesne Valley and Green River City municipal watersheds.

South Fork Rock Creek has a genetically pure population of Colorado River cutthroat trout.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas or research natural areas is the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0% @ 0 acres

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is irregular. It borders the High Uintas Wilderness to the north and northwest. The inventory area covers the south slope of East Grandaddy Mountain and the ridgeline between Hades Canyon and South Fork Rock Creek including Castle Rocks Hades Canyon. The inventory area boundaries are not tied to roads or distinguishable landmarks.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The inventory area is adjacent to the High Uintas Wilderness to the north and is surrounded by other Ashley National Forest lands to the south, west, and east. The High Uintas Wilderness is managed according to the 1984 Utah Wilderness Act. The non-wilderness Ashley National Forest lands are management for multiple use.
Describe the current management of the area.	1% MA f (Dispersed Recreation Roaded); 12% MA g (Undeveloped Dispersed Recreation – Unroaded); 87% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	None
Type and extent of management restrictions within the area.	94.7% of the inventory area is Inventoried Roadless Area.

South Slope East Uintas – 463

Total acres: 135,466

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 2% Alpine, 1% Douglas fir, 24% Engelmann Spruce, 13% Fell-field, 4% Lodgepole Pine, 2% Low Willow, 2% Meadow grasses and forbs, 24% Mixed Conifer, 1% Mountain Brush, 6% Mountain Big Sagebrush, 2% Persistent Aspen, 1% Pinyon – juniper, 11% Rock, 6% Seral Aspen, 1% Willow, and less than 1% Alder-leaf Mountain Mahogany, Black Sagebrush, Cottonwood, Maple, Ponderosa Pine, Serviceberry, Shale Semi-barrens, Subalpine Fir, Tall Willow, and Wyoming Big Sagebrush.

The plant communities in the inventory area vary widely by elevation. The high elevation boulder fields support little if any alpine vegetation. Vegetation cover on the rounded high elevation "bollies" consist of sedges, moss, dwarf clover, and other alpine vegetation. In the glacial high elevation valley bottoms vegetative cover consists of alpine moraine wet and dry meadows with sporadic tree cover. Sedges, grasses, and low growth willows such as plainleaf willow dominate the wet meadows and marsh marigold and elephant head are common forbs in these wet areas. The dry meadows include sedges and grasses. The alpine moraine forested areas include lodgepole pine, Engelmann spruce, and subalpine fire.

The lower elevation glacial valley bottoms east of the Uinta River have a dense forest cover of lodgepole pine, Engelmann spruce, and subalpine fir. Within the Whiterocks River drainage the tree overstory occurs on most of the area with minor inclusions of mixed mountain shrub. Engelmann spruce, lodgepole pine and Douglas fir-aspen is the dominant overstory with inclusion of subalpine fir.

Along the Middle and Lower Dry Fork, plant communities are variable and highly diverse. A Douglas fir and Oregon grape habitat occurs on the limestone derived soils; while at the upper portion lodgepole pine and grouse whortleberry plan communities occur. An aspen, narrow leaf cottonwood, snowberry community dominates the vegetative cover in the lower canyon bottoms. A blue spruce/grass community is intermingled with other communities and side slopes are dominated by mountain brush with some juniper at the lower elevations.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Greater Sage Grouse, Moose, Mountain Goat, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.85%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	99.99%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%

Measures for 1a and 1b	Outcome
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	99.99%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited to roads, trails, and old timber cuts in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mixed conifer communities in the north, west, and south of the inventory area have a fire regime of 3 and a condition class of 2. The mixed conifer communities in the eastern part of the inventory area have a fire regime of 4 and a condition class of 1. The mixed conifer communities in the central part the inventory area have a fire regime of 4 and a condition class of 2. The Engelmann spruce communities have a fire regime of 4 and a condition class of 2. The Ponderosa pine communities have a fire regime of 1 and a condition class of 3. The seral Aspen communities have a fire regime of 3 and a condition class of 2. The mountain brush communities in the southern part of the inventory have a fire regime 2 and condition class of 2, fire regime of 2 and condition class of 1, fire regime of 1 and condition class of 2. The pinyon-juniper communities have a fire regime of 1 and condition class of 1.

The Whiterocks wildfire in 1988, Neola North wildfire in 2007, and the Uinta Canyon wildfire in 1989 burned parts of the southwestern part of the inventory area. Three other wildfires occurred in the inventory area in 1974, 1993, and 2001.

Clear cut timber harvests occurred throughout the inventory area in the primarily in the 1970s. There have been multiple individual tree section harvests throughout the area, the majority occurred in the late 1960s and early 1970s.

There are 29 Forest Service system roads cherry stemmed into the inventory area. There are unauthorized routes in the inventory area. The majority of which occur on the lower elevation parts of the south side of the inventory area. There are three trails open to all vehicles in the inventory area, #005, #0075, and #1211.

The inventory area contains parts or all of 13 range allotments, Uinta Rec Livestock, Farm Creek, Whiterocks River, Pole Creek, West Westrocks, Whiterocks Canyon, Dry Fork, Chepeta Lake, Lake Mountain, Marsh Peak, Lakeshore Basin, Taylor Mountain, and Black Canyon. There are multiple spring developments, stock troughs, ponds, and reservoirs, pipelines, and fences in the inventory area. These mainly occur in the southern portion of the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	2,390 acres @ 1.76%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	3,329 acres @ 2.46%

Improvement Type	Extent of Departures (acres)
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None identified
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	274 acres @ 0.20%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There are dispersed camping spots throughout the inventory area
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is adjacent to the Pole Creek Campground, West Fork Whiterocks and Chepeta Trailheads, Chepeta Day Use Area, and Massey Ranch private inholding.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	135,461 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	7,129 acres @ 5.26%

<u>Describe the proximity to private lands and non-Forest Service roads</u>
The inventory area is adjacent to private lands on parts of the southern border.

Describe the general topography of the area in context of sight, sound, and screening
The high elevation headwater areas include rounded and moderately steep alpine slopes and "bollies", cirques, and hummocky ground moraines located along glacial valley bottoms below the cirques. Lakes, ponds, wet depressions, and open and forested knolls are common. The mid elevation glacial bottoms give way to steep to moderately step slopes extending from the ridge tops to the canyon bottoms.

The area along the southern boundary of the inventory area has plateau areas of gently rolling land around Gull Lake to gently sloping shoulders and steep slopes south of Mosby Mountain.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, backpacking, camping, hiking, hunting, fishing, and horseback riding are popular in the inventory area. These activities occur throughout the inventory area.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	11,479 acres (Primitive); 83,186 acres (Semi-Primitive non-motorized) @ 69.88% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	65% @ 88,266 acres
Acres of fens and ground water dependent ecosystems	0.3% @ 455 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	31% @ 42,280 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are peaks throughout the inventory area, including Marsh Peak, Leidy Peak, and Paradise Peak. Cirque basins and lakes are scattered throughout the inventory area. The Whiterocks Cave is within the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	88,761 acres @ 65.52%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	638 acres @ 0.47%

Measure for 3b: Description of any unique geologic features in the area.

Whiterocks Cave contains impressive formations of water deposited minerals.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been some historic and prehistoric surveys in the area. Multiple eligible prehistoric and historic sites have been identified.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area spans 16 watersheds. Clover Creek-Uinta River has a watershed condition class of functioning properly, Pole Creek has a watershed condition class of functioning at risk, West Fork Whiterocks has a watershed condition class of functioning properly, East Fork Whiterocks River has a watershed condition class of functioning properly, Twin Lakes has a watershed condition class of functioning properly, North Fork Ashley Creek has a watershed condition class of functioning properly, South Fork Ashley Creek has a watershed condition class of functioning properly, Brownie Creek has a watershed condition class of functioning properly, Dry Fork – North Fork has a watershed condition class of functioning properly, Dry Fork – Twin Creek has a watershed condition class of functioning at risk, Dry Fork Canyon has a watershed condition class of functioning properly, Upper Deep Creek has a watershed condition class of functioning properly, Mosby Creek has a watershed condition class of functioning properly, Middle Deep Creek has a watershed condition class of functioning properly, Paradise Creek – Whiterocks River has a watershed condition class of functioning properly, and Hominy Creek – Farm Creek has a watershed condition class of functioning properly. A small portion of an additional watershed is included in the inventory area but has not been evaluated for the watershed condition framework.

The inventory area is part of the Green River City, Tridell – Lapoint, Ashley Valley Water, and Deseret Generation and Transmission municipal watersheds.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
Part of the Uinta Shale Creek Research Natural Area is within the inventory area. The Research Natural Area was established in 1996 for the features of; Subalpine fir and Engelmann spruce forest and krummholz, alpine turf communities, and cirque basins draining into moist forest-meadow complexes.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	279 acres @ 0.21%

Question 3f: Are there any scientific or education features in the area?
Research activities are ongoing at some of the high elevation lakes in the inventory area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area shape is very irregular. The area boundary is defined by roads and the Forest boundary in some parts of the inventory area. Most of the boundary is not tied to geographic locations and is difficult to distinguish from lands not included in the inventory.

Measures for 4a	Outcome
Describe if there are any legally established rights or uses within the area.	Part of the inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes. There are Ditch Bill Easements that are surrounded by the inventory area. These are Wigwam Lake and Dam, Papoose Lake and Dam, Moccasin Lake and Dam, Paul Lake, Little Elk Lake, Blanchett Park Diversion and Pipeline, Upper Goose Lake, Lower Goose Lake, and Ashley Twin Lakes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…" The 2017 Uintah County Resource Management Plan states "The County does not support designation of additional areas within the County as federally designated Wilderness".
Describe the management of adjacent lands.	The inventory area is adjacent to the High Uintas Wilderness on the west and north sides. The High Uintas Wilderness is managed according to the 1984 Utah Wilderness Act. The lands adjacent to the inventory to the south include the Uintah and Ouray Indian Reservation, Bureau of Land Management, and private lands. These lands are primarily undeveloped. The inventory area is adjacent to Ashley National Forest lands not included in the inventory, which are managed for multiple use.
Describe the current management of the area.	1% MA d (High Forage Production and Livestock Utilization); 3% MA e (Wildlife Habitat Emphasis); 7% MA f (Dispersed Recreation Roaded); 35% MA g (Undeveloped Dispersed Recreation – Unroaded); 54% Ma n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	115,004 acres @ 84.89%
Type and extent of management restrictions within the area.	90.0% of the inventory area is Inventoried Roadless Area.

Timber Canyon East – 204

Total acres: 10,479

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 1% Alder-leaf Mountain Mahogany, 1% Riparian Deciduous, 21% Douglas fir, 13% Grass, 13% Mountain Big Sagebrush, 1% Persistent Aspen, 17% Pinyon juniper, 20% Ponderosa Pine, and less than 1% of Ponderosa Pine.

The vegetation in the inventory area is influenced by elevation and exposure. The vegetation on the high elevations (7,800 – 9,000 feet) steep slopes of Grassy Hollow and Bumper Canyon consists of dense stands of Douglas fir and aspen on north facing aspects, and sparse pinyon pine Douglas fir on the south aspects. On the less steep slopes of all aspects the vegetation consists of grasses, sagebrush, and mountain mahogany. The vegetation in Rough Canyon and Lion Hollow consists of grasses, sagebrush, and mountain mahogany on the ridge tops and the upper canyon side slopes have dense Douglas fir and mixed conifer.

At mid-elevation along the canyon slopes the vegetation is mostly pinyon pine with some Douglas fir and juniper. Substantial patchy areas of perennial grass and mountain mahogany are intermixed with the pinyon pine-Douglas fir areas. At the lower elevation's persistent aspen and mountain big sagebrush/grass communities cover much of the canyon areas. In Finger Canyon the south to west aspects vegetation consists of sparse pinyon pine-Douglas fir-juniper and the north to east aspects have either moderately dense pinyon pine-Douglas fir or perennial grass-sagebrush-mountain mahogany. The north facing slopes on the south side of Finger Canyon vegetation consists of Douglas fir and mixed coniferous forest stands with and without seral aspen. In Timber Canyon the vegetation is mostly pinyon pine with some Douglas fir and juniper. The bottom lands of Timber Canyon consist of willow, cottonwood, grasses, and sagebrush.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, and Snowshoe Hare.

Timber Canyon is managed for conservation of Colorado River cutthroat trout.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	98.28%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The pinyon pine-juniper communities have a fire regime of 1 and condition class of 2. The Douglas fir communities have a fire regime of 1 and a condition class of 2. The mountain brush communities have a fire regime of 2 and a condition class of 2. The mixed conifer communities have a fire regime of 3 and a condition class of 3. The mountain big sagebrush communities have a fire regime of 2 and a condition class of 2.

There have been five wildfires in the inventory area between 1974 and 2002.

There is one Forest Service System road cherry stemmed into the inventory area, for approximately 5.2 miles. Several unauthorized routes are present. An unauthorized route traverses the complete length of Grassy Hollow.

The inventory area contains a majority of the Long Ridge range allotments and portions of the Timber Canyon and Strawberry allotment. There are numerous spring developments and stock troughs.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	None
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	30 acres @ 0.28%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	There is dispersed camping within the inventory area, primarily along the ridgelines.

Improvement Type	Extent of Departures (acres)
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The private, tribal, and state wildlife reserve lands are primarily undeveloped
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	10,479 acres @ 100%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is partially bordered by private lands on the north, east and south. These lands contain little developments.

Describe the general topography of the area in context of sight, sound, and screening
The terrain consists of ridge and canyon bottom topography with an average of 1,000 relief between ridge tops and canyon bottoms and stream courses generally tread and descend in a north and northeast direction from Long Ridge. The terrain south of Long Ridge descends easterly.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, fishing, and horseback riding occur within the inventory area. Mainly along Timber Canyon, the Rough Canyon Trail #1091, and the bottom lands of Grassy Hollow and Bumper Canyon.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 6,278 acres (Semi-Primitive non-motorized) @ 59.91% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west, the Ashley National Forest to the north and the Manti-La Sal National Forest to the south.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	718 acres @ 6.85%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	21 acres @ 0.20%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been a limited number of historic and prehistoric surveys in the inventory area. No eligible sites have been found.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes portions of three watersheds; Timber Canyon, Finger Canyon-Avintaquin, Minnie Creek-West Fork Avintaquin. Timber Canyon has a watershed condition class of functioning properly and Minnie Creek-West Fork Avintaquin has a watershed condition class of functioning at risk, and Finger Canyon-Avintaquin has a watershed condition class of functioning at risk.

The inventory area contains parts of the Central Utah WCD – Duchesne Valley and Green River City municipal watersheds.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas of research natural area in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0 acres @ 0%

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the inventory area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The shape of the inventory area is irregular. One road is cherry stemmed into the inventory area. The western boundary is formed by roads and the north, east, and south boundaries are the Forest boundary.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The inventory area is adjacent to the Timber Canyon Wildlife Management Area to the east and north, private lands on the north, east, and south and tribal lands on the south and east. These lands are primarily undeveloped. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	29% MA d (High Forage Production and Livestock Utilization); 19% MA f (Dispersed Recreation Roaded); 52% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	10,441 acres @ 99.64%
Type and extent of management restrictions within the area.	99.2% of the inventory area is Inventoried Roadless Area.

Timber Canyon West – 205

Total acres: 24,552

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 12% Douglas fir, 1% Gambel Oak, 15% Grass, 2% Mixed Conifer, 1% Mountain Big Sagebrush, 14% Persistent Aspen, 9% Pinyon – juniper, 34% Seral Aspen, 2% Yellowbrush, and less than 1% Riparian Deciduous, Forbs, Ponderosa Pine, and Tall Willow.

The vegetative cover of the inventory area is influenced by elevation and exposure. Beaver Canyon has a vegetative cover of dense stands of Douglas fir and aspen on north facing slopes, and sparse pinyon pine and Douglas fir on south facing slope. There is some grass, sagebrush, and mountain mahogany on both north and south facing slope. The vegetative cove on Twelve Hundred Dollar Ridge consists of grass, sagebrush, and mountain brush. The south facing slopes of Slab Canyon supports a vegetative cover of aspen, spruce, and fir with intervening openings of forbs, grasses and mountain brush. At lower elevations in Slab Canyon the vegetative cover is old growth ponderosa pine, Douglas fir, aspen, and mountain mahogany.

The vegetation in Shotgun Draw, Jackson Hollow, Pine Hollow, and Timber Canyon consists of fir and seral aspen at the upper drainage areas, Douglas fir and aspen at mid elevations, and sparse pinyon pine/Douglas fir, sagebrush, mountain mahogany, and grasses and the lower elevations. The bottom lands of Timber Canyon consist of willow, cottonwood, grasses, and sagebrush. The vegetation in Cow Hollow, Bull Hollow, and Calf Hollow consists of old growth ponderosa pine, Douglas fir, aspen, and mountain mahogany on the higher elevations slide slopes. On the lower elevation side slopes with a southern aspect the vegetation consists of pinyon pine with some Douglas fir and substantial patchy areas of perennial grass and mountain mahogany are intermixed with the pinyon pine-Douglas fir areas.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, and Snowshoe Hare. Timber Canyon is managed for conservation of Colorado River cutthroat trout.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	97.73%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are generally limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The pinyon pine-juniper communities have a fire regime of 1 and condition class of 2. The Douglas fir communities have a fire regime of 1 and a condition class of 2. The mountain brush communities have a fire regime of 2 and a condition class of 2. The mixed conifer communities have a fire regime of 1 and a condition class of 2.

A broadcast burn of 1258 acres was performed in 2011 on Twelve Hundred Dollar Ridge and the north end Beaver Canyon.

An individual tree selection timber harvest was performed in 1960 between Cow Hollow and Calf Hollow. A regeneration harvest individual tree selection timber cut was performed in 1992 along the Beaver Springs Road in 1992. A regeneration harvest individual tree selection timber cut was performed in 1992 at the head of Beaver Canyon.

The Cow Hollow wildfire in 2005 burned 330 acres of the inventory area and the Cow Hollow wildfire in 2014 burned 290 acres.

There are 6 Forest Service System roads cherry stemmed out of the inventory area, the longest being 5.3 miles. Several unauthorized routes are present, with the majority leading to dispersed camping locations in Beaver Canyon and Twelve Hundred Dollar Ridge. A tractor "cat" trail parallels the water pipeline in Cow Canyon.

The inventory area contains a portion of three active range allotments; Slab Canyon, Timber Canyon, and Strawberry. There are numerous spring developments, stock ponds, reservoirs, and troughs, and range fences.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	1,250 acres @ 5%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	4.84 acres
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None

Improvement Type	Extent of Departures (acres)
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	78 acres @ 0.32%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Dispersed camping locations primarily located in Beaver Canyon and Twelve Hundred Dollar Ridge.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is adjacent to private lands on the north and partially on the east. These lands are undeveloped. The Strawberry River Road is approximately 1 mile north of the inventory area
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	24,551 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads

The inventory area is bordered on the north side by private lands. The Strawberry River county road is approximately 1 mile from the northern boundary.

Describe the general topography of the area in context of sight, sound, and screening

The terrain consists of ridge and canyon bottom topography with an average of 1,000 feet of relief between ride tops and canyon bottoms. Ridges, canyon bottoms and stream courses generally trend and descend in a northeast direction from the western portion of the areas near Willow Creek Ridge to a confluence with Strawberry River immediately north of undeveloped area. The exception to this is the terrain along Timber Canyon where the ridgelines are narrow with short side slopes that descend to Timber Canyon Creek.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occur within the inventory area. Mainly along the south to north trending ridge lines and on the five non-motorized trails in the area.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 13,428 acres (Semi-Primitive non-motorized) @ 54.69% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0.0008% @ 0.19 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west, the Ashley National Forest to the north and the Manti-La Sal National Forest to the south.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
Strawberry Peak, elevation 10,355, is in the western portion of the inventory area, at the southern end of Twelve Hundred Dollar Ridge.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	3,129 acres @ 12.75%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	105 acres @ 0.43%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been a limited number of historic and prehistoric surveys in the inventory area. No eligible sites have been found.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes portions of two watersheds; Timber Canyon and Beaver Canyon-Strawberry River. Timber Canyon has a watershed condition class of functioning properly and Beaver Canyon – Strawberry River has a watershed condition class of functioning properly.

The inventory area is part of the Central Utah WCD – Duchesne Valley and Green River City watersheds.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
The inventory area contains part of the Timber – Cow Hollow Ridge Research National Area. The Timber – Cow Hollow Ridge Research Natural Area is in the Cow Hollow and Calf Hollow area. The following values are associated with the Research Natural Area: vegetation – Ponderosa pine, Douglas fir, aspen; and geologic – sedimentary rocks.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	1,177 acres @ 4.79%

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the inventory area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The shape of the inventory is irregular, with 6 cherry stemmed roads extending into the area. Roads form the southern and part of the western boundary. The Forest boundary forms the north, east, and part of the western boundaries.
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states “Avoid designation of additional areas within the county as federally designated wilderness…”

Measures for 4a	Outcome
Describe the management of adjacent lands.	The inventory area is adjacent to the Uinta Wasatch-Cache National Forest to the west and a majority of these lands have been designated as inventoried roadless area. The lands adjacent to the inventory area on the north are private and the Strawberry River Wildlife Management Area and are primarily undeveloped. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	2% MA a (Research Natural Area Candidates); 28% MA d (High Forage Production and Livestock Utilization); 23% MA f (Dispersed Recreation Roaded); 47% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	24,521 acres @ 99.87%
Type and extent of management restrictions within the area.	99.6% of the inventory area is Inventoried Roadless Area.

Wagon Road Ridge – 242

Total acres: 5,063

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 1% Alder-leaf Mountain Mahogany, 2% Black Sagebrush, 3% Riparian Deciduous, 1% Douglas fir, 4% Engelmann Spruce, 7% Gambel Oak, 11% Grass, 15% Mixed Conifer, 12% Mountain Big Sagebrush, 25% Persistent Aspen, 17% Seral Aspen, 1% Yellowbrush, and less than 1% Fringed Sagebrush.

The vegetative cover is mixed mountain shrub communities with minor inclusions of mixed conifer and aspen at the lower elevations. The higher elevations vegetation includes mixed conifer and aspen as well as grasses on the exposed ridges and meadows. The southern side of the inventory area is primarily south facing hill slopes with Mountain Big Sagebrush and grasses.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, and Snowshoe Hare.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	99.62%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	99.96%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

Describe the extent of invasive fish and animals.
There are no non-native or parasitic wildlife species present. Weeds are limited to roads and trails in the inventory area.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mountain brush communities have a fire regime of 2 and condition class of 2. The Persistent Aspen communities have a fire regime of 3 and a condition class of 2. The mixed conifer communities on the west side of the inventory area have a fire regime of 3 and a condition class of 3. The mixed conifer communities on the east side of the inventory area have a fire regime of 3 and a condition class of 2.

There have been no wildfires in the area over the past 60 years.

An individual tree selection harvest was conducted in 1961 in the inventory area. In 2008 a developed site hazard tree removal project occurred along the southwestern border of the inventory area.

There are three administratively closed Forest Service System roads within the inventory area, longest being approximately 4.8 miles long. Several unauthorized routes are present, the majority of them are located on the southern side of the inventory area.

The inventory area contains portion of two range allotments, Blind Stream and North Fork Duchesne. There are four stock fences, two spring developments, and two stock ponds.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	173 acres @ 3.42%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	18 acres @ 0.36%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	A few dispersed camping sites are located on the eastern boundary of the inventory area, along the Blind Stream road.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	The inventory area is bordered to the south by private lands. These lands have minimal development
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	5,063 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
The inventory area is bordered on its southern boundary by private lands and on a small portion of the southwestern border.

Describe the general topography of the area in context of sight, sound, and screening
The inventory area includes a portion of the foothills of the south slope of the Uinta Mountains. The inventory area covers a part of the ridgeline between the North Fork Duchesne River drainage and the Blind Stream drainage. The area has multiple cliff faces and moderately deep drainages.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occur within the inventory area, mainly along the Slope Hades Canyon trail #1082 and adjacent to the Blind Stream Road on the eastern boundary.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 1,850 acres (Semi-Primitive non-motorized) @ 36.54% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west and the Ashley National Forest.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	2,727 acres @ 53.85%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	62 acres @ 1.22%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been minimal historic and prehistoric surveys in the area. No eligible sites have been located.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area spans three watersheds, Swift Creek – Duchesne River on the west side, Blind Stream on the east side, and Rudy Hollow – Duchesne River in the southcentral portion. Swift Creek – Duchesne River has a watershed condition class of functioning at properly, Blind Stream has a watershed condition class of functioning at risk, and Rudy Hollow – Duchesne River has a watershed condition class of functioning at properly.

The inventory area is part of the Duchesne and Green River City municipal watersheds.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas and/or research natural areas in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0 acres @ 0%

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the inventory area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The shape of the inventory area is blocky. The eastern boundary is formed by the Blind Stream Road. The southern boundary by the Forest boundary. The west and north boundaries are not tied to any landmarks and would be difficult to distinguish from the surrounding area.

Measures for 4a	Outcome
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes. The Rhoades Pipeline Ditch Bill Easement on the southwestern side of the inventory area.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	Private range lands border the inventory area to the south. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	8% MA f (Dispersed Recreation Roaded); 10% MA g (Undeveloped Dispersed Recreation – Unroaded); 1% MA k (Maximum Water Yield Recreation); 81% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	5,057 acres @ 99.88%
Type and extent of management restrictions within the area.	96.0 % of inventory area is Inventoried Roadless Area

Water Hollow – 201

Total acres: 5,007

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 12% Douglas fir, 12% Grass, 24% Mountain Big Sagebrush, 2% Persistent Aspen, 47% Seral Aspen, 2% Tall Willow, and less than 1% Riparian Deciduous, Pinyon – juniper, Rubber Rabbitbrush.

The concave and flat areas along the ridge lines branching out from Reservation Ridge have a vegetative cover of subalpine fir and Douglas fir with and without aspen. Mountain big sagebrush/grass communities are common where tree cover is light. Spiked big sagebrush is found where snow persist into late June and July.

Intervening canyon side slopes and bottoms have a tree cover of Douglas fir and mixed coniferous stands. Seral aspen covers much of the lower and moderate gradients of all aspects and the canyon bottoms. Grasses and other herbaceous species are abundant on the steeper slopes with a southerly aspect.

Along lower elevations along the eastern boundary of the inventory area north facing slopes are usually covered with Douglas fir and pinyon pine-juniper, but no asper. The upper part of the north facing slopes are less steep and supports a shrub vegetation of mountain mahogany, bitterbrush, and sagebrush. The steeper south facing slopes have a cover of grass and some shrub vegetation.

The area provides habitat for a variety of wildlife including Lynx, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Elk, Ruffed Grouse, and Snowshoe Hare. The area also includes the headwaters of Avintaquin Creek which contains a population of Colorado River Cutthroat trout.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	95.55%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. Weeds are limited in the inventory area and mainly occur along roads.

Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.
The mountain brush communities have a fire regime of 2 and condition class of 2. The Douglas fir communities have a fire regime of 1 and a condition class of 2.

The Water Hollow wildfire in 1974 burned approximately 18 acres of the inventory area.

A broadcast burn in 2012, burned 139 acres in the inventory area for wildlife habitat improvement.

There is one Forest Service System road cherry stemmed out of the inventory area, for 1.2 miles. Several unauthorized routes are present, with the majority leading to dispersed camping locations on Reservation Ridge.

The inventory area contains a portion of the Horse Ridge range allotment and portion of the Avintaquin range allotment. There are multiple spring developments and stock ponds.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	None
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	28 acres @ 0.55%
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Dispersed camping sites are primarily located along Reservation Ridge within the inventory area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None

Improvement Type	Extent of Departures (acres)
Lands adjacent to development or activities that impact opportunities for solitude.	None
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	5,007 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

Describe the proximity to private lands and non-Forest Service roads
The small part of the inventory area borders private lands.

Describe the general topography of the area in context of sight, sound, and screening
The terrain consists of ridge and canyon bottom topography, Timber Canyon forms the northern boundary and Long Ridge and Water Hollow the southern boundary. The western portion of the inventory area contains the numerous narrow canyons at the head of Timber Canyon. The center and eastern portions of the inventory area contain the southern slope between the bottom of Timber Canyon and the crest of Long Ridge.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, and horseback riding occur within the inventory area. Mainly along the south to north trending ridge lines.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 0 acres (Semi-Primitive non-motorized) @ 0% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory area provides a corridor habitat for animals moving between the Uinta-Wasatch-Cache National Forest to the west, the Ashley National Forest to the north, and the Manti-La Sal National Forest to the south.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	1,061 acres @ 21.20%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	62 acres @ 1.22%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
A limited number of historic and prehistoric surveys have been performed in the inventory area and no eligible sites have been located.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area includes portions of one watershed, Timber Canyon, it has a watershed condition class of functioning properly.

The inventory area contains parts of the Central Utah WCD – Duchesne Valley and Green River City watersheds.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas and/or research natural areas in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0 acres @ 0%

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the inventory area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The shape is irregular, long and narrow. The inventory areas boundaries are defined by roads on all sides.

Measures for 4a	Outcome
Describe if there are any legally established rights or uses within the area.	The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The inventory area is adjacent to the Uinta Wasatch-Cache National Forest to the west and the lands have been designated and an inventoried roadless area. The adjacent Ashley National Forest lands are managed for multiple use. The inventory area is adjacent to private lands for approximately 0.18 miles on the southern boundary. The private lands are primarily undeveloped.
Describe the current management of the area.	29% MA d (High Forage Production and Livestock Utilization); 23% MA f (Dispersed Recreation Roaded); 48% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	4984 acres @ 99.54%
Type and extent of management restrictions within the area.	99.1% of the inventory area is Inventoried Roadless Area.

Wire Fence – 190

Total acres: 22,239

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
The vegetation in the inventory area consists of 17% Alder-leaf Mountain Mahogany, 1% Basing Big Sagebrush, 5% Black Sagebrush, 16% Douglas fir, 5% Grass, 1% Greasewood, 2% Mountain Brush, 13% Mountain Big Sagebrush, 3% Persistent Aspen, 34% Pinyon – juniper, 3% Rubber Rabbitbrush, and less than 1% 5-needle Pine, Meadow grasses and forbs, and Riparian vegetation.

The vegetative cover in the southern portion on the inventory area consists of dense stands of Douglas fir and aspen on steep northern aspects. The southern aspects support sparse pinyon pine and Douglas fir. On the less steep slope of all aspects the vegetation consists of grasses, sagebrush, and mountain mahogany. The vegetation in the northern portion of the inventory area consists of moderately dense pinyon pine and juniper with substantial patchy areas of perennial grass and mountain mahogany intermixed with pinyon pine and Douglas fir. The drainage bottoms have sagebrush and perennial grasses with a few patches of aspen groves.

The area provides habitat for a variety of wildlife including Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mule Deer, Pronghorn, Elk, Snowshoe Hare, and Greater Sage Grouse.

The inventory area provides habitat for one endemic plant, Erigeron untermannii, Indian Canyon fleabane.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	98.49%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. Weeds are generally limited to the road corridor on the western boundary.

<u>Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.</u>
The mountain brush communities in this inventory polygon have a fire regime of 2, and a condition class of 2. The pinyon juniper communities in the northern portion of the inventory area have a fire regime of 1

and a condition class of 2. The pinyon juniper communities in the central and southern portion of the inventory area have a fire regime of 3 and a condition class of 2. The Douglas fir communities have a fire regime of 1 and a condition class of 3. The Mountain Big Sagebrush communities have a fire regime of 1 and a condition class of 2.

There have been three small wildfires between 2008 and 2016 primarily in the Douglas fir communities in the southern portion of the inventory area. Areas on the northeastern border of the inventory area were cleared of pinyon pine-juniper in the past, these areas have been excluded from the inventory but are surrounded by a small sliver of the inventory area.

There are nine Forest Service System road cherry stemmed into the inventory area. Two of these roads reach more than 5 miles into the inventory area. A Forest Service System trail, #1199, is in the northcentral part of the inventory area. A number of unauthorized routes exist, primarily in the drainage bottoms and are the most prevalent along the Anthro Mountain Road between the Nutters Ridge Road and Road Hollow.

The inventory area has portions of two range allotments, Sowers Canyon and Anthro Mountain. There is a boundary fence on the forest on the northern boundary that marks the border between the Ashley National Forest and the Uintah and Ouray Indian Reservation. There are five other range fences as well as multiple range spring developments, troughs, and reservoirs and two buried range pipelines.

One active oil and gas well pad in the northern portion of the area is cherry stemmed out of the inventory area. There is one planned well pad with an associated planned pipeline that have been cherry stemmed out the inventory area.

There is a powerline with a partially cleared corridor the runs along the western boundary of the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	0.76 acres @ 0.003%
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	167 acres @ 0.75%

Improvement Type	Extent of Departures (acres)
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	Minor dispersed camping locations occur throughout the area.
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	50 acres @ 0.22%
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	There is one active well pad that is surrounded by the inventory area and one on the northwestern border of the inventory area.
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None Identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	22,238 acres @ 99.99%
Area and % total available for winter non-motorized opportunity	0 acres @ 0%

<u>Describe the proximity to private lands and non-Forest Service roads</u>
Private lands border the inventory area at the northern end of Sowers Canyon inside the administrative boundary of the Ashley National Forest. Private lands also border the inventory area on the northern boundary. The private lands are outside the administrative boundary of the forest.

<u>Describe the general topography of the area in context of sight, sound, and screening</u>
The topography of the inventory area is dissected by numerous drainages with steep, long canyon side slopes.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Primitive recreation activities, camping, hiking, hunting, horseback riding, occur with the inventory area, mainly along Sowers Canyon and lower end of the drainages that have confluences with Sowers Canyon. Very few dispersed recreation activities occur in the upper areas of these drainages due to steep terrain and limited access routes.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	0 acres (Primitive); 4,008 acres (Semi-Primitive non-motorized) @ 18.02% combined total
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	0% @ 0 acres
Acres of fens and ground water dependent ecosystems	0% @ 0 acres
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	0% @ 0 acres

Measure for 3a: Description of the coarse scale key connectivity for multiple species

Major road corridors adjacent to the east and west boundaries of the inventory area and off Forest oil and gas exploration and production have disrupted wildlife connectivity.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the inventory area.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	0 acres @ 0%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	2 acres @ 0.01%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the area.

Question 3c: Is there historic or cultural resources of historic value in the area?
Prehistoric surveys have been performed on a portion of the inventory area and a number of prehistoric sites have been found.

Question 3d: Is there high-quality water resources or important watershed features in the area?
The inventory area spans two watersheds, Lance Canyon-Sowers Canyon on the west side and Tabby Canyon-Sowers Canyon on the east side, with Wire Fence ridge separating the watersheds. Lance Canyon-Sowers Canyon has a watershed condition class of functioning at risk and Tabby Canyon-Sowers Canyon of functioning at risk.

The inventory area is part of the Green River City watershed.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas and/or research natural areas in the inventory area.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0 acres @ 0%

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the inventory area.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	The inventory area is irregular with multiple cherry stemmed roads into the area. The area boundary is tied to roads on the west and east and the Forest boundary to the north and south.
Describe if there are any legally established rights or uses within the area.	There are portions of 4 active oil and gas leases and 2 inactive oil and gas leases in the area. The inventory area is within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"
Describe the management of adjacent lands.	The inventory area is adjacent to the Uintah Ouray Indian Reservation lands to the north. The reservation lands are managed for oil and gas production. The inventory area is adjacent to BLM and state lands to the south, which are managed for multiple use. The adjacent Ashley National Forest lands are managed for multiple use.
Describe the current management of the area.	27% MA d (High Forage Production and Livestock Utilization); 1% MA e (Wildlife Habitat Emphasis); 5% MA f (Dispersed Recreation Roaded); 68% MA n (Range of Resource Uses and Outputs)
Acres and % total of wildland urban interface in the area.	7,196 acres @ 32.36%

Measures for 4a	Outcome
Type and extent of management restrictions within the area.	98.9 % of inventory area is Inventoried Roadless Area

Adjacent to Existing Wilderness – 317, 332, 370, 380

Total acres: 317 – 212 ac.; 332 – 165 ac.; 370 – 0.3 ac.; 380 – 7 ac.

Criteria 1: Evaluate the degree to which the area generally appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.

Question 1a. What is the composition of plant and animal communities within the area?
Inventory area #317 is 11% Alpine and 89% mixed conifer. Inventory area #332 is 100% mixed conifer. Inventory area #370 is 100% mixed conifer. Inventory area #380 is 100% Ponderosa pine.

In inventory area #317 the mixed conifer is Engelmann spruce and subalpine fir. The alpine vegetation alpine sedge/grass and forbs and cushion plant, geum sedge, and sedge-grass communities on the steep rocky slope where pockets of soil have formed.

The area provides habitat for a variety of wildlife including Lynx, Goshawk, Bandtailed Pigeons, Black Bear, Blue Grouse, Moose, Mountain Goat, Mule Deer, Rocky Mountain Bighorn Sheep, Elk, Ruffed Grouse, Snowshoe Hare, and Whitetailed Ptarmigan.

Question 1b: What is the extent to which the area reflects ecological conditions that would normally be associated with the area without human intervention?

Measures for 1a and 1b	Outcome
Percent of area that appears to be affected primarily by the force of nature (inverse of the percent of area of timber harvest).	100%
Percent total of the area without invasive weeds (inverse of the percent of total area that has invasive weeds).	100%
Percent of area that is not affected by maintenance level 1 roads (inverse of the percent of area of maintenance level 1 roads).	100%
Percent of area that is not affected by decommissioned roads (inverse of the percent of area of decommissioned roads)	100%
Percent of area that is not affected by known historic roads (inverse of the percent of area of known historic roads).	100%

Measures for 1a and 1b

<u>Describe the extent of invasive fish and animals.</u>
There are no non-native or parasitic wildlife species present. There are no known invasive plants in the four inventory areas.

<u>Describe the departure from natural range of variation in forest composition, structure, patterns and ecological processes.</u>
The four inventory areas are primarily affected by the forces of nature. There are no vegetation treatments or timber harvests in the inventory areas.

Non-motorized trail #1081 traverses inventory area #332 and non-motorized trail #1141 traverses inventory area #317.

Inventory area #317 is within two range allotments, Grandaddy Basin and Rock Creek, inventory area #332 is within North Fork Duchesne allotment, and inventory areas #370 and 380 are within the Uinta Rec Livestock allotment. There are no range improvements within the inventory area.

Question 1c: What is the extent to which improvements (improvement criteria 71.22 from FSH Book 1909.12 chap 70) included in the inventory represent a departure from naturalness?

Improvement Type	Extent of Departures (acres)
Airstrips	None
Heliports	None
Vegetation treatments that are not substantially noticeable.	None
Timber harvest areas where logging and prior road construction are not substantially noticeable.	None
Permanently installed vertical structures, such as electronic installations including cell towers, television, radio, and telephone repeaters, provided their impact, as well as their maintenance and access needs, is minimal.	None
Areas of historic mining where impacts are not substantially noticeable.	None
Areas of mining activity where impacts are not substantially noticeable.	None
Range improvement areas, involving minor structural improvements (for example fences or water troughs) and non-structural improvements (chaining, burning, spraying, potholing, and so forth) that are not substantially noticeable.	None
Recreational improvements, such as occupancy spots, or minor hunting, or outfitting camps.	None
Ground-return telephone lines, electric lines, and power lines if a right-of-way has not been cleared. Exclude power lines with cleared right-of-ways, pipelines, and other permanently installed linear right-of-way structure.	None
Watershed treatment areas (contouring, diking, channeling) that are not substantially noticeable, or if wilderness character can be maintained or restored through appropriate management actions.	None
Lands adjacent to development or activities that impact opportunities for solitude.	None
Structures, dwellings and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.	None Identified

Criteria 2: Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

Question 2a: What is available for outstanding opportunity for solitude?

Measures for 2a	Outcome
Area and % total of area available for summer non-motorized opportunity	384 acres @ 100%
Area and % total available for winter non-motorized opportunity	7 acres @ 1%

Describe the proximity to private lands and non-Forest Service roads

There are no non-Forest Service roads near the four inventory areas. The nearest private land are 2 miles from inventory area #332.

Describe the general topography of the area in context of sight, sound, and screening
The topography varies between the inventory areas. Inventory area #317 is located on the slope to west of Upper Stillwater Reservoir. The area includes an open rock field on a steep mountain slope. Inventory area #332 is in the Duchesne drainage canyon and contains the eastside of the drainage bottom and is gently sloping terrain. Inventory areas #370 and 380 are on the mountain slope above the Uinta River.

Question 2b: What is available in the area for opportunity for primitive and unconfined recreation?
Hiking and horseback riding are the two main primitive recreation activities in the inventory areas #317 and 332. There is no access to inventory areas # #370 and 380 and primitive recreation activities are not likely.

Measures for 2b	Outcome
Acres and % total of primitive and non-primitive classes for summer recreation opportunity spectrum.	#332 – 100% Primitive #317, 370, and 380 – 100% Semi-primitive non-motorized
Acres and % total of primitive and non-primitive ROS winter recreation opportunity spectrum.	NA

Criteria 3: Evaluate the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historic value.

Question 3a: Does the area contain rare plant or animal communities; rare ecosystem for wildlife habitat; rare ecosystem for aquatics; rare ecosystem for terrestrial; any biodiversity hotspots; coarse scale key connectivity for multiple species, or underrepresented/rare vegetation types?

Measures for 3a	Outcome
Habitat for rare plants - Acres of Uinta Bollie LTA	70 acres @ 18.22%
Acres of fens and ground water dependent ecosystems	1.2 acres @ 0.003%
Habitat for Black Rosy-Finch – Acres of Uinta Bollie and Alpine Moraine LTA	323 acres @ 84.11%

Measure for 3a: Description of the coarse scale key connectivity for multiple species

The inventory areas are too small to contribute to coarse scale key connectivity for multiple species.

Question 3b: Is there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?
There are no known outstanding landscape features in the inventory areas.

Measures for 3b	Outcome
Acres and % total of distinctive scenic class	384 acres @ 100%
Outstanding landscapes in acres/% total (extremely steep breakland, cliffs).	0.04 acres @ 99.99%

Measure for 3b: Description of any unique geologic features in the area.

There are no known unique geologic features in the areas.

Question 3c: Is there historic or cultural resources of historic value in the area?
There have been no historic or prehistoric surveys in the inventory areas.

Question 3d: Is there high-quality water resources or important watershed features in the area?
Inventory area #317 is within the Cabin Creek – Rock Creek drainage and has a watershed condition class of functioning properly. Inventory area #332 is within two drainages, Hades Creek – Duchesne River has a watershed condition class of functioning at risk and Little Deer Creek – Duchesne River has a watershed condition class of functioning properly. Inventory area #370 is within the Clover Creek – Uinta River drainage and has a watershed condition class of functioning properly. Inventory area #380 is within two drainages, Atwood Creek-Uinta River has a watershed condition class of functioning properly and Clover Creek – Uinta River drainage and has a watershed condition class of functioning properly.

Inventory area #317 and #332 are within the Central Utah WCD – Duchesne Valley and Green River City municipal watersheds.

Question 3e: Are there any special interest areas and/or research natural areas in the areas?
There are no special interest areas and/or research natural areas in the inventory areas.

Measures for 3e	Outcome
Acres and % of total of special interest areas or research natural areas.	0 acres @ 0%

Question 3f: Are there any scientific or education features in the area?
There are no known scientific or education features in the inventory areas.

Criteria 4: Evaluate the degree to which the area may be managed to preserve its wilderness characteristics

Question 4a: How can the area be managed to preserve its wilderness character?

Measures for 4a	Outcome
Describe the shape and configuration of the area.	Inventory area #317 is blocky in shape. The boundaries of #17 are not tied to geographic features. Inventory area # is long and thin and the western boundary is adjacent to the Ashley National Forest and Uinta-Wasatch-Cache boundaries. Inventory areas #370 and 380 are irregular in shape and the boundaries are not tied to any geographic location.
Describe if there are any legally established rights or uses within the area.	The inventory areas are within the Uintah Special Meridian, which includes the entire Roosevelt and Duchesne Districts, are within the original Uintah Valley Indian Reservation and have reserved treaty rights by the Ute Indian Tribe. Treaty rights are described in a variety of treaties with the Ute Indian Tribe and have been clarified in multiple court decisions, executive orders, and federal statutes.
Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics?	An objective in the 2017 Duchesne County resource management plan states "Avoid designation of additional areas within the county as federally designated wilderness…"

Measures for 4a	Outcome
Describe the management of adjacent lands.	The areas are adjacent to the High Uintas Wilderness which is managed according to the 1984 Utah Wilderness Act. The adjacent non-wilderness National Forest Service lands are managed for multiple use.
Describe the current management of the area.	Inventory Area #317 – 67% MA g (Undeveloped dispersed recreation – unroaded) and 33% MA n (Range of resource uses and outputs) Inventory Area #332 - 33% MA n (Range of resource uses and outputs) Inventory Area #370 - 100% MA g (Undeveloped dispersed recreation – unroaded) Inventory Area #380 - 100% MA g (Undeveloped dispersed recreation – unroaded)
Acres and % total of wildland urban interface in the area.	377 acres @ 98.18%
Type and extent of management restrictions within the area.	100% of the inventory areas are within Inventoried Roadless Areas

Step 3: Analysis

After the evaluation step, the forest identified four (4) potential wilderness areas to be included in the alternatives.

Table G-3 provides a snapshot of the recommended wilderness areas that are included in each alternative, including the inventory polygon it originated from, and the approximate acres.

Maps of the recommended wilderness areas that are included in alternative C, are displayed in final EIS Appendix A. Figure 2-21.

In addition to the analysis in the draft EIS and final EIS, the FSH 1909.12, chapter 70, requires that the following items be discussed for each recommend wilderness area in each Alternative where it was identified:

- The name of the area and number of acres to be considered for recommendation;
- The location and a summarized description of a boundary for each recommended area;
- A brief description of the general geography, topography and vegetation of the recommended area;
- A brief description of the current uses and management of the area.
- A description of the area's wilderness characteristics and the ability to protect and manage the area to preserve its wilderness characteristics;
- A brief summary of the factors considered, and the process used in evaluating the area and developing the alternatives;
- A brief summary of the ecological and social characteristics that would provide the basis for the area's suitability for inclusion in the National Wilderness Preservation System.

Not all lands included in the inventory and subsequent evaluations are required to be carried forward in an alternative

Recommended Wilderness by Alternative

Table G-3. Recommended Wilderness Area by Alternative

Recommended Wilderness Area	Alternative	Original Wilderness Inventory Polygon
Flat Top Mountain	C	Flat Top Mountain
Goose Egg Peak	C	South Slope East Uintas
East Uintas	C	South Slope East Uintas and North Slope East Uintas
Queant Lake	C	South Slope East Uiintas

Alternative A

The no-action alternative is based on the 1986 Forest Plan, which had no acres as recommend wilderness.

Alternative B Modified

No areas were recommended for wilderness in alternative B modified, the preferred alternative, to respond to issues identified in comments on the draft EIS. Comments identified a desire to not recommend any additional acres to be managed as recommended wilderness. The commenters suggested that existing wilderness on the Ashley National Forest (276,175 acres designated wilderness out of

1,384,132 acres total) provide sufficient opportunities and benefits, other non-wilderness land special designations or categories provide management requirements, and that additional recommended wilderness designation promotes higher degrees of multiple use conflicts on remaining lands.

Please refer to the recommended wilderness analysis in the draft EIS, *Chapter 3. Affected Environment and Environmental Consequences*, for the analysis related to recommended wilderness in alternative B and to the final EIS for analysis related to alternative B modified.

Alternative C

Alternative C includes the Flat Top Mountain, Goose Egg Peak, East Uintas and Queant Lake recommended wilderness areas. The 50,157 acres of recommended wilderness in Alternative C were selected based upon consideration of the information with the wilderness evaluation and to respond to issues identified in the scoping of the proposed action. A number of scoping comments identified a desire for all inventoried roadless areas to managed as recommended wilderness. The 50,157 acres recommended for wilderness under this alternative includes additional acres within inventoried roadless areas and the wilderness evaluation indicated these areas had wilderness characteristics such as naturalness, undeveloped, outstanding opportunities for solitude or a primitive and unconfined recreation or other special features such as ecological, geological, or scientific, educational, scenic, or historic value.

The remaining acres that were within the wilderness inventory area and inventoried roadless areas and not selected to be included under this alternative were determined to not be responsive to the input received in scoping and have either conflicting uses that do not reflect the balance of multiple use the forest was striving for in this alternative and/or did not possess sufficient wilderness characteristics. Please refer to the recommended wilderness analysis in the draft environmental impact statement, *Chapter 3. Affected Environment and Environmental Consequences*, for the analysis.

East Uintas Recommended Wilderness Area

This recommended wilderness area is derived from the North Slope East Uintas and South Slope East Uintas wilderness inventory areas.

Table G-4. East Uinta recommended wilderness area

Analysis Factor	Description
1. Acres	23,240
2. Summarized description of the recommended boundary	The western boundary is adjacent to the High Uintas Wilderness on the Uinta Wasatch Cache National Forest. The northern boundary follows a section line, then follows contour lines from the North Fork of Sheep Creek to west of Spirit Lake where it follows section lines south and then east. South of Spirit Lake the northern boundary then follows contour lines east to north of Weyman Park. The boundary then bisects the ridge and follows landscape features around north and east of Bear Park to Weyman Creek. The boundary follows contour lines east to the Sheep Creek Canal and follows the canal east to the eastern boundary. The eastern boundary follows landscape feature from the Sheep Creek Canal to the north side of Leidy Peak. The southern boundary follows the ridgeline between the north slope and south slope of the Uinta Mountains from Leidy Peak west and then follows contour lines north of Papoose Lake, and then bisects the Walkup Lake drainage to the boundary with the High Uintas Wilderness. Refer to figure G-1 for a map of this area.
3. Brief description of the general geography, topography, and vegetation	The area is located on the north slope of the spine of the eastern Uinta Mountains, and small portion of the south slope of the eastern Uinta Mountains. It spans the area from the boundary of the Ashley and UWC National Forests on the west and Leidy Peak on the east. The area includes numerous small and large lakes including Tamarack, Jessen, Lilly Pad, Lost, Weyman, Anson, Lamb, Potter, and Pollen Lakes. Sections of the South Fork Sheep Creek, Weyman creek and West Fork and East Forks of Carter Creek are within the area. The topography includes cirques, lakes and wet meadows between high elevation “bollie” glaciated ridge tops descending to lower drainages which trend north. In the lower drainages standing water is common and riparian communities are dominant. The vegetation within the polygon includes high elevation boulder fields that support little, if any, alpine vegetation. Vegetation cover on the rounded high elevation “bollies” consists of sedges, moss, dwarf clover and other alpine vegetation. The drainages between the bollies are a mixed dense conifer forest of Engelmann spruce, lodgepole pine, and subalpine fir. The riparian communities have lodgepole and spruce tree cover and wet under story vegetation.

Analysis Factor	Description
4. Current uses and management	The Pollen Lake RNA is on the eastern end of the area. The entire area is within an inventoried roadless area. Much of the area is within an active grazing allotment, but there are no range developments in the area. There are over 28 miles of Forest Service System non-motorized trails within the area. Major recreational activities in the area are hiking, backpacking, fishing, horseback riding, and hunting. The entire area is currently open to over snow motorized vehicle use some parts are popular snowmobiling areas.
5. Description of the wilderness characteristics and the Forest's ability to protect and manage the area so as to preserve its wilderness characteristics	**Natural Quality** – The majority of this area is very natural appearing, and the current vegetation is primarily affected by natural ecological processes. Most of this area has intact ecological integrity and generally appears to refection ecological condition that would be associated with the area without human intervention. **Undeveloped** - The area is mostly undeveloped, with high potential for primitive and unconfined recreation and solitude. The area has a high level of apparent naturalness and is mostly untrammeled. **Unconfined and/or primitive recreation** – This area has outstanding amount of unconfined and primitive recreation opportunities: hunting, backpacking, hiking, fishing, wildlife viewing, backcountry skiing, snowshoeing, Nordic skiing, and gathering forest products. **Solitude** – There is outstanding opportunity for solitude as the sights and sounds of human activities and improvements are screened by topography or do not have impact due to distance, this area is remote. **Other Features of Value** - None
6. Brief summary of the factors considered, and the process used in evaluating the area and developing the alternative(s)	o There is public interest to recommend all inventoried wilderness areas as wilderness o This area is adjacent to the High Uintas Wilderness and would expand it by 23,240 acres.
7. Brief summary of the ecological and social characteristics that would provide the basis for suitability for inclusion in the National Wilderness Preservation System	The <u>ecological characteristics</u> that provide the basis for suitability area the: o The naturalness of the area is very high as much of area is affected primarily by natural forces and has mostly intact ecological integrity. o The undeveloped quality of the area is very high, it is unroaded, and there are no motorized Forest Service System trails and 28 miles of non-motorized Forest Service System Trails The <u>social characteristics</u> that provide the basis for suitability are the: o The area offers outstanding opportunity for solitude o There is high amount of primitive and/or unconfined recreation for hunting, hiking, backpacking, fishing, cross country skiing, and wildlife viewing

Queant Lake Recommended Wilderness Area

This recommended wilderness area is derived from the and South Slope East Uintas wilderness inventory area.

Table G-5. Queant Lake recommended wilderness area

Analysis Factor	Description
1. Acres	16,582
2. Summarized description of the recommended boundary	The western and southern boundaries of the area is the boundary to the High Uintas Wilderness. The northern boundary starts at the High Uintas Wilderness boundary on the Uinta Wasatch Cache National Forest. The boundary then bisects the Walkup Lake drainage and meets the eastern boundary west of Wigwam Lake. The eastern boundary starts west of Wigwam lake and follows contour lines and landscape features south around the ridgeline west of Hidden Lake, up the West Fork Whiterocks Drainage, south to Rasmussen Lakes and then bisects the ridge line south of Rasmussen Lakes to the boundary of the High Uintas Wilderness. Refer to figure G-1 for a map of this area.
3. Brief description of the general geography, topography, and vegetation	The area is located adjacent to the eastern boundary of the Ashley NFs portion of the High Uintas Wilderness, west of Chepeta Lake and the West Fork of White Rocks Trailhead. The area contains the headwaters of the West Fork of Whiterocks River and Reader Creek is also in the area. There are multiple large and small lakes in the area including Queant Lake, Cleveland Lake, Taylor Lake, Elbow Lake, Reader Lakes. The topography of the area includes high mountain rounded and moderately steep alpine slopes and bollies, cirques basins, and hummocky ground moraines along the glacial valley bottoms below the cirques. Between the rounded peaks and ridges are wide drainages with large and small dry and wet meadows. The vegetation within the polygon includes high elevation boulder fields that support little, if any, alpine vegetation. Vegetation cover on the rounded high elevation “bollies” consists of sedges, moss, dwarf clover and other alpine vegetation. The south trending slope below the rounded ridgeline include lodgepole pine, Engelmann spruce, and subalpine fir. The dry meadows in the drainages contain sedges and grasses. The wet meadow contains sedges, grasses, and low growth willows
4. Current uses and management	The entire area is within an inventoried roadless area. A small part of the area on the western boundary is part of the Uinta Shale RNA The entire area is open to over snow motorized vehicle use and it is a moderately popular snowmobiling area. There is no current livestock grazing in the area and no range improvements. Queant Lake is a popular horse packing location for larger groups. Queant Lake and Rasmussen Lake are a popular backpacking location for larger groups. The entire area is a popular backpacking and horse packing location for larger groups, especially Queant Lake for stockmen and Queant Lake, Rasmussen Lake, and Reader Lakes for backpackers. Major recreational activities in the area are hiking, backpacking, fishing, horseback riding, and hunting.

Analysis Factor	Description
5. Description of the wilderness characteristics and the Forest's ability to protect and manage the area so as to preserve its wilderness characteristics	**Natural Quality** – The majority of this area is very natural appearing, and the current vegetation is primarily affected by natural ecological processes. Most of this area has intact ecological integrity and generally appears to refection ecological condition that would be associated with the area without human intervention. **Undeveloped -** The area is mostly undeveloped, with high potential for primitive and unconfined recreation and solitude. The area has a high level of apparent naturalness and is mostly untrammeled. **Unconfined and/or primitive recreation** – This area has outstanding amount of unconfined and primitive recreation opportunities: hunting, backpacking, hiking, fishing, wildlife viewing, backcountry skiing, snowshoeing, Nordic skiing, and gathering forest products. **Solitude** – There is outstanding opportunity for solitude as the sights and sounds of human activities and improvements are screened by topography or do not have impact due to distance, this area is remote **Other Features of Value -** None
6. Brief summary of the factors considered, and the process used in evaluating the area and developing the alternative(s)	o There is public interest to recommend all inventoried wilderness areas as wilderness o This area is adjacent to the High Uintas Wilderness and would expand it by 16,582 acres.
7. Brief summary of the ecological and social characteristics that would provide the basis for suitability for inclusion in the National Wilderness Preservation System	The <u>ecological characteristics</u> that provide the basis for suitability area the: o The naturalness of the area is very high as much of area is affected primarily by natural forces and has mostly intact ecological integrity. o The undeveloped quality of the area is very high, it is unroaded, and there are no motorized Forest Service System trails and 16 miles of non-motorized Forest Service System Trails. The <u>social characteristics</u> that provide the basis for suitability are the: o The area offers outstanding opportunity for solitude o There is high amount opportunities for primitive and/or unconfined recreation of hunting, hiking, backpacking, fishing, cross country skiing, and wildlife viewing

Flat Top Mountain Recommended Wilderness Area

This recommended wilderness area is derived from the Flat Top Mountain Inventory Area

Table G-6. Flat Top Mountain recommended wilderness area

Analysis Factor	Description
1. Acres	3,965
2. Summarized description of the recommended boundary	The north and west boundary of the Flat Top potential wilderness area lies adjacent to the southeast edge of the High Uintas Wilderness. The eastern boundary follows a section line for part of the eastern boundary and then follows an elevation contour line to north of Heller Lake. The southern boundary bisects Flat Top Mountain until it meets the High Unitas Wilderness Boundary. Refer to figure G-1 for a map of this area.
3. Brief description of the general geography, topography, and vegetation	The area is adjacent to part of the southern boundary of the High Uintas Wilderness between the Uinta Canyon and Dry Gulch Creek. Lily Pad Lakes and part of Flat Top Mountain are within the area. The topography of the area is moderately sloping terrain from high rounded ridgetop “bollies” on the northern boundary to the south. Meadows and talus fields of various sizes are located throughout area. The vegetation within the polygon includes high elevation boulder fields that support little, if any, alpine vegetation. Vegetation cover on the rounded high elevation “bollies” consists of sedges, moss, dwarf clover and other alpine vegetation. The south trending slope below the rounded ridgeline includes lodgepole pine, Engelmann spruce, subalpine fir, and some Douglas fir. The dry meadows in the uplands contain sedges and grasses. The wet meadows contain sedges, grasses, and low growth willows.
4. Current uses and management	The entire area is inventoried roadless area. Most of the area is within an active grazing allotment. Hunting is very popular in the fall throughout the area. There is a permitted seasonal outfitter and guide camp at Lily Pad Lakes. The area is currently open to over snow motorized vehicle use.
5. Description of the wilderness characteristics and the Forest’s ability to protect and manage the area so as to preserve its wilderness characteristics	**Natural Quality –** The majority of this area is very natural appearing, and the current vegetation is primarily affected by natural ecological processes. Most of this area has intact ecological integrity and generally appears to refection ecological condition that would be associated with the area without human intervention. **Undeveloped -** The area is mostly undeveloped, with high potential for primitive and unconfined recreation and solitude. The area has a high level of apparent naturalness and is mostly untrammeled. **Unconfined and/or primitive recreation –** This area has outstanding amount of unconfined and primitive recreation opportunities: hunting, backpacking, hiking, fishing, wildlife viewing, backcountry skiing, snowshoeing, Nordic skiing, and gathering forest products. **Solitude –** There is outstanding opportunity for solitude as the sights and sounds of human activities and improvements are screened by topography or do not have impact due to distance, this area is remote. **Other Features of Value -** None

Analysis Factor	Description
6. Brief summary of the factors considered, and the process used in evaluating the area and developing the alternative(s)	o There is public interest to recommend all inventoried wilderness areas as wilderness o This area is adjacent to the High Uintas Wilderness and would expand it by 3,965 acres.
7. Brief summary of the ecological and social characteristics that would provide the basis for suitability for inclusion in the National Wilderness Preservation System	The ecological characteristics that provide the basis for suitability area the: o The naturalness of the area is very high as much of area is affected primarily by natural forces and has mostly intact ecological integrity. o The undeveloped quality of the area is very high, it is unroaded, and there are no motorized or non-motorized Forest Service System Trails. The social characteristics that provide the basis for suitability are the: o The area offers outstanding opportunity for solitude o There is high amount of primitive and/or unconfined recreation for hunting, hiking, backpacking, fishing, cross country skiing, and wildlife viewing

Goose Egg Peak Recommended Wilderness Area

This recommended wilderness area is derived from the South Slope East Uintas wilderness inventory area.

Table G-7. Goose Egg Peak recommended wilderness area

Analysis Factor	Description
1. Acres	6,370
2. Summarized description of the recommended boundary	The northern boundary of the Goose Egg Peak potential wilderness area is adjacent to the southeast corner of the High Uintas Wilderness. The eastern boundary bisects the ridge line north of Upper Rock Lake. The southern boundary following a contour line east of Upper Rock Lake and Middle Rock Lake, then bisects the slope to the east fork of the Clover Creek. The western boundary following the ridgeline above Uinta Canyon to the west. Refer to figure G-1 for a map of this area.
3. Brief description of the general geography, topography, and vegetation	The area is located adjacent to the southeastern boundary of the High Uintas Wilderness, northeast of Pole Mountain and the Pole Creek Campground. Upper and Middle Rock Lakes and Bills Lake are within the area. The headwaters of Clover Creek and Pole Creek are within the area. The topography of the area includes high mountain rounded ridges and moderately steep alpine slopes and bollies, cirques basins, and hummocky ground moraines along the glacial valley bottoms below the cirques. On the eastern side of the area is large cirque basin containing Upper Rock Lake and Middle Rock Lake. On the western side of the area and south of the high mountain rounded ridges is a wide moderately sloped drainage trending to the south. The vegetation within the polygon includes high elevation boulder fields that support little, if any, alpine vegetation. Vegetation cover on the rounded high elevation “bollies” consists of sedges, moss, dwarf clover and other alpine vegetation. The south trending slope below the rounded ridgeline on the west side of the area and the drainage below the Upper Rock Lake cirque basin includes lodgepole pine, Engelmann spruce, and subalpine fir. The dry meadows in the drainages contain sedges and grasses. The wet meadows contain sedges, grasses, and low growth willows.
4. Current uses and management	The entire area is inventoried roadless area. Much of the area is within an active grazing allotment, but there are no range developments in the area. There are no developed trails within the area, some fishing and hiking activity occurs at Upper and Middle Rock Lakes and some hunting in the fall. Most of the area is currently open to over snow motorized vehicle use.

Analysis Factor	Description
5. Description of the wilderness characteristics and the Forest's ability to protect and manage the area so as to preserve its wilderness characteristics	**Natural Quality –** The majority of this area is very natural appearing, and the current vegetation is primarily affected by natural ecological processes. Most of this area has intact ecological integrity and generally appears to refection ecological condition that would be associated with the area without human intervention. **Undeveloped -** The area is mostly undeveloped, with high potential for primitive and unconfined recreation and solitude. The area has a high level of apparent naturalness and is mostly untrammeled. **Unconfined and/or primitive recreation –** This area has outstanding amount of unconfined and primitive recreation opportunities: hunting, backpacking, hiking, fishing, wildlife viewing, backcountry skiing, snowshoeing, Nordic skiing, and gathering forest products. **Solitude –** There is outstanding opportunity for solitude as the sights and sounds of human activities and improvements are screened by topography or do not have impact due to distance, this area is remote. **Other Features of Value -** None
6. Brief summary of the factors considered, and the process used in evaluating the area and developing the alternative(s)	o There is public interest to recommend all inventoried wilderness areas as wilderness o This area is adjacent to the High Uintas Wilderness and would expand it by 6,370 acres.
7. Brief summary of the ecological and social characteristics that would provide the basis for suitability for inclusion in the National Wilderness Preservation System	The <u>ecological characteristics</u> that provide the basis for suitability area the: o The naturalness of the area is very high as much of area is affected primarily by natural forces and has mostly intact ecological integrity. o The undeveloped quality of the area is very high, it is unroaded, and there are no motorized or non-motorized Forest Service System Trails. The <u>social characteristics</u> that provide the basis for suitability are the: o The area offers outstanding opportunity for solitude o There is high amount of primitive and/or unconfined recreation for hunting, hiking, backpacking, fishing, cross country skiing, and wildlife viewing

Figure G-1. Alternative C Recommended Wilderness

Alternative D

No areas were recommended for wilderness for this alternative to respond to issues identified in the scoping of the proposed action. Scoping comments identified a desire to not recommend any additional acres to be managed as recommended wilderness. The comments suggested that existing wilderness on the Ashley National Forest (276,175 acres out of 1,384,132 acres designated wilderness) provide sufficient opportunities and benefits and that additional recommended wilderness designation promotes higher degrees of multiple use conflicts on remaining lands. Please refer to the recommended wilderness analysis in the draft environmental impact statement, *Chapter 3. Affected Environment and Environmental Consequences*, for the analysis.

Summary of Areas Excluded in Alternatives by Wilderness Inventory Areas

For each wilderness area evaluated or portions that are not included in an alternative in the applicable National Environmental Policy Act analysis, the following tables document the reasons for excluding it from further analysis. The maps of the Evaluation of Wilderness Inventory Areas are located online at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd681571.pdf.

Alkali Canyon Wilderness Inventory Area – 20,306 acres

Table G-8. Alkali Canyon wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Five Forest Service System roads and cherry stemmed out of the area • Two motorized trails in southern part of area • Range improvements in south and central part of area • One active well pad adjacent to area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Five Forest Service System roads and cherry stemmed out of the area • Two motorized trails in southern part of area • Range improvements in south and central part of area • One active well pad adjacent to area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Big Ridge Wilderness Inventory Area – 23,666 acres

Table G-9. Big Ridge wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Six Forest Service System roads cherry stemmed out of the area • Seven miles of Forest Service System motorized trails open to 50 inches or less in the area • Multiple range improvements throughout the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Six Forest Service System roads cherry stemmed out of the area • Seven miles of Forest Service System motorized trails open to 50 inches or less in the area • Multiple range improvements throughout the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Carter Creek Wilderness Inventory Area – 7,853 acres

Table G-10. Carter Creek wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Seven Forest Service system roads cherry stemmed out of the area • Past vegetation treatments • Private inholding within the area • Adjacent to State Highway 44 and the Red Canyon corridor

Alternative	Recommended Wilderness	Rationale
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Seven Forest Service system roads cherry stemmed out of the area • Past vegetation treatments • Private inholding within the area • Adjacent to State Highway 44 and the Red Canyon corridor
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Cottonwood Wilderness Inventory Area – 26,585 acres

Table G-11. Cottonwood wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Eight Forest Service System roads cherry stemmed out of the area • Three active well pads cherry stemmed out of the area • Three private inholdings within the area • Multiple range developments within the area • Two active oil and gas leases within the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Eight Forest Service System roads cherry stemmed out of the area • Three active well pads cherry stemmed out of the area • Three private inholdings within the area • Multiple range developments within the area • Two active oil and gas leases within the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Cow Hollow Wilderness Inventory Area – 18,026 acres

Table G-12. Cow Hollow wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Two Forest Service System roads cherry stemmed out of the area • Four Forest Service System motorized trails open to 50 inches or less within the area • Two Forest Service System motorized trails open to all vehicles within the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Two Forest Service System roads cherry stemmed out of the area • Four Forest Service System motorized trails open to 50 inches or less within the area • Two Forest Service System motorized trails open to all vehicles within the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Dry Ridge Wilderness Inventory Area – 23,509 acres

Table G-13. Dry Ridge wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Six Forest Service System roads cherry stemmed out of the area, including the Dry Ridge road which almost bisects the center of the area • Multiple range developments throughout the area

Alternative	Recommended Wilderness	Rationale
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Six Forest Service System roads cherry stemmed out of the area, including the Dry Ridge road which almost bisects the center of the area • Multiple range developments throughout the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Dyer Mtn Wilderness Inventory Area – 7,788 acres

Table G-14. Dyer Mtn wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Seven Forest Service System Roads cherry stemmed out of the area • Two Forest Service System motorized trails open to 50 inches or less within the area • Three private inholdings within the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Seven Forest Service System roads cherry stemmed out of the area • Two Forest Service System motorized trails open to 50 inches or less within the area • Three private inholdings within the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Flat Top Mountain Wilderness Inventory Area – 20,010 acres

Table G-15. Flat Top Mountain wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0%	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. . • Three Forest Service System roads cherry stemmed out of the southern and central part of the area • One Forest Service System motorized trail within the southern part of the area. • Multiple range improvements in the southern and central part of the area
C	20%	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. Twenty percent of this area is the Flat Top Mountain recommended wilderness area. • Three Forest Service System roads cherry stemmed out of the southern and central part of the area • One Forest Service System motorized trail within the southern part of the area. • Multiple range improvements in the southern and central part of the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Goslin Wilderness Inventory Area – 7,066 acres

Table G-16. Goslin wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • One Forest Service System road cherry stemmed out of the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • One Forest Service System road cherry stemmed out of the area

Alternative	Recommended Wilderness	Rationale
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Grizzly Ridge Wilderness Inventory Area – 6,734 acres

Table G-17. Grizzly Ridge wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Four Forest Service System roads cherry stemmed out of the area • Two Forest Service System motorized trails open to 50 inches or less in the area • One Forest Service System motorized trail open to all vehicles within the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Four Forest Service System roads cherry stemmed out of the area • Two Forest Service System motorized trails open to 50 inches or less in the area • One Forest Service System motorized trail open to all vehicles within the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Indian Springs Wilderness Inventory Area – 5,573 acres

Table G-18. Indian Springs wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Six Forest Service System roads cherry stemmed out of the area • One Forest Service System motorized trail 50 inches or less in the area • One Forest Service System motorized trail open to all vehicles in the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Six Forest Service System roads cherry stemmed out of the area • One Forest Service System motorized trail 50 inches or less in the area • One Forest Service System motorized trail open to all vehicles in the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Lake Fork Mtn Wilderness Inventory Area – 18.063 acres

Table G-19. Lake Fork Mtn wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Six Forest Service System roads cherry stemmed out of the area • One Forest Service System motorized trail open to 50 inches or less in the area • Past vegetation treatments and timber harvests throughout the area

Alternative	Recommended Wilderness	Rationale
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Six Forest Service System roads cherry stemmed out of the area • One Forest Service System motorized trail open to 50 inches or less in the area • Past vegetation treatments and timber harvests throughout the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Lambson Draw Wilderness Inventory Area – 5,005 acres

Table G-20. Lambson Draw wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • One Forest Service System road cherry stemmed out of area • Private inholdings within the area • Adjacent to multiple private lands • Difficult to manage as wilderness due to location
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • One Forest Service System road cherry stemmed out of area • Private inholdings within the area • Adjacent to multiple private lands • Difficult to manage as wilderness due to location
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Mill Hollow Wilderness Inventory Area – 6,301 acres

Table G-21. Mill Hollow wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Five Forest Service System roads cherry stemmed out of the area • One Forest Service System motorized trail open to all vehicles in the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Five Forest Service System roads cherry stemmed out of the area • One Forest Service System motorized trail open to all vehicles in the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Mt Lena Wilderness Inventory Area – 34,114 acres

Table G-22. Mt Lena wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Seven Forest Service System roads cherry stemmed out of the area • Two Forest Service System motorized trails open to 50 inches or less in the area • Three Forest Service System motorized trails open to all vehicles in the area • Multiple range developments in the southern part of the are

Alternative	Recommended Wilderness	Rationale
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Seven Forest Service System roads cherry stemmed out of the area • Two Forest Service System motorized trails open to 50 inches or less in the area • Three Forest Service System motorized trails open to all vehicles in the area • Multiple range developments in the southern part of the are
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

North Slope East Unitas Wilderness Inventory Area – 66,791 acres

Table G-23. North Slope East Uintas wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Six Forest Service System roads cherry stemmed out of the area • Four Forest Service System motorized trails open to 50 inches or less in the area • Five Ditch Bill Easements surrounded by the area
C	33%	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. Part of the area, 33%, is the identified East Uintas recommended wilderness area. • Six Forest Service System roads cherry stemmed out of the area • Four Forest Service System motorized trails open to 50 inches or less in the area • Five Ditch Bill Easements surrounded by the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Nutters Canyon Wilderness Inventory Area – 6,642 acres

Table G-24. Nutters Canyon wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • One Forest Service System road cherry stemmed out of the area • Multiple range improvements throughout the area • Four active well pads cherry stemmed out of area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • One Forest Service System road cherry stemmed out of the area • Multiple range improvements throughout the area • Four active well pads cherry stemmed out of area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Pole Creek Wilderness Inventory Area – 13,207 acres

Table G-25. Pole Creek wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Three Forest Service System roads cherry stemmed into the area • One Forest Service System motorized trail open to all vehicles in the area • Multiple range improvements in the southern part of the area

Alternative	Recommended Wilderness	Rationale
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Three Forest Service System roads cherry stemmed into the area • One Forest Service System motorized trail open to all vehicles in the area • Multiple range improvements in the southern part of the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Right Fork Indian Canyon Wilderness Inventory Area – 46,310 acres

Table G-26. Right Fork Indian Canyon wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Thirteen Forest Service System roads cherry stemmed out of the area • Multiple range improvements throughout the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Thirteen Forest Service System roads cherry stemmed out of the area • Multiple range improvements throughout the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Sheep Creek East Wilderness Inventory Area – 7,579 acres

Table G-27. Sheep Creek East wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Two Forest Service System roads cherry stemmed out of the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Two Forest Service System roads cherry stemmed out of the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Sheep Creek West Wilderness Inventory Area – 7,382 acres

Table G-28. Sheep Creek West wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Past vegetation treatments
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Past vegetation treatments
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

South Fork Rock Creek Wilderness Inventory Area – 8,925 acres

Table G-29. South Fork Rock Creek wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Four Forest Service System road cherry stemmed out of the area • Two Forest Service System motorized trails open to all vehicles within the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Four Forest Service System road cherry stemmed out of the area • Two Forest Service System motorized trails open to all vehicles within the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

South Slope East Uintas Wilderness Inventory Area – 135,466 acres

Table G-30. South Slope East Uintas wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Twenty-nine Forest Service System roads cherry stemmed out of the area • Multiple Ditch Bill easements that are surrounded by the area
C	16%	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. Part of the area is the identified as part of the East Uintas, the entire Queant Lake, and entire Goose Egg Peak recommended wilderness areas. • Twenty-nine Forest Service System roads cherry stemmed out of the area • Multiple Ditch Bill easements that are surrounded by the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Timber Canyon East Wilderness Inventory Area – 10,719 acres

Table G-31. Timber Canyon East wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • One Forest Service System road cherry stemmed out of the inventory area • Multiple range improvements throughout the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • One Forest Service System road cherry stemmed out of the inventory area • Multiple range improvements throughout the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Timber Canyon West Wilderness Inventory Area – 24,552 acres

Table G-32. Timber Canyon West wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Six Forest Service System roads cherry stemmed out of the area • Multiple range improvements throughout the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Six Forest Service System roads cherry stemmed out of the area • Multiple range improvements throughout the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Wagon Road Ridge Wilderness Inventory Area – 5,063 acres

Table G-33. Wagon Road Ridge wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Three Forest Service System administratively closed roads in the area. • Multiple range improvements within the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Three Forest Service System administratively closed roads in the area. • Multiple range improvements within the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Water Hollow Wilderness Inventory Area – 5,007 acres

Table G-34. Water Hollow wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • One Forest Service System road cherry stemmed out the area • Multiple range improvements throughout the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Three Forest Service System administratively closed roads in the area. • Multiple range improvements within the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Wire Fence Wilderness Inventory Area – 22,239 acres

Table G-35. Wire Fence wilderness inventory area by alternative

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Nine Forest Service System roads cherry stemmed into the area • One Forest Service System motorized trail open to 50 inches or less in the area • Multiple range improvement throughout the area
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Nine Forest Service System roads cherry stemmed into the area • One Forest Service System motorized trail open to 50 inches or less in the area • Multiple range improvement throughout the area
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

Four areas less than 5000 acres and adjacent to existing wilderness – 384 acres

Table G-36. Four areas less than 5000 acres and adjacent to existing wilderness, wilderness inventory areas by alternatives

Alternative	Recommended Wilderness	Rationale
B modified	0	This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas. • Difficulty in identifying boundaries
C	0	Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics. • Difficulty in identifying boundaries
D	0	Responds to comments stating existing wilderness on the Forest is sufficient.

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Appendix H

Response to Comments

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Acronym or Abbreviation	Full Term
CARA	Comment Analysis and Response application (Forest Service)
draft EIS	draft environmental impact statement
EIS	environmental impact statement
final EIS	final environmental impact statement
Forest Service	USDA Forest Service
GIS	geographic information system
NEPA	National Environmental Policy Act
SCC	species of conservation concern
WAQV	Wilderness Air Quality Value

Appendix H. Response to Comments

Introduction

This appendix describes the process used for content analysis of the public comments received by the Forest Service regarding the draft of the Ashley National Forest Land Management Plan (forest plan) and draft environmental impact statement (EIS) and includes issue statements derived from public comments by individuals and organizations and Forest Service responses to the substantive comments received. The comment period was from November 19, 2021, through February 17, 2022. The comment period provided an opportunity for the public to review the forest plan and draft EIS and provide comments and suggested content changes.

During the comment period, a total of 191 comment letters were received. Comment letters were received from representatives from 29 organizations, and the remainder were received from individuals with no affiliation noted. Of the letters received, 90 were classified as unique letters, 8 were duplicates of a unique letter, and 93 were copies of one of two form letters. A total of 986 comments were identified within the comment letters.

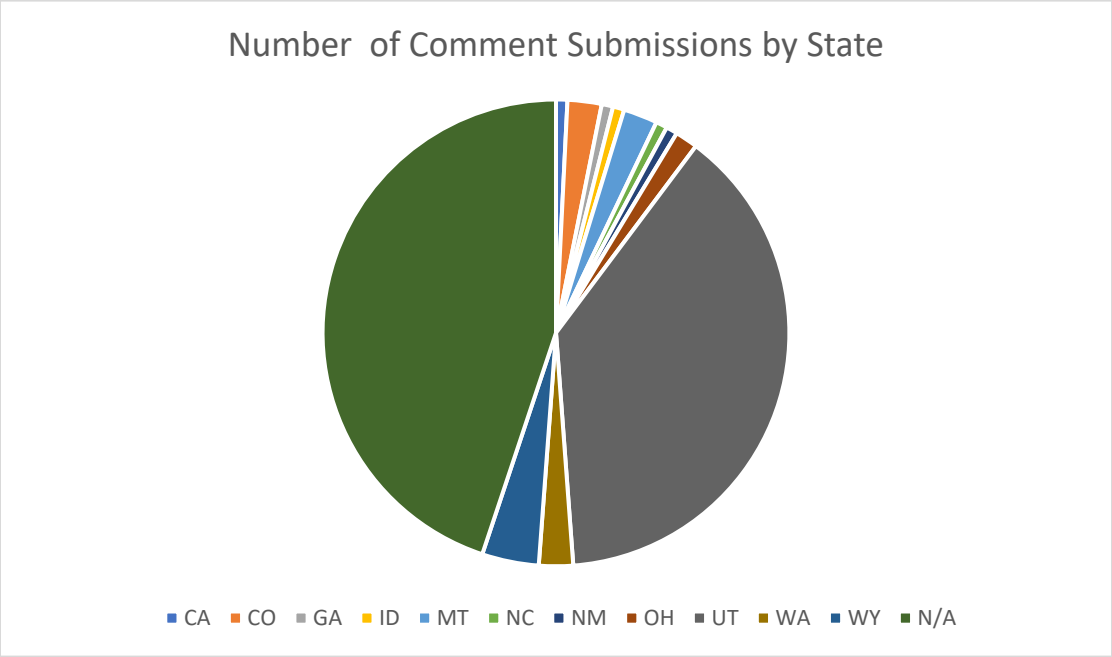
All comments were reviewed and grouped into like concerns, which were summarized as issue statements. For each issue statement, the Forest Service interdisciplinary team prepared a response. Based on these responses, the Forest Service made content changes to the forest plan and draft EIS where appropriate and not in conflict with existing law, regulation, and policy.

Submission Breakdown

Individuals and organizations submitted letters via email, US Postal Service mail, facsimile, and the Forest Service's online Comment Analysis and Response Application (CARA). The Forest Service received 90 comment letter submittals, excluding duplicates and form letters.

Figure H-1 indicates how many letters were received from each state in the United States. Of the letters submitted with addresses, most were from Utah (a total of 49 out of 191 total letters, including unique, master form letters, and form plus letters (i.e. form letters with additional substantive content added) that were entered into CARA. The additional form letter information is kept as part of the planning record files.

Figure H-1. Origin of Letters by Letter Count



Responding Organizations

A large number of organizations responded to the draft EIS and forest plan. Table H-1 provides a list of these organizations as well as their respective CARA letter number(s) and primary contact name listed on the letter.

Table H-1. List of responding organizations and corresponding CARA letter number(s)

Organization	Letter Number	Contact Name
American Rivers	93	Fiebig, Michael
American Whitewater	75	Colburn, Kevin
BlueRibbon Coalition	114	Ben Burr
CTVA Action Committee	135	Anonymous
Duchesne County	24[1]	Hyde, Mike
Flaming Gorge Resort	84	Bair, Woody
Intermountain Economic Consulting, LLC	65	Winterton, Thomas
JRB, LLC	120	Broadbent, Vance
ORBA/USA/U4WD/One Voice	68	Jones, Scott
Rocky Mountain Elk Foundation	101	Decker, Karie
Sageland Collaborative	64	Gardner, Janice
State of Utah	90[1]	Smith, Sindy
State of Wyoming, Office of Governor Gordon	74	Barlow, Kate
The Pew Charitable Trusts	60	Busse, Blake
TPA/COHVCO/CSA/USA/RwR/IRC	113	Jones, Scott
US Department of the Interior	18	Schroeder, Glenn
Uinta County Commissioners	127	Hutchinson, Amanda
Uintah County	62	Cazier, Matt
Uintah County Cattleman's and Farm Bureau	121, 106	Batty, Morgan

Organization	Letter Number	Contact Name
Uintah County Farm Bureau/Cattlemen/Utah Public Lands Council	77	Anderson, Ritchie
United States Environmental Protection Agency Region 8	125	Hubner, Matt
URAT (Uintah Riders All Terrain) Snowmobilers	58	Hatch, John
USDOI, Central Utah Project Completion Act	119	Murray, Reed
Utah Native Plant Society	72	King, Catherine
Utah Snowmobile Association	108	Davis, Michael
Ute Indian Tribe of the Uintah and Ouray Reservation	76	Ute Indian Tribe Business Committee Chairman
Western Resource Advocates	99	Joro Walker
Western Watersheds Project, Wyoming Office	126	Ratner, Jonathan
Wyoming Coalition of Local Governments	128	Bettencourt, Danielle
Yellowstone to Uintas Connection	118	Hamblin, Chad
Yellowstone to Uintas Connection	123	Christensen, Jason

List of Individual Commenters

The table below gives the names of individuals who submitted a letter regarding this project. The list is organized alphabetically by last name. Letters sent anonymously or sent with contact information that was not legible are not included in this list. Letters from commenters who indicated they were associated with a particular organization are included in the count in table H-2, List of responding organizations and corresponding CARA letter number(s). The last column contains the letter number that was assigned to each individual's letter.

Table H-2. List of Individual Commenters and Corresponding CARA Letter Number(s)

Last Name	First Name	Letter #
Adamson	David	12
Badger	Benjamin	28
Bahoravitch	Dirk	85
Bartlett	Floyd	57
Baumgarten	Rob	179
Baumgartner	Greg	105
Beck	Damon	145
Bennett	Wayne	190
Bird	Lori	171
Black	Gregory	155
Blake	Brent	134
Blankenagel	Jason	69
Bloomquist	Kody	169
Brady	Jeff	158
Braegger	Bridgette	138
Bramer	Matt	173
Brendzy	Nicholas	124
Brown	Arianne	82
Brown	Connor	20
Brown	Joel	4, 19

Last Name	First Name	Letter #
Buchanan	Bryce	102
Butler	Sandra	40, 41
Carr	Michael	174
Carter	Alan	36
Child	Travis	189
Cooper	Shelly	185
Cotshott	David	148
Cowdrick	Bob	54
Dahlke	Zachary	191
Darrington	JJ	22
Dean	Rayline	31
Delaney	John	162
DeLogia	Martin	3
Duke	Peter	71
Dykstra	Damon	95
Egan	Donna	56
Esposito	Louis	88
Evans	David A	67
Fabbri	Leigh	59
Fennimore	Jack	157
Fergeson	Cheryl	44
Firestack	Shane	184
Flaugh	Darwin	147
Flint	Shelby	55
Fridrich	Brent	136
Fullen	Richard	178
Graham	Jeff	115
Green	Danny	146
Guilaroff	Jon	25
Guymon	Client	144
Hadlock	Ben	100
Hager	Jon	32
Halasz	Elizabeth	13
Hanamaikai	Heather	83
Hansen	Kirk	97
Hardy	Mark	6
Hayden	Sue	61
Heiser	Jeri	160
Hejlek	Al	129
Hemsley	Lane	70
Hull	Gary	27
Hull	Juanita	26
Humpherys	Kimmy	92
Hurley	Mark	35
Jacobs	Ann	30
Jeffries	T	53
Jenkins	Cody and Gail	45, 46, 122

Last Name	First Name	Letter #
Johnson	Ann	78
Johnson	Ben	133
Johnson	Brian	137
Johnson	Mike	104
Jolley	Elliott	112
Jolley	Michelle	116
Justus	Chad	140
Kendall	Devon	81
King	Catherine	73
Koestner	John	163
Kracl	Jeff	159
Larson	Eric	153
Mauchley	Kevin	117
Maughan	Matthew	23
May	Jonathan	165
McKinnie	Robert	34
Meador	Byron	139
Meier	Scott	182
Merrill	Rex	177
Moore	David	149
Moore	Stan	186
Murphy	Jon	111
Myrin	Nils	110
Neundorfer	Jonathan	166
Neville	Austin	103
Ognibene	Kevin	42
Overstreet	Rosemarie	47
OWinter	Emily	5
Paniagua	Paul	175
Pascua	Sam	181
Pearson	Brandi	39
Perry	Charlie	141
Pham	Dominique	11
Pisani	Steve	87
Powell	Rod	37
Prevedel	Brett	10
Prosienski	Eric	154
Publiee	Jean	1
R	Jennifer	91
Raasakka	Grant	15
Rafferty	Joe	161
Ramsey	Charlton	142
Rankin	William	9
Ranney	Clifford	143
R33aulston	John	164
Raymond	Brian	109
Reynolds	Bret	2, 51

Last Name	First Name	Letter #
Richards	Deborah	38
Riley	Callie	50
Riley	Laura	49
Robins	Josh	168
Rockwood	Katie	96
Rowley	Shane	79
Schaen	Kyle	170
Schumacher	Brandy	48
Seonia	Asher	132
Silbernagel	David	150
Simon	Pete	176
Simpson	Andrew	131
Simpson	Terry	188
Smith	Nathan	7
Sneddon	Diana	152
Spotts	Richard	21
Sringham	Destyn	151
Stocke	Sandra	66
Taylor	Scott	183
Terry	Patty	43
Tester	Joh	14
Tester	John	16
Thomas	Joseph	167
Tockstein	Jennilyn	17
Tockstein	Ryan	89
Topper	William	29
Twitchell	Tamara	52
Uchno	L	63
Van den Broeke	Breanne	86
Vandeweerd	Ray	8
von Mettenheim	Mark	172
Wasif	Alex	130
Webster	Guy	156
Whittingham	Steven	187
Winn	Rose	180
Wise	Barbara	33
Woolever	Phil	80
Young	Clinton	107
Zabriskie	Matt	94

Content Analysis Process

Content analysis is the method used by the Forest Service to gather information about comment letters. The content analysis of the comments on this project was conducted using a systematic process of reading, coding, and summarizing all of the comments that were submitted. This process ensured that every comment was read, analyzed, and considered.

Prior to the start of the comment period, the Forest Service and its contractor collaboratively developed the coding structure used to code comments. This coding structure was then uploaded into the Forest Service's Comment Analysis and Response Application (CARA).

Each submission received was assigned a letter number in CARA. Each submission was then reviewed, and unique comments within a submission were identified in CARA, numbered sequentially, and coded by topic.

All comments within a given topic area were then examined, and themes were developed by identifying similar comments within each topic area. Like comments were then summarized as issue statements and are included in the Responses to Comments by Topic section. For those comments with unique concerns, the issue statements are either a summary or exact replication of the comment. Thus, even though not every comment is quoted in this appendix exactly as written by each respondent, each comment was considered individually.

Some comments were determined to be nonsubstantive and do not have summaries and responses included below. Nonsubstantive comments include those that did not state a specific concern requiring a change or did not include rational for a proposed change.

The interdisciplinary team prepared responses for each issue statement based on its merits, regardless of the source or whether the concern was expressed by one person or by many. The issue statements are followed by the responses prepared by the Forest Service interdisciplinary planning team. Comments and responses are arranged alphabetically according to resource or topic. This appendix documents the Forest Service responses to the substantive comments, which have been addressed, as prescribed in 40 CFR 1503.4, in the following ways:

- modifying the draft forest plan (alternative B modified) and alternatives;
- developing or analyzing alternatives not given detailed consideration in the draft EIS;
- supplementing, improving, or modifying the analysis that the draft EIS documented;
- making factual corrections; and/or
- explaining why the comments need no further agency response.

Resource specialists also reviewed all attachments included with comments, and relevant information was considered in the final EIS analysis and plan component development. Recommended literature identified in comments was also reviewed by interdisciplinary team resource specialists and, where appropriate, citations to the relevant literature have been added to the final EIS and plan and their reference sections.

How to Navigate the Appendix

As described in the Content Analysis Process section above, all comments letters received were reviewed for substantive comments, and the main themes from the comments are included in the Responses to Comments by Topic in the form of issue statements, organized by topic. Forest Service responses to each issue statement are also included in this section.

Issue statements and responses associated with particular organizations can be located by finding the organization name and its letter number in table H-1. Similarly, issue statements and responses associated with letters from individuals can be located by finding the person's name and letter number in table H-2. The letter number can then be cross-referenced with table H-4, which lists the letters associated with each issue statement topic.

Individual comment letters are not included in this report but can be viewed online in the CARA public reading room for this project. Go to CARA public reading room.

Note that some of the plan component abbreviations have been changed between the draft and final versions of the EIS to be more easily recognized. The issue statements use the versions from the draft EIS, and the responses use either the draft or final versions. Table H-3 lists the abbreviations that have changed.

Table H-3. Changes to Plan component Abbreviations Between Draft and Final EIS

Draft EIS	Final EIS	Plan Component
ACC	CLIM	adapting to climate change
AQ	AIR	air quality
ATI	TRIBE	areas of tribal importance
CHR	HIST	cultural and historic resources
CMR	CARTER	Carter Military Road
CS	CARBON	carbon storage and sequestration
EM	MINL	energy and minerals
FI	FIRE	Fire
FIS	FISH	fisheries and aquatic ecosystems
FVA	ASPEN	forest vegetation: aspen
FVC	CONIF	forest vegetation: coniferous forests
FVPJ	PJ	forest vegetation: pinyon-juniper
GL	GD	Guideline
GRH	GEOL	geologic resources and hazards
HRS	STATN	historic ranger stations
IN	ROAD	transportation infrastructure—roads
LGR	GRAZ	livestock grazing
LSO	LAND	land status and organization
LU	LANDSU	lands special uses
NFDS	SHRUB	non-forest vegetation: desert shrub
NFS	SAGE	non-forest vegetation: sagebrush
NFV	VEGNF	non-forest vegetation
NFVA	ALPINE	non-forest vegetation: alpine
NSB	BYWAY	national scenic byways
PARW	RECWIL	preliminary administrative recommendation of wilderness
PHVRA	HVRA	protection of highly valued resources or assets
RECNCG	RECGP	noncommercial group use
RMABRA	RMABACK	backcountry recreation management areas
RMADRA	RMADEST	destination recreation management areas
RMAGRA	RMAGENL	general recreation management area
RUH	RAREHAB	rare and unique habitats—calcareous fens and peatlands
SCE	SCENIC	scenic resources
SE	SOCEC	social and economic sustainability
SO	SOIL	Soils
SR	SWETT	Swett Ranch
TI	TIMB	Timber
TR	TRAIL	Trails
TV	VEGTER	terrestrial vegetation

Draft EIS	Final EIS	Plan Component
TVAR	ATRISK	at-risk plant species
n/a	VEGF	forested vegetation
VEI	VISEDU	visitor education and interpretation
WA	WATER	watershed- and groundwater-dependent ecosystems
WL	WILDL	Wildlife

Responses to Comments by Topic

Detailed issue statements and responses by topic can be accessed by using the hyperlinks in table H-4 for each relevant topic or by navigating to the topic(s) of interest in this section. The topics are listed alphabetically in this section. If you are reading an electronic copy of this document, you may also search by the letter number to find the issue statements and responses associated with each letter.

Table H-4. Issue Statements by Topic and Associated Letters

Issue Statement Topic	Sub-Concern Title (When Applicable)	Associated Letters
Acronyms	—	24
Air Quality	—	24, 62, 72, 76, 99, 123, 125, 128
Alternatives, Including the Proposed Action	—	72, 74, 101, 126
—	Alternative A	74
—	Alternative B	24, 62, 90, 128
—	Alternative C	17, 89, 90, 96, 183
—	Alternative D	23, 37, 51, 52, 58, 70, 76, 97, 107, 110, 113, 117, 183, 108
—	Alternatives Considered but Eliminated from Detailed Study	3, 123
—	Alternatives – New Alternative Proposed	77, 121
—	Alternatives – Range of Alternatives	74, 114, 120, 128, 135
Analysis Methodology	—	74, 123
Appendix B – Comparison of Action Alternative Plan Components	—	74
Appendix C – At-Risk Species	—	64, 72
Appendix D – Persistence Analysis	—	74
Appendix F – Wild and Scenic Rivers Suitability Report	—	75, 93
Appendix G – Recommended Wilderness Report	—	74, 118
Areas of Tribal Importance	—	74, 76
Ashley Karst National Recreation and Geologic Area	—	10, 68, 113
Attachment B – Management Approaches	—	80, 81

Issue Statement Topic	Sub-Concern Title (When Applicable)	Associated Letters
Attachment E – Crosswalks for Ashley Forest Plan Components	—	64
Carbon Storage and Sequestration	—	24, 72, 110, 123
Chapter 1 Purpose and Need for Action	—	24, 62, 128
Climate Change	—	24, 123, 125, 126
Cooperating Agency Relationships	—	127, 128
Consistency with State and Local Plans	—	24, 62, 68, 74, 77, 90, 101, 113, 121, 127, 128
Cultural and Historic Resources	—	24, 62, 74, 123, 125
	Cultural and Historic Resources – Historic Management Areas	128
Designated Areas	—	24, 60, 62, 77, 121
Editorial Comments	—	24, 62, 64, 74, 76
Energy and Minerals	—	24, 62, 74, 99, 128
Endangered Species Act	—	18
Fire and Fuels	—	24, 62, 68, 74, 76, 90, 113, 114, 123, 128, 135, 183
Flaming Gorge National Recreation Area	—	68, 74, 113
Forest Plan	—	64, 72, 74
—	Forest Plan – Plan Monitoring Program	64,74
Government-to-Government Consultation	—	76
Glossary	—	64
Inventoried Roadless Areas	—	128
Land Status and Ownership and Special Uses	—	67
—	Land Status and Ownership and Special Uses – Withdrawn Lands	24, 119
Livestock Grazing	—	24, 45, 62, 64, 67, 72, 74, 77, 79, 90, 101, 110, 111, 120, 121, 123, 126, 128
Maps and Figures	—	24, 62
Migratory Bird Treaty Act	—	18, 64
NEPA Planning	—	64, 74, 128
Nonsubstantive*	—	1, 4, 5, 7, 12, 14, 15, 16, 56, 71, 83, 84, 86, 91, 94, 95, 100, 104, 105, 115, 118
Other	—	113, 125
Planning Rule	—	64, 126
—	Planning Rule – Adaptive Management	125

Issue Statement Topic	Sub-Concern Title (When Applicable)	Associated Letters
—	Planning Rule – Best Available Science/Data	60, 64, 72, 123, 126
—	Planning Rule – Monitoring	123, 125
Public Involvement and Collaboration	—	58
Recreation	—	19, 20, 24, 39, 62, 64, 65, 74, 90, 109, 112, 114, 116, 123, 135, 183
—	Recreation – Backcountry Recreation Management Areas	25, 120
—	Recreation – Destination Recreation Management Areas [DRA]	74, 120
—	Recreation – Dispersed	114, 128, 135
—	Recreation – Motorized	2, 6, 13, 76, 68, 113, 123
—	Recreation – Nonmotorized	58
—	Recreation – Recreation Management Areas	60, 74, 113, 128
—	Recreation – Recreation Opportunity Spectrum	69, 74, 101, 113, 114
—	Recreation – Recreation Special Uses	74
References	—	64
Research Natural Areas	—	118
Scenic Byways	—	24
Scenic Resources	—	24, 62, 74
Social and Economic Sustainability and Environmental Justice	—	24, 62, 74, 90, 114, 123, 125, 135
Soils	—	24, 45, 62, 64, 72, 74, 110, 123, 126, 128
Timber	—	24, 58, 62, 77, 90, 101, 111, 121, 128
Transportation and Facilities Infrastructure	—	24, 114, 123
—	Transportation and Facilities Infrastructure – Facilities	8
—	Transportation and Facilities Infrastructure – Roads	113, 123
Unit Capability	—	
—	Unit Capability – Funding	64, 126
—	Unit Capability – Volunteers	113
Vegetation	—	52, 72, 64, 74, 123, 126, 128
—	Vegetation – Forested	24, 62, 64, 72, 74, 123, 126, 128
—	Vegetation – Other	64, 72, 101

Issue Statement Topic	Sub-Concern Title (When Applicable)	Associated Letters
Watersheds and Aquatic and Riparian Ecosystems	—	24, 45, 62, 64, 72, 74, 90, 99, 123, 125, 126, 128
Watersheds, Aquatics, and Fisheries	—	24, 64, 76, 90, 99, 123, 126
—	Water – Conservation Watershed Network	99, 128
—	Water – Riparian Management Zones	64, 125, 126, 128
Wilderness	—	
—	Wilderness – Wilderness Act	24, 60
—	Wilderness – High Uintas Wilderness Area	24, 62, 90
—	Wilderness – Recommended Wilderness	21, 24, 25, 57, 58, 60, 113, 118, 123, 128
Wild and Scenic Rivers	—	24, 62, 75, 93, 128
Wildlife and Plants	—	11, 24, 60, 62, 64, 74, 123, 126, 128
—	Wildlife – Aquatic Species	74, 123
—	Wildlife – Terrestrial Species	18, 24, 25, 60, 62, 64, 74, 101, 123
—	Wildlife – Bighorn Sheep	24, 90, 62, 64, 74, 120, 126, 128
—	Wildlife – Canada Lynx	18, 123
—	Wildlife – Eureka Mountainsnail	64
—	Wildlife – Pygmy Rabbit	64, 74

* No issue statements or responses are included in this report for nonsubstantive comments

Acronyms

Letter number 24

Issue Statement

1. The Forest Service should make the following changes to the acronyms:

   - The acronym “AMP” should be included in the list of acronyms on pages vii–viii of the draft EIS.

   - Table 2-2 and pages 207, 210, 247, 249, 250, 251, 252: The acronyms ERUs and HMs are not listed in the acronyms listed on pages vii–viii of the draft EIS.

   - Micrometers is used rather than “microns” in defining particulate matter on page viii.

   - The acronym CHHR (core herd home range) is not listed on page vii along with other acronyms used in the draft EIS.

Response

1. In the final EIS, these terms are either spelled out whenever used or have been added to the list of acronyms and abbreviations. Micron has been changed to micrometer.

Air Quality

Letter numbers 24, 62, 72, 76, 99, 123, 125, 128

Issue Statements

1. The Forest Service should monitor Wilderness Air Quality Values or Air Quality Related Values for Class I Wilderness Areas, Wilderness Areas, and other Class II areas. Analysis of sensitive receptors should be incorporated to ensure management decisions safeguard Wilderness Air Quality Values or Air Quality Related Values. The scope of the two sensitive receptors discussed in the draft EIS (water and flora) is not designed to identify and address air pollution impacts, nor does the Forest Service explain whether it has undertaken monitoring and analysis of these receptors.

2. The Forest Service should establish objectives, standards, and guidelines to help produce the desired condition of the annual deposition of air pollutants being below published critical loads or levels for targeted resources on the Ashley National Forest.

   The following objectives are suggested:

   - Within two years of plan approval, designate a full range of Wilderness Air Quality Values (WAQVs) and corresponding sensitive receptors for the High Uintas Wilderness Area, design and implement a protocol for monitoring the WAQV sensitive receptors, and establish baseline conditions of the sensitive receptors.

   - Within four years of plan approval, designate WAQVs and corresponding sensitive receptors for two additional representative Class II Forest areas, design and implement a protocol for monitoring the WAQV sensitive receptors, and establish baseline conditions of the sensitive receptors.

   - Within two years of identifying an adverse impact on an Air Quality Related Value or WAQV, design and implement a plan to remediate the impairment and to restore the structure or function of an ecosystem value or the quality of the visitor experience.

   The following standard is suggested:

   - The Forest will prevent and remediate human caused impairments to Forest AQRVs and WAQVs, visibility, flora, fauna, soils, and aquatic resources.

   The following desired condition is suggested:

   - Air quality in Forest Class II airsheds fully support AQRVs, WAQVs, visibility, flora, fauna, soils, aquatic resources, and air pollution, including ozone, particulate matter, and deposition of nutrients, acids, and toxics, does not harm Forest ecosystem resources.

3. The Forest Service should eliminate or minimize emissions, including fugitive dust and greenhouse gases, from Forest activities.

   The Forest Service should include the following guideline:

   - The Ashley National Forest will manage activities, actions and projects on the Forest to eliminate or minimize to the greatest extent possible emissions of air pollution, including fugitive emissions and greenhouse gases, including by requiring appropriate design features and best available mitigation and control measures and technology.

4. Managing any certain percentage of wildfires or natural ignitions (10 percent in the case of the forest plan) over 10 years is not environmentally sound because wildfires have a large negative impact on air quality.

5. Recommended edits related to the discussion of air quality affected environment and impacts include the following:

   - On page 32: ". . . a 70-acre portion of the Ashley National Forest north of Vernal is at the northeast extreme of this nonattainment area boundary."

   - On page 36: "The Ashley National Forest is in conformance with each of the National Ambient Air Quality Standards, except for 70 acres that fall within the northeast boundary of the Uintah Basin marginal ozone nonattainment area."

   - On page 38: "Emissions in the 70-acre portion of the Ashley National Forest that lies in the northeast boundary of the Uintah Basin marginal ozone nonattainment area would be similar to those that currently occur."

   - On page 39: "Under all alternatives, vegetation and fuels treatments would be used, in varying degrees, to reduce tree density and the quantity of surface fuels and to remove insect-affected trees, which, in turn, would lower the risk of severe wildfire."

6. The combined effects of sediments from watershed uses such as roads, all-terrain vehicles/off-highway vehicles/over-snow vehicles, grazing, and logging are not addressed in any analysis in the draft EIS. The contribution of hazardous pollutants to the air and watersheds should also be evaluated. The Forest Service should use Environmental Protection Agency models and emission factors to determine the impacts on the environment and exposures to cross-country skiers and snowmobilers from off-highway vehicles.

7. The draft EIS should identify existing and approved unconstructed oil and gas wells in the Ashley National Forest and include analyses of air quality impacts from these. The Forest Service should discuss activities such as the Uinta Basin Railway and mines (existing, approved, or proposed) and include these sources as part of the environmental consequences of the alternatives.

8. The results of existing air quality monitoring data should be presented in a table or figure as a trendline.

9. Much of the pollution that impacts air quality originates from outside the Forest. The Forest Service should include a desired condition for air quality that is generally clean and free of pollution originating within the Forest and in which natural air emissions dominate the pollutant regime. This desired condition should express that the Forest works with all nearby partners

(federal, state, municipal, and private) to minimize the impacts of pollutant transport affecting the Forest.

10. The qualifier regarding short-term impacts from wildland fire should be removed. The desired condition for air quality should include minimal impacts to air quality from fire.

11. Critical loads should be used as guidelines or standards by which the Forest Service can determine if the desired condition of nitrogen and sulfur deposition is being met.

12. The Forest Service should modify desired condition FW-DC-AQ-04 to include the natural fire regime as the desired condition because historic fire regimes may have been anthropogenically suppressed compared to natural conditions.

13. The FL-GL-AQ guideline should be used to define how the Forest will determine if a management action or project requesting Forest approval will determine potential air quality impacts. The guideline should state that activities generating emissions will be identified and that emissions will be calculated using an emissions inventory. If there are any exceedances of standards or guidelines, the Forest Service should implement emission reduction strategies to reduce the impact or not approve the action. Emission reduction strategies could include cleaner equipment, cleaner fuel, zero-emitting equipment, add-on control technologies, and reducing the pace or scope of the action.

14. The forest plan should include guidelines for visibility and deposition to inform whether current conditions are met. These could include Regional Haze Reasonable Progress metrics or metrics developed by the Federal land managers to help address visibility.

    Suggested guidelines are:

    - The Forest will include mitigation for projects that may contribute 0.5 deciview reduction in visibility to prevent visibility degradation.

    - The Forest will apply mitigation or disallow projects that would contribute 1.0 deciview or more and would thereby cause visibility impairment.

    - If a project would exceed the nitrogen and sulfur Deposition Analysis Threshold (DAT), the Forest will conduct additional analyses to understand the relevance of the impact, including but not limited to whether the area is exceeding or projected to be exceeding critical loads. The Forest will apply mitigation or project modifications to prevent exceedances of the DAT and critical loads.

15. The forest plan should establish a guideline for fugitive dust resulting from unpaved roads, heavy machinery, and earth-moving activities to ensure that fugitive dust does not create impacts on health, safety, or attainment of the National Ambient Air Quality Standards or Air Quality Related Values guidelines.

16. The Forest Service should establish a guideline or management approach to reduce greenhouse gas emissions from authorized activities to the lowest practical levels.

17. The forest plan should include a standard that projects should not be approved if they are projected to violate or contribute to a violation of National Ambient Air Quality Standards. The

standard can utilize the currently proposed language from FW-DC-AQ-01 that ambient air quality across the Forest complies with Federal and State standards and air quality management plans.

18. On page 30 in Chapter 3, an introductory paragraph should be created to describe what is included in this section; the last sentence of paragraph 4 on page 31 would be better placed as an introductory sentence at the beginning of this section.

19. The Forest Service should work to minimize emissions near the 70-acre portion of the Forest that lies in the northwest boundary of the marginal ozone attainment area under all the alternatives since pollutants do not adhere to boundaries and can settle in the Uinta Basin, contributing to worse air quality issues.

20. The Forest Service should include an objective that oil and gas leasing analyses will include analyses of air quality impacts, including greenhouse gas emissions, resulting from existing and potential future oil and gas development over the life of the forest plan.

21. The Forest Service should make specific text changes to address discussion of differences between alternatives in terms of impacts from vegetation and wildland fire management on air quality. Suggested changes include the following:

    - On pg. 213, the text states that "Impacts under alternative C would be similar to those described under alternative B. Due to a reliance on natural processes, short-term impacts from use of prescribed fire would be reduced compared with other action alternatives; however, emissions would occur from use of managed wildland fires." Under this alternative, the risk of uncharacteristic wildfire and associated health impacts from emissions would be greater than under alternative B due to the restrictions on active vegetation management in alternative C.

Responses

1. No Class 1 Wilderness areas are located on Ashley National Forest. Chapter 4 in Appendix E of the draft EIS (plan monitoring) lists potential data sources to mark trends in air quality. The plan monitoring program is not intended to depict all monitoring, inventorying, and data gathering done on the Ashley National Forest or to limit monitoring to just the questions and indicators listed in table 21. As a matter of policy, Forest air monitoring plans and designation of sensitive receptors for Wilderness Air Quality Related Values are established and revised outside of forest plan revision intervals. Table 3-2 in the draft EIS depicts current Wilderness Air Quality Related Values and Sensitive Receptors for the High Uintas Wilderness. The planning team considered the comment but chose to retain the existing language. Air management approaches 01 and 03 describe actions/coordination to minimize short-term smoke impacts, tiered to the desired condition statement.

2. The suggested objectives were considered but the planning team did not choose to adopt them. As a matter of existing policy, Forest air monitoring plans and designation of sensitive receptors for Wilderness Air Quality Value (WAQRVs) are established and revised outside of forest plan revision intervals. Table 3-2 in the draft EIS depicts current WAQRVs and Sensitive Receptors for High Uintas Wilderness. No Class I wilderness areas are located on the Ashley National Forest. High Uintas WAQRV and sensitive receptors are already established for a Class II area. Because of the nature of air quality, most source areas are beyond jurisdiction of the Forest Service. The role of the Forest Service includes monitoring and coordinating with external agencies. FW-GD-AIR-01 and air management approaches 01–04 in the draft plan discuss cooperative actions the

Forest Service can do to coordinate with other agencies related to emissions generated on the Forest. The planning team considered the suggested desired condition statement but did not adopt it, determining that the suggested topics were covered in the current wording of FW-DC-AIR-01, 02, and 03.

3. Updated language on emissions control strategies has been incorporated in the forest plan in guideline FW-GD-AIR-01. The selection of project-specific practices for fugitive dust is addressed by guideline FW-SOIL-GD-05.

4. While all fires do produce emissions, the recent literature generally demonstrates reduced long-term emissions from prescribed fire compared to subsequent large wildfire events (e.g., EPA/600/R-21/197). Prescribed fires and strategic and safe management of wildfires are designed to reduce the potential for severe fire damage by changing the behavior of a subsequent wildfire and making it easier to manage or to meet social and ecological objectives. The Air Quality discussion in the draft EIS (pp. 40–41) does disclose potential differences in short-term emissions related to fire and fuels treatments between the alternatives.

5. Corrections have been made reflecting the comments.

6. The suggested level of detail is outside of the programmatic scope of air analysis for forest plan revision. The watershed section of the draft EIS (pp. 67–84) discusses potential effects from recreation (including vehicle use). Vehicle use is mentioned in the Air cumulative effects section (p. 42). Detailed emissions inventories of the scope suggested are requirements in project-specific NEPA with potential emissions on a scale to demonstrate compliance with the Prevention of Significant Deterioration and General Conformity Rules.

7. Updates have been made to the cumulative effects section of the EIS in response to this comment.

8. Additional tables and figures have been added to the EIS based on comments.

9. Language similar to this suggestion appears in air quality desired condition statements 01–04 of the draft plan. Air quality management approaches 01 and 04 in the draft plan discuss collaboration with outside agencies to minimize pollution generated on the Forest. Regulation of pollutants generated off the Forest is beyond the jurisdiction and scope of a programmatic land management plan.

10. The planning team considered the suggestion to remove the qualifier but chose to retain the existing language. Air management approaches 01 and 03 in the draft plan describe actions and coordination made to minimize short-term smoke impacts, tiering to the desired condition statement; modification was made based on this comment.

11. The planning team considered this comment but chose not to establish it as a standard. It is listed in the draft plan (Chapter 4, Plan Monitoring) as a potential monitoring tool to determine the risk of effects to sensitive receptors from air deposition. It also appeared in air quality management approach 04 of the draft EIS.) The science and technology of air quality monitoring is rapidly advancing, and it is likely that new protocols will be developed and accepted over the life of the Ashley National Forest's land management plan.

12. A modification was made based on comments.

13. Language modification was made to FW-GD-AIR-01 based on comments.

14. Language modification was made to FW-GD-AIR-01 and air management approach 04 based on comments. The recommended analysis for specific project proposals is already a requirement under project-level NEPA analysis, demonstration of prevention of significant deterioration (PSD) and adherence to the General Conformity Rule.

15. Design features for dust abatement are usually determined at the project level. In the plan and its alternatives, selection of management practices for fugitive dust would be addressed under guideline FW-SOIL-GL 05 regarding soil displacement/erosion. Existing policy on dust abatement also exists in Forest Service handbooks for road construction and maintenance (e.g., Forest Service Handbook 7709.56 chapter 40, 7709.59 chapter 60). Additional language for a management approach on fugitive was considered but decided against.

16. The planning team considered this suggestion but did not adopt it. Council on Environmental Quality guidance on greenhouse gas emissions has not been issued. No law or regulation is in place.

17. This is performed as a matter of adherence to existing policy, laws, and regulation. Large projects with more than de minimis emissions would require use modeling and other determinations to show compliance with existing National Ambient Air Quality Standards and other Environmental Protection Agency regulation. Project-specific EIS analysis would cover this. This topic also appears in FW-GD-AIR-01 and air quality management approach 04.

18. The planning team noted this comment but chose to retain the suggested passage in the section that reviews the regulatory framework for air quality.

19. Under the General Conformity Rule of the Clean Air Act, Federal agency actions should not cause or contribute to exceeding ambient air quality standards that could impede Federal or State demonstrations of reasonable progress toward air quality goals. This would apply to nonattainment areas. Desired condition statements FW-DC-AIR-01 through 04 reflect this. FW-GD-AIR-01 has been revised to include potential emission reduction strategies that can be considered where project emissions are identified as a potential concern. Air management approaches 01 and 04 also describe cooperating with outside agencies and pursuing best management practices to reduce pollution.

20. An updated oil and gas leasing analysis is not a part of the Ashley forest plan revision. The recommended air impact analysis would be performed as existing policy requirements of the National Environmental Policy Act, demonstration of prevention of significant deterioration and the General Conformity Rule during new leasing analysis and during project specific Oil and Gas proposals.

21. This passage has been modified based on comments.

Alternatives, Including the Proposed Action

Letter numbers 72, 74, 101, 126

Issue Statements

1. Table 2-2 should compare the number of permitted head months and animal unit months permitted in destination recreation management areas, including the number reduced under alternative C.

2. The Forest Service should compare current conditions to the desired conditions under the four alternatives using side-by-side formatting. Overall, the alternatives should incorporate more information about native plant material, socioeconomics, and recreation.

3. The Forest Service should implement a combination of alternatives B, C, and D for fuels treatments; more specifically, the component of Alternative D, to treat 10,000–40,000 acres to improve or maintain desired vegetation conditions, and the components of Alternatives B and C, to manage at least 10–20 percent of natural, unplanned ignitions to meet resource objectives.

4. The Forest Service should consider updating the alternatives using components of the Manti-La Sal conservation alternative, which can be found at https://www.mantilasalconservationalternative.org/.

Responses

1. The information selected for inclusion in the comparison of alternatives table 2-2 is not meant to be exhaustive. The livestock grazing measures included for comparison are livestock forage utilization and stubble height guidelines, permitted head months, and permitted grazing in acres. An animal unit (AU) is generally one mature cow of approximately 1,000 pounds and a calf as old as six months, or their equivalent, whereas an animal unit month (AUM) is the amount of forage required by one animal unit for one month. The data we have included in the table meets the purpose of comparing the merits of the alternatives for grazing. In chapter 3, table 3-72 displays the acres of permitted grazing in destination recreation management areas under alternative C.

2. The Forest Service has presented the environmental impacts of the proposal and the alternatives in comparative form, including an overview and side-by-side comparison of the key elements of the alternatives in chapter 2. In chapter 3. Affected Environment and Environmental Consequences, the affected environment describes the current condition for each resource section as well as the environmental consequences by alternative. Due to the complexity of the analysis, we feel this standard approach is the preferable format. In addition, Appendix B of the EIS, Comparison of Action Alternative Plan Components, provides side-by-side comparison of how the wording of plan components varies by alternative.

   The EIS includes updated information about socioeconomic impacts of the plan. The plan and EIS address the use of native plant materials; refer to the response to Vegetation #8 for additional information. At-risk species are addressed throughout the plan (see Appendix D to the EIS for a crosswalk for at-risk species (wildlife, fish, and plants) and pollinators. An overview of how at-risk plant and wildlife species are addressed is in chapter 2 under Elements Common to all Alternatives.

3. The Forest recognizes the advantages of blending certain elements of the different alternatives. In response to public comments, alternative B modified has been selected as the preferred alternative. Alternative B does include elements of alternative D (refer to appendix B of the final EIS for how the plan component wording varies by alternative). The objective FW-OBJ-FIRE-01 from alternative B was determined to be an appropriate objective although the wording has been revised to clarify that approximately 6,600 to 32,000 acres of vegetation treatments will occur annually, a range that is based on historical disturbance regimes by vegetation types. Objective FW-OBJ-FIRE-02, which states “Every 10 years, manage natural unplanned ignitions to meet

resource objectives associated with the vegetation types (table 9) on at least 10 percent of the ignitions," is included in alternative B modified.

4. The Forest Service appreciates the efforts behind the development of the Conservation Alternative for the Manti-La Sal National Forest (October 2020).[1] The planning team reviewed the Conversation Alternative and found that the management direction in alternative C, as well as components of alternative B modified, reflected in the plan, are consistent with the goals of the Conservation Alternative. Making changes to alternatives based on the Conservation Alternative did not occur at this stage of the Ashley plan revision process. The Ashley National Forest initiated revising the plan in 2016, published the Ashley National Forest Assessment and supplemental reports in 2017, and released preliminary documents, including the draft land management plan for scoping comment, in 2019. The Ashley National Forest addressed comments from scoping and developed alternatives prior to the release of the Conservation Alternative. Comments specific to the revised plan and alternatives have been reviewed, and determinations as to whether and how to modify plan direction, the alternatives, and/or analysis are detailed in this appendix as well as in the final EIS.

Alternative A

Letter number 74

Issue Statement

1. The Forest Service should identify the number of acres of designated areas remaining under alternative A.

Response

1. The Designated Areas section of the EIS includes the acreages of designated areas that are common to all alternatives, including the no-action alternative A. The discussion of the environmental consequences for wildlife common to all alternatives includes a section titled Effects from Designated Areas, which gives the acres of designated areas.

Alternative B

Letter numbers 24, 62, 90, 128

Issue Statements

1. The Forest Service should include language about consulting with state wildlife agencies for bighorn sheep management in the description of alternative B in chapter 2 of the EIS.

2. The draft EIS should disclose and discuss the environmentally significant impacts of proposed management by wildfire and add flexibility to suppress fires in wilderness areas.

3. The Forest Service should adopt a more flexible, adaptive management approach for alternative B, such as is proposed in Alternative D, as well as indicate which exceptions or on-site modifications are permitted.

[1] This is available at https://www.mantilasalconservationalternative.org/.

4. Restricting timber supplies under alternative B could reduce watershed water quantity, impacting local water supplies.

Responses

1. The Forest Service does intend to coordinate wildlife management with Federal, State, and local agencies, Tribes, and adjacent landowners (see FW-GO-WILDL-01, 02, and 03). The description of alternative B in chapter 2 accurately describes how management direction in alternative B varies from the other alternatives.

2. Environmental impacts from wildfire are discussed in other resource areas. Suppressing wildfire in wilderness is possible, but suppression tactics are limited due to wilderness rules. Changing these rules is outside the scope of this draft EIS and plan revision.

3. All views were carefully considered during development and evaluation of the alternatives in the forest plan process. The revised plan alternatives represent a range of possible management options. Each alternative emphasizes specific land and resource uses and deemphasizes other uses in response to the issues used for alternative development. Information presented in chapters 2 and 3 of the EIS provides the basis from which to evaluate the comparative merits of the alternatives. In addition, all of the alternatives follow adaptive management principles outlined in the planning rule directives (Forest Service Handbook 1909.12, zero code 06.1 and 06.2). An example of the adaptive approach related to livestock grazing management is adjusting the timing, intensity, and rotation patterns on the allotment based on resource conditions.

4. The revised plan includes acres suitable for timber production. There are additional acres where timber harvesting could occur, which differs from timber production (refer to the plan glossary for additional information). The projected timber harvest levels indicated in appendix C include harvest from lands that are not suitable for timber production. This includes harvest that may occur in the inventoried roadless areas. The location and level of timber harvest treatments are determined according to desired resource objectives other than timber production. The revised plan contains management direction to support managing for high water quality, healthy riparian areas and wetlands, healthy forests, and watersheds resilient to drought and disturbance, which in turn provide beneficial uses on the Forest and downstream.

Alternative C

Letter numbers 17, 89, 90, 96, 183

Issue Statements

1. Alternative C increases the recommended wilderness areas, which could cause problems for managing and maintaining infrastructure in wilderness areas.

2. The high amount of scenic integrity objectives acres in alternative C would likely impact the Forest Service's multiple-use mandate and local resource management plan policies, particularly energy transmission.

3. The Forest Service should adopt the annual review for easements under alternative D in alternative C.

4. The Forest Service should modify alternative C to severely limit or close winter uses and further look at recreation impacts while complying with the Wilderness Act of 1964. The Forest Service

should not choose alternative C because it restricts too much access for users. The Forest Service use of recreation management areas serves as buffers to the wilderness areas.

5. The Forest Service should modify alternative C to manage vegetation based on the following recommendations, among others: update livestock grazing capability, suitability, and stocking rates; use science-based standards; and monitor riparian areas.

6. Alternative C would decrease the motorized and nonmotorized trail systems compared with alternative B and would restrict wheeled motorized travel in backcountry recreation management areas, which would discriminate against those with mobility-related disabilities.

7. The Forest Service should implement the backcountry recreation opportunities and protection for wildlife, watersheds, and native flora under alternative C.

8. The Forest Service should edit chapter 2 of the EIS to remove the statement that increased restrictions on resources uses, such as timber, would support ecosystem services associated with clean water, including municipal water supplies. Restricting timber harvest may enhance water quality but would likely reduce the quantity of water produced by a watershed, which would negatively impact municipal water supplies.

Responses

1. The decisionmaker carefully considered a range of recommended wilderness areas, from 50,200 acres in alternative C to no acres in alternative D, as well as other allocations, to determine the mix of land and resource uses that would best meet public needs. The areas being recommended for wilderness are all within inventoried roadless areas with few maintenance needs for infrastructure.

2. The revised plan alternatives represent a range of possible management options. Each alternative emphasizes specific land and resource uses and deemphasizes other uses in response to the issues used for alternative development. The responsible official considers all points of view in making the decision and will strive for an appropriate mix of multiple uses and proper management of all resources. Alternative C would increase the number of acres in areas where the management emphasis would maintain or enhance the valued scenic character. This is because 74 percent of the lands would have very high scenic integrity objectives (assigned to designated wilderness and recommended wilderness) and high scenic integrity objectives (assigned to high- and moderate-concern-level travel ways, recreation sites, and cultural and historic sites). The Lands Special Uses section of the plan includes the following: Special use authorizations authorize the occupancy and use of National Forest System lands by private individuals, organizations, companies, governmental entities, educational institutions, etc., for a wide variety of uses. Such uses include roads, dams, water systems, utility corridors, communication sites, and other private or commercial uses that cannot be accommodated off National Forest System lands and that conform to management direction for the area. Requests for occupancy and use of National Forest System lands must be submitted as a proposal, which is a request to use National Forest System lands. The proposal must pass a two-level screening process to determine if the proposed use is consistent with Forest Service policy before it can be accepted as a formal application.

3. The plan component language by alternative was developed to demonstrate a range of alternatives for analysis in the draft EIS. The focus of alternative D is accomplishing desired conditions by shared funding and cooperation with partners, whereas alternative C emphasizes the use of passive management. The objectives related to how easements are prioritized reflect the different

emphases in the alternatives, with alternative D (FW-OB-LU) annually prioritizing easements identified and agreed upon by state and county governments and private landowners for providing access to the national forest, whereas alternative C (FW-OB-LU) considers and prioritizes easements identified and agreed upon by state and county governments and private landowners for providing access to the national forest every five years. The preferred alternative, B modified, does not have a similar objective but does have a goal (FW-GO-LAND-01) that states: "The Ashley National Forest works with local, county, and State governments, adjacent land management agencies, and landowners to identify and acquire road and trail easements as necessary."

4. The Forest recognizes that there are many different ideas and opinions on how the Forest should be managed and how the assortment of multiple uses of the Forest should be applied across the landscape. The final EIS considers a broad range of alternatives that emphasize different uses that may be conflicting, such as one that includes more backcountry and recommended wilderness management area allocations (alternative C) and others that include less. The forest plan provides strategic guidance; no decisions will be made regarding the regulation of public activities and access to Federal lands or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The recreation management areas are not intended to act as "buffers" to designated areas; rather, creation of these management areas would allow for further refinement of management for different uses and would address specific areas where many different recreation activities are concentrated. This would balance developed recreation opportunities and settings with opportunities for backcountry activities. Alternative C places a greater emphasis on backcountry recreation management areas, which are focused on dispersed recreation outside wilderness areas with limited infrastructure. These management areas would manage for dispersed recreation opportunities and would establish management for roadless lands that have high conservation value.

5. Although alternative C was not modified, the preferred alternative, B modified, was revised in response to comments and includes updated direction related to livestock grazing. Refer to the Livestock Grazing section below for more detailed information, as well as the description of the preferred alternative in chapter 2 of the final EIS that outlines the updated plan direction.

6. The Forest considers a range of alternatives in detail in the final EIS. Each alternative emphasizes specific land and resource uses and de-emphasizes other uses in response to the issues used for alternative development. This is primarily done by changing management area allocations, resulting in comparisons of the merits amongst the alternatives. The Forest Service recognizes that restrictions on motorized transport in alternative C may result in site accessibility difficulties for those who require motorized transportation.

7. The Forest Service recognizes that there are many different ideas and opinions on how the Ashley should be managed and how ecosystem services should be considered along with multiple uses across the landscape. The final EIS considers a range of alternatives that emphasize different uses. For example, alternative C includes more backcountry recreation and recommended wilderness management areas while others include no additional recommended wilderness and have more lands that are suitable for timber production (alternatives B modified and D). All alternatives recognize that vegetation management, including timber harvest, is an important tool to help achieve the desired conditions specified in the forest plan, both ecological (such as wildlife habitat and forest resilience) and social and economic (such as providing wood products and employment). Alternative B modified, selected as the preferred alternative, strives to set an

appropriate mix of management areas while at the same time affording management flexibility to achieve other forestwide desired conditions.

8. By managing for the health of forest ecosystems, the Ashley National Forest directly contributes to regional water quality and helps reduce financial costs associated with the quality of water supplies. As stated in chapter 3, in the section titled Overall Watershed Condition, several municipalities have source water protection areas that include large portions of the Ashley National Forest. The Forest Service manages these headwaters to protect drinking water supply downstream, based on the Utah Department of Environmental Quality Division of Drinking Water's requirements. Alternatives B, C, and D include plan components to protect water quality in these areas, including objectives for restoration and vegetation treatments to improve the condition of these watersheds and reduce the risk of uncharacteristic wildfires. As stated in chapter 3, under Environmental Consequences for Social and Economic Sustainability: "Alternative C could result in improvement to watershed conditions for municipal watersheds and aquatic habitat as a result of a potential to decrease road-related water quality impacts. This is due to a decreased emphasis on motorized use and a reduction in mechanical vegetation treatments. Prescribed burning would continue to affect watershed conditions. Using wildland fire as a management tool could increase the potential for high-intensity fires in some areas, which could affect hydrological processes and water quality. Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with alternative A." The planning team has modified the statement in chapter 2 describing alternative C as follows "Ecosystem services associated with clean water could benefit from the decreased emphasis on motorized use and a reduction in mechanical vegetation treatments."

Alternative D

Letter numbers 23, 37, 51, 52, 58, 68, 70, 76, 97, 107, 108, 110, 113, 117, 183

Issue Statements

1. Alternative D would allow for the most flexibility to manage and establish infrastructure in the Forest and manage wildfire threats.

2. The Forest Service should open additional areas to off-highway vehicles under alternative D and explore and incorporate additional recreation access from alternative B.

3. The Forest Service should prohibit maximum timber harvesting and protect the Ute Indian Tribe's water resource under all alternatives.

4. All alternatives except alternative D conflict with the National Trails Strategy, and the Forest Service should expand recreation access.

5. The Forest Service should examine the analysis of alternative D in chapter 3 on page 288, which claims that impacts would be minimal, in contradiction to the information provided regarding acreage impacts, the recreation use impacts, and other expected outcomes.

6. Active management of the Forest to provide long-term viability for the watersheds is recommended. It is important to note that alternative D would focus wildfire suppression tactics around resources such as watersheds, best protecting such valuable water. Active management

proposed in alternative D would best protect the landscape from wildfire, thus protecting watersheds.

7. The Forest Service should implement alternative D due to increased motorized forest access and developed recreation opportunities as well as related economic benefits.

8. Alternative D is more responsive to cooperating agency concerns.

Responses

1. Although alternative D was not selected as the preferred alternative, important components of this alternative were incorporated into the preferred alternative, B modified. As commenters noted, alternative D would allow for the most flexibility to manage and establish infrastructure in the forest and manage wildfire threats. Alternative B modified has flexible management approaches for active fire management that strives to balance the natural role of fire while minimizing the negative impacts on watershed health, wildlife habitat, highly valued resources or assets, and air quality.

2. The Forest Service recognizes the advantages of blending certain elements of the different alternatives. In response to public comments, alternative B modified has been selected as the preferred alternative, with additional recreation access in more areas identified as general recreation management areas. The forest plan does not make travel management decisions, which are separate, project-level decisions that determine the specific areas and routes for motorized recreation consistent with areas identified in the plan as suitable for motorized recreation use. The forest plan does not authorize site-specific prohibitions or activities; rather, it establishes broad direction, similar to zoning in a community. Project or activity decisions will need to be made following appropriate procedures. For example, site-specific analysis in compliance with the National Environmental Policy Act will need to be conducted in order for prohibitions or activities to take place on the ground, in compliance with the broader direction of the forest plan.

3. The Forest Service manages the harvest of timber and forest products to protect the sustainability of national forests, as well as their associated watersheds. The Forest Service recognizes the critical role of National Forest System lands in providing downstream water resources and groundwater for local communities, including the Ute Indian Tribe. Alternative B modified was selected as the preferred alternative, reflected in the forest plan, and has 114,300 acres (8%) of National Forest System lands on the Ashley National Forest are suitable for timber production. EIS sections Areas of Tribal Importance and Cultural and Historic Resources analyze the effects of timber harvesting on tribal interests and resources under all alternatives. The forest plan establishes desired conditions and other guidance for watershed management, including the Watershed Condition Framework as the approach for identifying target watersheds for restoration and for the development of restoration action plans. Identified priority watersheds are Whiterocks River, Wolf Creek, and Cart Creek. The Watershed Condition Framework process will include tribal engagement to identify new priority watersheds as well as in the development of restoration action plans.

4. As noted in the Recreation section of the EIS, part of the regulatory framework is the National Trails System Act of October 2, 1968 (Public Law 90-543, 82 Stat. 919, as amended), which established the National Trails System and authorized planning, right-of-way acquisition, and construction of trails established by Congress or the Secretary of Agriculture. The Ashley National Forest offers a variety of motorized and nonmotorized trail-based recreation on

approximately 1,200 miles of trails. Trail-based motorized travel is restricted to 185 miles of trails designated for motor vehicle travel. Some trails have seasonal limitations to protect natural resources, such as wildlife or riparian areas. The Forest Service intends to continue working with our partners to expand motorized trail opportunities. The preferred alternative B modified includes objectives to improve 2 miles of motorized trails every 3 years, if local user groups are available to assist in improvement work. Note that travel management decisions are separate, project-level decisions that determine the specific areas and routes for motorized recreation consistent with areas identified in the plan as suitable for motorized recreation use. The forest plan does not authorize site-specific prohibitions or activities; rather, it establishes broad direction, similar to zoning in a community. Project or activity decisions will need to be made following appropriate procedures. For example, site-specific analysis in compliance with the National Environmental Policy Act will need to be conducted in order for prohibitions or activities to take place on the ground, in compliance with the broader direction of the forest plan.

5. It is important to review the entire section related to a resource in the EIS for a better understanding of the analysis, as well as relevant sections in other resource sections. Additionally, as stated in the EIS: "For the forest plan revision, management direction that may lessen or worsen threats to recreation is evaluated at a programmatic level. The forest plan does not authorize site-specific projects or activities; therefore, there are no direct effects from adopting the forest plan. Direct and indirect site-specific effects will be further analyzed when future projects are proposed. Although potential short-term consequences may be described where appropriate from implementing the programmatic approach, this evaluation focuses on longer term indirect and cumulative effects that may occur over the 10- to 15-year life of the forest plan." The section on the recreation environmental consequences for alternative D notes that "impacts would be similar to those under alternative B; however, there would be an even greater emphasis on general recreation areas and destination areas, as opposed to backcountry recreation."

6. As noted in the comment, under alternative D more acres would be treated through mechanical and prescribed fire fuels treatments, with a focus on protection of highly valued resources or assets. Areas of the plan that focus on shared stewardship and use of partnerships to achieve objectives include fire and fuels management. Through collaboration with partners, the Forest Service would seek to achieve the higher-end levels of anticipated vegetation treatment per year to minimize risks from uncharacteristic wildfire in local communities and in prioritized landscapes. If there is conflict between the need to mitigate hazardous fuels to protect critical values, particularly human improvements, and other natural resource concerns, alternative D would favor protecting those critical values. Alternative D also has the fewest restrictions on timber harvest, with the most acres suitable for timber production and the greatest harvest volume. Although alternative D was not selected as the preferred alternative, important components of this alternative were incorporated into the preferred alternative, B modified.

7. Alternative D would emphasize increased motorized forest access and developed recreation opportunities. Although alternative D was not selected as the preferred alternative, elements of alternative D were incorporated into the preferred alternative, B modified. For example, recommended wilderness areas are not included in the preferred alternative; those areas are now identified as backcountry recreation management areas. The revised plan emphasizes sustainable recreation and includes a mix of motorized and nonmotorized recreation opportunities.

8. The Ashley National Forest is committed to working with our partners and cooperating agencies. As stated in chapter 4 of the EIS:

> Consultation and coordination can take multiple forms. USFWS, State Historic preservation offices, and the tribes are consulted as per the requirements of the Endangered Species Act and section 106 of the National Historic Preservation Act. In addition, Forest Service coordination with tribes occurs through formal government-to-government consultation. Finally, entities which 'have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal or reasonable alternative' (40 CFR 1501.6 and 40 CFR 1508.5) are invited to participate in the planning process, with details of the participation agreement laid out in a formal Memorandum of Understanding (MOU) between the entity and the Forest Service. Entities who have coordinated with the Forest service for the development of the forest plan and EIS are noted below, with those having a formal MOU agreement indicated.

The range of alternatives developed and presented is based on an evaluation of the information gathered from public and internal comments and the purpose and need. While all alternatives provide a wide range of ecosystem services and multiple uses, some give greater emphasis to selected resources based on the theme of the alternative and the response to the focus topics identified in the need to change. We received many comments from cooperating agencies that were supportive of elements of all of the alternatives. The responsible official considered all points of view and the desire for an appropriate mix of uses for the Ashley National Forest in making her decision. The preferred alternative identified in the final EIS is alternative B modified.

Alternatives Considered but Eliminated from Detailed Study

Letter numbers 3, 123

Issue Statements

1. The Forest Service should revisit and implement an alternative focused around increasing vegetation and should promote forest cover and health in line with Forest Service guidelines to increase vegetation and allow for the growth of trees in "non-forested" areas.

2. The Manti-La Sal National Forest Conservation Alternative and initial Ashley National Forest proposal should be directly compared for elements of forest management.

Responses

1. The Forest Service took your suggestion of an alternative focused around increasing vegetation, promoting forest cover and health, and allowing for the growth of trees in "non-forested" areas under consideration. The proposal is included as an alternative considered but not in detail. As explained in the EIS, this alternative was "not within the scope of the plan revision; it does not meet the need for change." As detailed in chapter 2 of the EIS:

> All reasonable alternatives to the proposed action must meet the purpose of and need for change and address one or more of the significant issues. Not all possible alternatives were carried into detailed study because the list of options would have been prohibitively large. Instead, the responsible official identified those alternatives that met the criteria and created a reasonable range of outputs, direction, costs, management requirements, and effects from which to choose.

Additional information pertinent to this proposed alternative can be found in the Terrestrial Vegetation section of chapter 3. Table 3-13 includes the vegetation types on the Ashley National Forest. The vegetation types most prevalent on the Forest that are the primary focus of this section are alpine, coniferous forest, aspen, sagebrush, pinyon and juniper woodlands, and desert scrub. The 2012 Planning Rule requirements for ecosystem diversity from 36 CFR 219.9(a)(2) are: "The plan must include plan components, including standards or guidelines, to maintain or restore the diversity of ecosystems and habitat types throughout the plan area. In doing so, the plan must include plan components to maintain or restore: (i) Key characteristics associated with terrestrial and aquatic ecosystem types; (ii) Rare aquatic and terrestrial plant and animal communities; and (iii) The diversity of native tree species similar to that existing in the plan area."

The alternative proposed by the commenter is focused on the growth of trees in non-forested areas. The national forest is directed to maintain the diversity of ecosystems, including non-forest ecosystems. Although the specific non-forested vegetation community is not specified in this proposed alternative, the EIS does discuss the encroachment of conifers in sagebrush communities:

> Fire appears most important in sagebrush communities of mid-elevations where conifer encroachment may displace shrubs. Historical fire patterns were sufficient to maintain sagebrush in these settings. Most black sagebrush communities in the pinyon-juniper belt require periodic fire to maintain shrubs (Goodrich 2001). If fire frequency remains constant during the next plan period, additional treatments would be necessary to curtail conifer displacement of sagebrush and help neutralize current trend. But fire frequency may increase in many sagebrush communities if the climate becomes warmer and drier, if severe and prolonged drought events become more common, and if the establishment and spread of annual invasive plants increases. During the next plan period, natural fire frequency of montane sagebrush communities is expected to remain outside the natural range of variation, but management prescriptions would be implemented to maintain these communities.

It is important to note that the forest plan does not authorize site-specific projects or activities; therefore, there are no direct effects from adopting the forest plan. Direct and indirect site-specific effects will be further analyzed when future projects are proposed. Although potential short-term consequences of implementing the programmatic approach may be described where appropriate, this evaluation focuses on longer-term indirect and cumulative effects that may occur over the life of the forest plan.

2. The commenter specifically requests that the Forest Service consider elements of the Conservation Alternative developed for the Manti-La Sal National Forest related to the proper monitoring protocol. The Forest Service has updated chapter 4, Plan Monitoring Program, of the plan. Information about adaptive management has been added. The plan components being monitored are now included. A number of the monitoring questions and indicators align with the suggested protocol.

Alternatives – New Alternative Proposed

Letter numbers 77, 121

Issue Statement

1. An alternative should be adopted that would allow for the grazing of areas that were historically grazed that are no longer grazed, which could be incorporated when vegetation projects or wildfire have affected grazing in other areas.

Response

1. The draft EIS and plan components in all alternatives do not preclude the use of allotments that were historically grazed by domestic livestock after re-opening through administrative action or an agency decision. Therefore, all alternatives would provide for grazing of domestic livestock in areas currently not authorized by a term grazing permit.

Alternatives – Range of Alternatives

Letter numbers 74, 114, 120, 128, 135

Issue Statements

1. The Forest Service should analyze a recreation alternative that doesn't just maintain existing road, trails, amenities, and infrastructure but also expands these resources.

2. The draft EIS does not provide an adequate range of alternatives for domestic sheep allotment management. Each alternative involving voluntary waiver without preference would result in the closure of the domestic sheep allotments. The alternatives do not discuss the level of separation required between domestic sheep and bighorn sheep and whether this would leave any of the acres in the sheep allotment remaining. The domestic sheep grazing season is already limited and would not allow for a shift in the season to reduce conflict between domestic sheep and bighorn sheep. Finally, not all of the sheep grazing allotments can be converted to cattle grazing because of their higher elevation. To remedy this, the range of alternatives should include one or more alternatives that maintain existing permits for domestic sheep grazing. In addition, the Forest Service should include more analysis of how the requirements under the range of alternatives would address the risk of pathogen transfer to bighorn sheep.

3. The Forest Service should consider the distance motorized sound may travel when considering the reduction or expansion of motorized recreation under the range of alternatives.

Responses

1. The forest plan revision process provides a range of alternatives for analysis. The plan includes multiple objectives for improving and developing new recreation infrastructure.

2. The draft EIS analyzes a range of alternatives for managing domestic sheep allotments in proximity to bighorn sheep that include no action (alternative A) to closure of a domestic sheep allotment when a grazing permit is voluntarily waived without preference to another qualified applicant and the allotment does not provide separation from bighorn sheep. Alternative B modified provides additional reasonable actions other than closure of the allotment when a domestic sheep grazing permit is voluntarily waived without preference. These actions are (1) providing separation that would mitigate the threat of pathogen transfer from domestic sheep or goats to bighorn sheep consistent with the most current state bighorn sheep management plans,

(2) adjustment of time and/or dates domestic sheep are on the allotment, (3) leaving the allotment vacant of domestic sheep and goats, or (4) another method that would provide separation of the species or that would reduce the threat of pathogen transfer from domestic sheep to bighorn sheep. Alternative D does not close an allotment upon waiver by a permittee, but it does require mitigation of pathogen transfer. Based on these alternatives and the range of actions in alternative B, the draft EIS does provide an adequate range of alternatives for domestic sheep allotment management when a domestic sheep allotment does not provide separation between domestic and bighorn sheep.

3. The commenter suggested inclusion of noise (motorized sound) and impacts under the range of alternatives. The forest plan does not authorize site-specific prohibitions or activities; rather, it establishes broad direction, similar to zoning in a community. Project or activity decisions need to be made following appropriate procedures. For example, site-specific analysis in compliance with the National Environmental Policy Act would need to be conducted in order for prohibitions or activities to take place on the ground, in compliance with the broader direction of the forest plan.

   The EIS does address more broadly potential impacts from noise on specific resources. For impacts on wildlife, refer to the Cumulative Environmental Consequences for Wildlife, Fish, and Plants section. In the Recreation section, the importance of finding solitude for forest users is included: “Participation in recreation can support wellness and personal enrichment. In addition, the undeveloped landscapes of the Ashley National Forest support those seeking solitude and a place where people can reconnect with nature to escape the stresses of everyday life.” The Ashley National Forest recognizes that “limitations on motorized recreation support participants who value solitude and opportunities for quiet recreational experiences.” Primitive summer and winter recreation settings (FW-ROS-DC-05 and 06) “encompass large, wild, remote, and predominantly unmodified landscapes” and provide for “quiet solitude” away from roads and people. In addition, regarding the High Uintas Wilderness (DA-DC-HUW-09): “The wilderness area accommodates levels of recreation use that are ecologically sustainable and provides opportunities for solitude and primitive recreation.” Approximately 20 percent of the Ashley National Forest is designated wilderness or primitive recreation opportunities, and 26 percent is semi-primitive nonmotorized, recreation opportunity settings that provide quiet and solitude (refer to the sections in chapter 3 of the final EIS on designated areas and recreation). Travel management decisions are separate, project-level decisions that determine the specific areas and routes for motorized recreation consistent with areas identified in the plan as suitable for motorized recreation use.

Analysis Methodology

letter numbers 74, 123

Issue Statement

1. Non-natural noise can adversely impact wildlife, recreation, and the visitor experience. The development and implementation of best management practices and policies to preserve and restore natural soundscapes will help conserve and safeguard these values. Therefore, preserving natural soundscapes is necessary for a forest plan consistent with the 2012 Planning Rule.

2. The Forest Service should address the following general concerns with the draft EIS:

   - The draft EIS is clunky and often confusing. In many instances, the chains of logic are incomplete, phrases are interchanged, or analyses are simply divergent.

- The analysis in chapter 3 does not actually analyze the guidelines under each alternative. Rather, they simply repeat the verbiage from the alternatives. The analysis should actually be tied back to the persistence analysis.

- Objectives are mentioned throughout chapter 3 but are rarely clearly stated and easy to track throughout the analysis. No goals or options for meeting those objectives are given, or they are rarely given.

- The analysis does not account for the inclusion of best management practice standards of the industry. For example, on pages 47–71 of chapter 3, on effects from recreation, there is no discussion about sustainably built trails and other amenities that could mitigate effects of trails and recreation activities on the environment

3. The draft EIS is flawed due to lack of analysis of the following:

- Validity of assumptions from previous NEPA processes

- Accuracy of predictions from previous NEPA processes

- Adequacy of Forest Service implementation of previous decisions

- Effectiveness of actions taken in previous decisions

Response

1. The Forest Service agrees that noise can impact both wildlife and visitor experiences. The EIS addresses potential impacts from noise in the section titled Cumulative Environmental Consequences for Wildlife, Fish, and Plants. In the Recreation section, the importance of finding solitude for forest users is noted: “Participation in recreation can support wellness and personal enrichment. In addition, the undeveloped landscapes of the Ashley National Forest support those seeking solitude and a place where people can reconnect with nature to escape the stresses of everyday life.” The Ashley National Forest recognizes that “limitations on motorized recreation support participants who value solitude and opportunities for quiet recreational experiences.” Primitive summer and winter recreation settings (FW-DC-ROS-05 and 06) “encompass large, wild, remote, and predominantly unmodified landscapes” and provide for “quiet solitude” away from roads and people. In addition, a desired condition related to the High Uintas Wilderness (FW-DC-HUW-09) reads: “The wilderness area accommodates levels of recreation use that are ecologically sustainable and provides opportunities for solitude and primitive recreation.” Approximately 20 percent of the Ashley National Forest is designated wilderness or primitive recreation opportunities, and 26 percent is semi-primitive nonmotorized, recreation opportunity settings that provide quiet and solitude (refer to the sections in chapter 3 of the final EIS on designated areas and recreation).

2. The Forest Service has modified the draft EIS documents to improve readability when possible, adopting commenters’ suggested edits. It is important to note that this plan is a programmatic plan and thus site-specific decisions are needed to make progress toward many of the desired conditions and objectives found throughout the plan. Monitoring information should enable the Forest to determine whether a change in plan components or other plan management guidance may be needed, forming a basis for continual improvement and adaptive management. Past monitoring has helped to inform development of plan components and will help make the plan adaptive in the future. Management of National Forest System lands is guided and constrained by

other laws, regulations, policies, executive orders, and procedures in the Forest Service directives system (manuals and handbooks). These are generally not repeated in forest plans. As indicated throughout the EIS in the regulatory framework for each section, best management practices will be adhered to.

3. The first phase of plan revision is the assessment (Forest Service 2017). The assessment reports concerning conditions and trends (both current and future) on the Ashley National Forest. For example, the Terrestrial Vegetation Report (Huber et al. 2017) looked at ecosystem characteristics, primarily at the vegetation type spatial scale. Descriptions include the composition and distribution of vegetation, including aspen, the description of the natural range of variation, current status and trends, influences of drivers and stressors, climate-related risks and trends, as well as a comparison of the natural range of variation and current conditions and trends. The assessment reports are the building blocks for the EIS, informing both the need for change and the affected environment. The EIS describes the affected environment and environmental consequences for each alternative. Monitoring provides feedback for the Forest's planning cycle by testing assumptions, tracking relevant conditions over time, measuring management effectiveness, and evaluating the effects of management practices.

Appendix B – Comparison of Action Alternative Plan Components

Letter number 74

Issue Statement

1. Appendix B, Language Comparison of Action Alternative Plan Components, for livestock grazing differs greatly from the chapter 2 Comparisons Table. For example, under alternative A in chapter 2: "Utilization and stubble height based on land health standards." Alternative B, chapter 2: "50% utilization and 4 inch stubble height guidelines with exceptions where different height will meet desired conditions vs. alternative A, appendix B: "Limit forage utilization by livestock of key browse species on big game winter range to 20 percent." Or, alternative B, appendix B: "To ensure sustainable and resiliency of forage resources, limit utilization of key forage species to no greater than 50 percent of current year's growth, unless long-term monitoring demonstrates a different allowable use level is appropriate." The Forest Service should determine what language will go into the final EIS and the preferred alternative. This is a project-level decision; each allotment has different ecological sites, including different soils, vegetation, and precipitation. Therefore, utilization levels should be determined individually under project-level NEPA.

2. Appendix B, Language Comparison of Action Alternative Plan Components, for domestic sheep grazing management differs greatly from the chapter 2 Comparisons Table. For example: alternative A, chapter 2: "Sheep allotments that remain unutilized for a period of 5 years may be considered for conversion to another class of livestock or closed" vs. appendix B, "No comparable guidelines under alternative A." Alternative B, chapter 2: "New domestic sheep or goat allotments would not be authorized unless separation" vs. appendix B, alternative B: "New permitted domestic sheep or goat allotments should not be authorized." The Forest Service should determine what language will be included in the final EIS and preferred alternative.

3. Table B-2 in appendix B includes guidelines related to new permitted sheep and goat allotments as well as the exclusion of pack goats. The analysis lacks any information on whether there are pack goat permits currently issued, how many, and whether they are currently permitted in bighorn sheep core herd home range. The plan should analyze the permitting of pack goats equitably with domestic sheep. As proposed, this is inconsistent with the plan analysis.

Response

1. The plan component language by alternative was developed to demonstrate a range of alternatives for analysis in the draft EIS. At the time of scoping, no preferred alternative had been identified. The draft EIS analyzes a range of alternatives for managing domestic sheep allotments in proximity to bighorn sheep that range from no action (alternative A) to closure of a domestic sheep allotment when a grazing permit is voluntarily waived without preference to another qualified applicant and the allotment does not provide separation from bighorn sheep. Alternative B modified provides additional reasonable actions other than closure of the allotment when a domestic sheep grazing permit is voluntarily waived without preference. These actions include (1) providing separation that would mitigate the threat of pathogen transfer from domestic sheep or goats to bighorn sheep consistent with the most current state bighorn sheep management plans, (2) adjustment of time and/or dates domestic sheep are on the allotment, (3) leaving the allotment vacant of domestic sheep and goats, or (4) another method that would provide separation of the species or that would reduce the threat of pathogen transfer from domestic sheep to bighorn sheep. Alternative D does not close an allotment upon waiver by a permittee but requires mitigation of pathogen transfer. Based on these alternatives and the range of actions in alternative B, the draft EIS does provide an adequate range of alternatives for domestic sheep allotment management when a domestic sheep allotment does not provide separation between domestic and bighorn sheep.

2. Both appendix B and the chapter 2 comparison table have been updated. Regarding the use of "no comparable guideline under alternative A," the difference is due to the language in alternative A from the existing 1986 forest plan and the language for alternative B developed for the specific alternative. The plan component language by alternative was developed to demonstrate a range of alternatives for analysis in the draft EIS.

3. The Forest does not issue term grazing permits for pack goats. An outfitting and guide permit would be issued if pack goats were being used as a commercial endeavor. The Ashley National Forest currently does not have any outfitter and guide special use permits for pack goats. The Forest Service updated FW-GD-WILDL-10 to clarify that the guideline does not apply to the use of pack goats for recreational use.

Appendix C – At-Risk Species

Letter numbers 64, 72

Issue Statement

1. The Forest Service should add candidate and "under review" species to table C-1, including the monarch butterfly and the western bumblebee.

2. The Forest Service should add citations to table C-2 and check species status for accuracy.

3. The Forest Service should address the possibility of migration for the yellow-billed cuckoo in the Ashley National Forest by revising the sentence "Surveys have been conducted in suitable habitat on the Ashley National Forest; however, there are no records of occurrence on the forest. The species does not exist on the Ashley National Forest" to "Surveys have been conducted in suitable habitat on the Ashley National Forest; however, there are no records of occurrence on the forest. The species is not likely to occur on the Ashley National Forest."

4. The Utah Division of Wildlife has changed their terminology for species listed in their Wildlife Action Plan to "Species of Conservation Need."

5. Certain species of concern should be added to the plan, including the Eureka mountainsnail, Colorado River cutthroat trout, and black rosy-finch.

6. The Forest Service should change the following sentences regarding black-rosy finch: "Occurrences are at high elevations in the associated LTAs." Change to: "Breeding occurrences are at high elevations in the associated LTAs. Non-breeding occurrences may occur throughout the Ashley National Forest."

   The sentences "Currently there are few human-related activities that occur on or threaten this species' habitat; thus, this species' habitats are likely to remain sustainable over time. This is especially true if habitat continues to remain or trend toward satisfactory conditions" should be revised to: "Human-related activities that could threaten this species habitat may include grazing and recreation. The impact of climate change on the alpine is likely to make habitat suitability unstable or uncertain over time."

7. The Forest Service should reanalyze the Mexican spotted owl as it is not consistent between tables C-2 and C-3. The Forest Service should additionally remove "but there is minimal timber harvest that occurs on the Ashley National Forest" from table C-3 because the draft EIS alternatives include increased timber harvest in the future.

8. The Forest Service should expand table C-4 to focus on year-round habitat of species.

9. The Forest Service should consider the impact of recreational rock climbing as a human-related stressor on peregrine falcon nests.

10. If it can be confirmed that a species does not exist in the Ashley National Forest and it is not suitable to restore the species, the stressor descriptions should be removed as they confuse readers.

Response

1. The tables in Appendix C are intended to address species of conservation concern and official federally listed threatened, endangered, and proposed species. However, the pollinator table in the Persistence Analysis (Appendix D) crosswalks plan components with pollinators, which include the monarch butterfly and western bumblebee.

2. Appendix C was completed during the assessment phase of the revision process and received public comment. Adjustments were made based on these comments, and the final document (appendix C, At-Risk Species Report) was completed. Changes will not be made to this completed document. However, the persistence analysis (appendix D of the final EIS) analyzes all at-risk species and includes citations.

3. Yellow-billed cuckoo habitat does not occur on the Ashley National Forest. This species needs large tracts of contiguous riparian deciduous forests (cottonwoods). Occasionally, smaller tracts may be used during migration. However, the Ashley National Forest does not have these large tracts of contiguous cottonwoods or tracts that would be used during migration. The cottonwoods that the Ashley National Forest does have are isolated (no other tracts of cottonwoods nearby) short segments of narrow cottonwood strips and do not constitute typical habitat for this species.

(USFWS 2021). During a meeting between Ashley National Forest and U.S. Fish and Wildlife Service staff on June 2, 2022, the latter agreed that habitat for this species does not occur on the Ashley National Forest and that this species does not merit being evaluated in the Ashley's biological assessment (Christensen 2022). Refer to the biological assessment.

4. The comment about the State changing their terminology for species listed in their Wildlife Action Plan is acknowledged. However, appendix C was completed during the assessment phase of the revision process and received public comment. Adjustments were made based on those comments, and the final document (appendix C, At-Risk Species Report) was completed. Changes will not be made to this completed document. However, the Persistence Analysis (appendix D of the final EIS) analyzes all at-risk species.

5. Appendix C already includes the black-rosy finch and Colorado river cutthroat trout. Appendix C was completed during the assessment phase of the revision process and received public comment. Adjustments were made based on those comments, and the final document (appendix C, At-Risk Species Report) was completed. Changes will not be made to this completed document. The Eureka mountainsnail was added to the list of SCC after the completion of appendix C. Plan components provide the habitat and life requisites for SCC. The Persistence Analysis (appendix D of the final EIS) analyzes all at-risk species, including the Eureka mountainsnail, black-rosy finch, and Colorado river cutthroat trout.

6. The Persistence Analysis (appendix D) has been modified to include the statement that the black rosy-finch may use lower elevations of the Ashley National Forest during the winter. It is true that non-breeding occurrences could occur at lower elevations on the Forest during migration and the winter period, but the 85 known occurrences listed in the table are all at high elevations. Grazing and recreation are speculative, undocumented threats to the black rosy-finch (Johnson 2020). In contrast, the black rosy-finch has been tolerant of researchers visiting their nests, which may suggest tolerance of recreation activities (Johnson 2020).

7. The Mexican spotted owl does not occur on the Ashley National Forest. Refer to the biological assessment and the Persistence Analysis (Appendix D) for further discussion of the Mexican spotted owl. Appendix C was completed during the assessment phase of the revision process and received public comment. Adjustments were made based on those comments, and a final document (appendix C, At-Risk Species Report) was completed. Changes will not be made to this completed document. However, the biological assessment and the Persistence Analysis (Appendix D) include analysis of the Mexican spotted owl.

8. The Persistence Analysis (appendix D) was modified to include a statement about the black rosy-finch using lower elevations during the winter. Year-round habitats on the Forest are already included in this table for the other species. Appendix C was completed during the assessment phase of the revision process and received public comment. Adjustments were made based on those comments, and the final document (appendix C, At-Risk Species Report) was completed. Changes will not be made to this completed document.

9. This is addressed in the plan in the Wildlife section as FW-GD-WILDL-08. This plan component avoids human disturbance to peregrine falcon nest sites.

10. The comment is acknowledged. However, appendix C was completed during the assessment phase of the revision process and received public comment. Adjustments were made based on those comments, and a final document (appendix C, At-Risk Species Report) was completed.

Changes will not be made to this completed document. Refer to the Persistence Analysis (Appendix D) for further information regarding stressors and threats to at-risk species.

Appendix D – Persistence Analysis

Letter number 74

Issue Statement

1. The plan and persistence analysis should address foraying bighorn sheep. The guidelines have been modified, and a goal has been added to the wildlife section.

Response

1. The bighorn sheep plan components have been modified to help address this concern.

Appendix F – Wild and Scenic Rivers Suitability Report

Letter numbers 75, 93

Issue Statements

1. The Forest Service should remove the suitability analysis from the plan entirely and not rely upon or reference past unsuitability findings.

2. Appendix F is presented without previous publication of a Final Wild and Scenic Rivers Eligibility Report and thus without providing required responses and analysis of date presented in comments submitted in November 2019 on the Draft Wild and Scenic River Eligibility Report.

3. The Forest's response in Appendix F to Suitability Criterion 8—adequacy of local zoning or other land use controls in protecting the river's outstandingly remarkable values (ORVs)—does not specify how particular authorities or management criteria would be incorporated into the forest plan to preserve the free-flowing condition and outstandingly remarkable values identified for the four eligible streams

Responses

1. The river segments previously evaluated for eligibility in 2005 and for suitability in 2008 were not reevaluated as part of the forest plan revision process due to limited changed circumstances. See the Ashley National Forest eligibility determination (Forest Service 2005b) and the 2008 suitability studies (Forest Service 2008). A suitability study conducted with the forest plan revision allows for desired conditions across the plan area to be identified and the revision is developed with consideration of integrated resource management. The analysis for suitability during plan revision is preferable due to the suitability analysis that includes the broader picture of plan revision.

2. The Forest Service released the Final Wild and Scenic River Eligibility Report[2] (Forest Service 2022b) in December 2022. In addition, an errata to the draft eligibility report that includes summary responses to comments submitted on the draft report was released in December 2022 (Forest Service 2022c). The suitability status of the river segments that were found to be suitable

[2] The reports are available at: https://www.fs.usda.gov/detail/ashley/landmanagement/planning/?cid=fseprd546973

or not suitable in the 2008 Utah National Forests Wild and Scenic River Suitability study (Forest Service 2008) will not change.

3. The four segments were identified as eligible with a cultural outstandingly remarkable value. The suitability study identified the adequacy of the land use controls that would protect the cultural outstandingly remarkable values if the segment was found to be suitable.

Appendix G – Recommended Wilderness Report

Letter numbers 74, 118

Issue Statements

1. The Forest Service should make the following changes:

   - Appendix G, pages 155–158, Wilderness Alternative B: "The 10,335 acres were selected . . . ," Alternative C: "The 50,157 acres of recommended wilderness in Alternative C . . ." Table 2-3, chapter 2 of the plan had the following wilderness numbers, which do not match appendix G for alternative B, 10,300, and alternative C, 50,200.

   - In the rationale section for each evaluated area is a bullet point with a statement about the number of "Forest Service system roads cherry stemmed out of the area." Since cherry-stemming roads is allowed and has been done in the creation of many wilderness areas, this should not be given prominence in the document. In the Dark Canyon Wilderness Area in southeastern Utah, there is a road cherry-stemmed deep into the wilderness. That cherry stem is arguably more intrusive than any of the cherry-stemmed routes in the areas evaluated on the Ashley, but it didn't prevent the area from being designated and appreciated as a wilderness area.

2. Range improvements are not legitimate reasons for excluding an area from wilderness recommendations.

3. The Forest Service should include local stakeholders and the opinions of several governors regarding wilderness area recommendations.

4. The Forest Service should clarify what the conflicting uses are for each area evaluated and specify the rejection criteria used to determine why lands were not included for recommendation.

5. The Forest Service should consider the importance of lower-elevation areas with wilderness-quality lands that are easier to access for recreation and are in danger of losing their wilderness character if they remain unprotected.

Responses

1. The Forest Service utilized the Region 4 inventory and evaluation process for determining the initial polygons and evaluating their wilderness characteristics, and the initial shape of the polygons was determined by utilizing the inventory criteria. This information was utilized by the responsible official to determine which areas would be included as preliminary administrative recommended wilderness in the forest plan revision alternatives.

2. The Forest Service utilized the Region 4 inventory and evaluation process for determining the initial polygons and evaluating their wilderness characteristics. This information was utilized by

the responsible official to determine which areas would be included as preliminary administrative recommended wilderness in the forest plan revision alternatives.

3. The Forest Service considers comments received in scoping and throughout the NEPA process regarding wilderness recommendations.

4. The Forest Service utilized the Region 4 inventory and evaluation process for determining the initial polygons and evaluating their wilderness characteristics. This information was utilized by the responsible official to determine which areas would be included as preliminary administrative recommended wilderness in the forest plan revision alternatives.

5. The Forest Service considered the evaluations of the potential recommended wilderness inventory polygons for wilderness characteristics and other considerations when determining the range of alternatives and the selected alternative.

Areas of Tribal Importance

Letter numbers 74, 76

Issue Statements

1. The Forest Service should consider flora and fauna tribal management plans and ensure consistency with the Ute Indian Tribe's Greater Sage Grouse Conservation Ordinance, Tribal Management Plan on Hoodless Cactus, Conservation Strategy for the Yellow-Billed Cuckoo, and Conservation Agreement on Cutthroat Trout.

2. The Forest Service should consult with the Ute Indian Tribe on Forest projects or activities within areas of tribal importance.

3. The Ashley National Forest should recognize and respect that the historical and continuing purpose and significance of the Uintah Forest Reserve (now the Ashley National Forest) within the Ute tribal reservation lands were set apart to maintain the water supply for the water rights of the Ute Indian Tribe.

4. The Forest Service should review the Ute Indian Tribe Reservation boundaries surrounding the Ashley National Forest, follow the 10th Circuit Court of Appeals determinations, and consult with the Tribe on any management occurring where boundaries intersect.

5. The Forest Service should make the following edit: chapter 3, page 217, Areas of Tribal Importance: "Interpretation and education programs help enhance visitors' understanding and appreciation for the rich natural and cultural resources of the Ashley National Forest and the surrounding area and build support for public lands."

Responses

1. The Tribal Conservation Plan for Yellow-Billed Cuckoo was reviewed. However, typical habitat for the yellow-billed cuckoo does not occur on the Ashley National Forest; therefore, specific plan components for this species are not appropriate and consistency with tribal conservation plans for this species is not applicable. Refer to the biological assessment. The Tribe's Greater Sage Grouse Conservation Ordinance was reviewed. Plan components for sage-grouse are consistent with this Ordinance as well as both the Utah and Wyoming sage-grouse management plans. Additionally, a wildlife goal (FW-GO-WILDL-02) states that management actions are

coordinated with management plans of other Federal, State, and local agencies, Tribes, and adjacent landowners and that opportunities to manage wildlife habitat are expanded through coordination and collaboration along and across administrative boundaries.

Hookless cactus does not occur on the Ashley National Forest; therefore, specific plan components for this species are not appropriate and consistency with tribal conservation plans for this species is not applicable. The Forest Service is a signatory and active partner with all involved agencies (including the Ute Indian Tribe) on the conservation agreement for cutthroat trout.

2. The Ashley National Forest will comply with all requirements regarding tribal consultation and intends for the revised forest plan to help foster improved communication, coordination, and collaboration with the Ute Indian Tribe. For example, a planning component goal (FW-GO-TRIBE-02) states: "Ashley National Forest staff meet regularly with tribal representatives of the Ute Indian Tribe at both the staff level and the leadership level. Tribal perspectives, needs, and concerns, as well as traditional ecological knowledge, will be incorporated into project design and decisions, as appropriate."

3. The Forest Service recognizes the critical role of National Forest System lands in providing downstream water resources and groundwater for local communities, including the Ute Indian Tribe. EIS sections Areas of Tribal Importance and Cultural and Historic Resources analyze the effects of different alternatives on tribal interests and resources, including water resources. The forest plan establishes desired conditions and other guidance for watershed management, including the Watershed Condition Framework as the approach for identifying target watersheds for restoration and for the development of restoration action plans. Identified priority watersheds are Whiterocks River, Wolf Creek, and Cart Creek. The Watershed Condition Framework process will include tribal engagement to identify new priority watersheds as well as in the development of restoration action plans.

4. The Ashley National Forest will comply with all legal precedent and requirements. The Forest will consult with the Tribe and strives to inform the Tribe of project- and program-level planning and to work collaboratively with the Tribe, evidenced by memorandums of understanding (MOUs) that have been established and are in development. The MOUs provide, among other things, an informal consultation process by which the Forest Service and the Tribe agree to consult with each other regarding methods for preserving and mitigation of areas of tribal importance, including sacred sites; road development and transportation issues; oil and gas issues; cooperation in fire management, including controlled burns; protecting water rights and watersheds; and developing strategies to deal with natural disasters. The Ashley National Forest has consulted with the Tribe during the development of the revised forest plan. Goals in the revised plan include regularly scheduled meetings with tribal representatives at both the staff level and the leadership level and collaboration to facilitate solutions to issues that are important to the Tribe and to the Ashley National Forest. In addition, management approaches for working with the Ute Indian Tribe within the Uintah and Ouray Indian Reservation boundary are now included in the plan.

5. The Cultural Services section of the draft EIS (chapter 3, p. 189) contains a discussion of the importance of education to enhance understanding and appreciation of cultural resources. In addition, a planning component in the Visitor Education and Interpretation section of the plan also states: "Interpretation and education programs help enhance visitors' understanding and

appreciation for the rich natural and cultural resources of the Ashley National Forest and surrounding area and build support for public lands" (FW-DC-VISEDU-01).

Ashley Karst National Recreation and Geologic Area

Letter numbers 10, 113

Issue Statements

1. The Forest Service is in violation of the 2019 Congressional designation of the Ashley Karst National Recreation and Geologic Area because the original designation did not include the newly proposed restrictions.

2. The Forest Service is in violation of the Dingle Act due to the newly proposed restrictions that were not included in the Ashley Karst National Recreation and Geologic Area.

3. The Forest Service should extend the Ashley Karst National Recreation and Geologic Area and its offered protections for the karst system past the Uintah-Duchesne county line.

Responses

1. The Ashley Karst National Recreation and Geologic Area plan direction standards are taken from the Dingell Act that established the Ashley Karst National Recreation and Geologic Area.

2. The Ashley Karst National Recreation and Geologic Area plan direction standards are taken from the Dingell Act that established the Ashley Karst National Recreation and Geologic Area.
3. The establishment of the Ashley Karst National Recreation and Geologic Area was through the Dingell Act, which was passed by Congress and signed by the president. A boundary modification would require another act of Congress.

Attachment B – Management Approaches

Letter numbers 80, 81

Issue Statements

1. The Forest Service should implement a timeline for a forest heritage program plan within one year of implementation of the final EIS.

2. The Forest Service should include a management strategy in the final EIS (similar to the 2015 land management plan for Shoshone National Forest) for developing a list of priority heritage assets and should update it annually.

3. The Forest Service should modify Cultural and Historic Resources Management Approach 01 to include the timeframe within which the heritage plan should be developed by adding: "This plan will be developed within one year of implementation of the forest plan." This should also be included as a goal.

4. The Forest Service should develop a list of priority heritage assets that is updated annually and should include the following language in the Management Actions section: "Priority heritage assets are inventoried and deferred maintenance condition surveys are completed at least every 5 years. Priority heritage assets are heritage assets of distinct public value that are, or should be, actively maintained and meet one or more of the following criteria: The significance and management priority of the property is recognized through an official designation, for example,

listing in the National Register of Historic Places, State Register, etc. The significance and management priority of the property is recognized through prior investment in preservation, interpretation, and use. The significance and management priority of the property is recognized in an agency approved management plan. The designation of a priority heritage asset is a local management decision; the list of priority heritage assets on any given unit is dynamic. A list of priority heritage assets will be kept and updated annually. Priority heritage assets include some areas with significant heritage value but are either small or do not rise to the level of having a specific management area designated to them. The Ashley will share the list of priority heritage assets with the appropriate Native American Tribes and Federal, state, and county officials upon request. The Ashley will also readily consider suggestions of priority heritage assets to include on the list for the Forest."

Responses

1. The Forest Service intends to complete a heritage program plan in a timely fashion (see objective FW-OB-HIST-02 that stipulates development of a heritage program plan within 3 years of forest plan implementation). Cultural and Historic Resources management approach 01 describes the collaborative process envisioned for development and completion of the heritage program plan, which will require more time than the commenter suggested.

2. A management strategy for developing a list of priority heritage assets is provided in the Forest Service Directives for Heritage Resources (Forest Service Manual 2360); the strategy does not need to be reiterated in the forest plan. The forest plan already addresses the need to conduct condition assessments on priority heritage assets on a regular basis. In appendix C to the forest plan, see Cultural and Historic Resources management approach 03.

3. Cultural and Historic Resources management approach 01 describes the collaborative process envisioned for development and completion of the heritage program plan, which will require more time than the commenter suggested. The Forest Service intends to complete the heritage program plan within 3 years of forest plan implementation (see objective FW-OB-HIST-02, which stipulates development of a heritage program plan).

4. Forest Service directives (Forest Service Manual 2360 and Forest Service Handbook 2309.12) define priority heritage assets (Forest Service Manual 2360.5), describe management objectives for heritage priority assets (Forest Service Manual 2362.02), emphasize the preparation of historic property plans for priority heritage assets (Forest Service Manual 2362.4), describe monitoring and condition assessment requirements (Forest Service Manual 2364.31), and provide other management objectives. Management of National Forest System lands is guided and constrained by other laws, regulations, policies, executive orders, and procedures in the Forest Service directives system (manuals and handbooks). These are generally not repeated in forest plans. Because these processes already exist within Forest Service directives, they do not need to be spelled out in the plan.

Attachment E – Crosswalks for Ashley Forest Plan Components

Letter number 64

Issue Statement

1. The Forest Service should update the table under attachment E to appendix E (in the draft forest plan) to be exhaustive and to include all at-risk species in the area.

Response

1. The table includes all at-risk species for the Ashley plan area and thus is indeed an exhaustive list of all at-risk species. The statement the commenter referred to was not well written. The statement meant that the *plan components* (not the at-risk species themselves) listed for the at-risk species were examples, not an exhaustive list, for each at-risk species. That sentence has been deleted from the appendix (this table is now part of appendix D to the final EIS).

Carbon Storage and Sequestration

Letter numbers 24, 72, 110, 123

Issue Statements

1. The assertion in the draft EIS that fuels treatments would remove less carbon from the Forest than wildfire should be re-examined; see the citations provided describing the impacts mechanical disturbance has on soils when used for fire lines, masticating, and other fuel treatments.

2. The following sentence appears in paragraphs one and two on page 135 of the draft EIS and should be edited for clarity: "The Intermountain Region report indicates between 2005 and 2013, total forest ecosystem carbon in the region increased from 1,069 Tg (teragrams) to 1,084 Tg."

3. The Forest Service should include a paragraph at the end of the introduction to carbon storage and sequestration in the draft EIS that indicates the values of non-forested ecosystems in carbon storage and sequestration. The forest plan should also describe the importance of restoring cheatgrass-invaded ecosystems.

4. The following sentence should be added on page 33: "Livestock grazing managed under regenerative grazing principles improves carbon sequestration in soils by stimulating root systems through plant regeneration."

5. The forest plan should include scientific information for carbon sequestration and storage capabilities of all terrestrial and aquatic ecosystems.

6. The language on page E-33 in the forest plan should be rewritten as follows: Carbon Storage and Sequestration: "The carbon that is stored in terrestrial ecosystems is present in living vegetation, soils, and dead organic matter, including wood and litter. Terrestrial ecosystems contain nearly three times the amount of carbon as the atmosphere. All plants absorb carbon dioxide from the atmosphere through photosynthesis and store carbon above ground in stems, branches, and herbaceous materials, as well as below ground in roots and transfer to soils through decomposition. While forested areas generally store higher levels of carbon than non-forested areas, all ecosystems contribute to carbon sequestration and their contributions toward carbon storage will be considered in all management activities on the Ashley National Forest."

   Desired condition FW-DC-CS-01 should be: "Carbon stocks are maintained by promoting healthy and resilient non-forest and forest ecosystems. Regeneration of forest stands and retaining the net acreage of forested communities, as well as the restoration and maintenance of healthy non-forest ecosystems is the focus of all management actions taken place on the Forest."

   Desired condition FW-DC-CS-02 should be: "The use of prescribed fire, while temporarily reducing carbon storage on the Forest, is used to ultimately improve the ability of landscapes to sequester carbon as a result of treatment."

Response

1. The Forest Service has reviewed the citations provided in the comment (Campbell et al. 2012, Wick et al. 2008; Birdsey 1992). It is beyond the scope of the draft EIS to analyze and compare changes to carbon stocks from fuel-reduction treatments and wildfires, and this data was not available in the Intermountain Region reports used to summarize carbon stocks. The discussion of equipment impacts to soils, including ties to soil structure and carbon, was not included in the draft EIS because this is addressed within project-specific NEPA analysis. The references used were more current than Birdsey and were specific to the Intermountain Region and the Ashley National Forest.

   The Affected Environment and Environmental Consequences section on Carbon Storage and Sequestration in chapter 3 of the draft EIS was written to provide a general overview of carbon stocks in forested and non-forested ecosystems on the Ashley National Forest. Detailed analysis of all impacts on soil organic carbon and other carbon pools is not the purpose of this section of the EIS. The information provided includes discussion on the loss of carbon stocks from natural disturbances (insects and disease, wildfire, droughts) and human disturbances (prescribed fire, timber harvest, vegetation management projects). Summary statements are made that the main factors reducing carbon stocks within forest stands in the Ashley National Forest have been insects and wildfire and that the combined natural disturbances have had greater impact on carbon stocks than impacts from forest management practices, but there is not a comparison of wildfire versus fuel treatments. A recent report for forests in the Intermountain Region states that the loss of carbon stocks on the Ashley National Forest between 1990 and 2011 was 87 percent from tree mortality due to insect infestation, 10 percent from wildfire, and 3 percent from timber harvest (Birdsey et al. 2019). The Aspen Restoration Project is a programmatic NEPA project on the Forest, so guidance within forest plan components will direct the use of best management practices for design features and mitigations to reduce impacts to soil resources and provide direction for any needed reclamation.

2. In response to your comment, the second paragraph has been edited as follows: “The amount of carbon stored in the understory, standing dead, down dead, forest floor, and soil organic carbon pools increased between 2005 and 2013, while carbon stored in aboveground and belowground pools decreased. Most of the carbon was concentrated in the aboveground, forest floor, and soil organic carbon pool. Although total forest ecosystem carbon in the region increased, carbon density (carbon stocks per acre) decreased slightly” (source: Forest Service 2015b).

3. The Forest Service has reviewed the citation concerning cheatgrass and restoring rangelands (Austreng et al. 2011). A similar reference (McDermot and Elavarthi 2014) was used to address the importance of cheatgrass, how it impacts carbon stocks, and the importance of maintaining healthy rangeland vegetation. This information has been added to the section on non-forested carbon stocks in the final EIS.

4. Regenerative grazing requires tight pasture control and rotation that is not feasible in Forest Service allotments. In response to this comment, a desired condition statement has been added to address rangelands, as follows: FW-DC-CARBON-02 “Rangeland carbon stocks are supported by management practices that maintain productive rangeland grass and shrub species, soil structure, and soil organic matter.”

5. The Forest Service has reviewed the citations (Zhu et al. 2012; Fusco et al. 2019) and agrees it is important to know existing carbon stocks and how they change over time as reflected in the

Carbon Stock section of the EIS. Because the citations cover large land areas (Western United States, Great Basin region), they provide less specific information than the data provided in the EIS, which focuses on the Intermountain Region and the Ashley National Forest. The final EIS has summarized more relevant and current resources. The Ashley National Forest shares vegetation community types found within the Great Basin but is outside of the Great Basin boundary. The Ashley National Forest does not have data on carbon stocks for all terrestrial and aquatic ecosystems. All Forests in Region 4 currently have baseline data on carbon stocks for their individual forest ecosystems, rangeland soils (soil organic carbon), and shrub ecosystems. In response to comments, the draft EIS Carbon Storage and Sequestration section has added narrative to the subsection Non-Forest Carbon Stocks and Trends, as follows:

> Rangelands are generally important carbon sink areas, with potential to mitigate greenhouse gases in some climatic conditions. The carbon stored in rangelands is stored mainly within the soil resources, estimated to represent 90 percent of the total carbon stocks in range ecosystems (McDermot and Elavarthi 2014). The status of carbon stocks, soil conditions, and rangeland vegetation are interrelated. Maintaining productive rangeland vegetation is critical to carbon stocks. The vegetation is a small carbon stock, and it provides organic matter and organic carbon to the soil surface within plant litter. Plant roots provide soil stability and root exudates add additional carbon into the soil. Soils can retain existing carbon stocks and slowly sequester carbon if they have continual additions of organic materials that counter the carbon lost due to decomposition. The organic matter and organic carbon in soils is important to many soil properties, which in turn support productive vegetation, including aggregating soil and holding soil structure, nutrient exchange, and water-holding capacity.
>
> Abiotic factors may limit the potential of rangelands to store carbon in the future, particularly in drier rangeland areas (McDermot and Elavarthi 2014). Higher and fluctuating temperatures and an increase in drought cycles result in degraded range vegetation with a corresponding loss of carbon stored in vegetation and organic matter and carbon additions to soils. As soil organic additions reduce, the soil structure declines and decomposition rates increase, releasing carbon back to the atmosphere. Higher temperatures increase soil microbial activity, which adds to the rate of decomposition and loss of carbon (McDermont 2014). Invasive species like cheatgrass degrade soil condition and alter soil physical, chemical, and biological properties. They provide less organic matter and carbon to soils from leaf litter or root exudates and often have shallow roots that provide less soil stability. Soils can become carbon sources when invasive species are dominant. Range management can work to maintain carbon stocks by supporting productive vegetation that competes with invasive species and by protecting soil structure and organic matter.

6. The narrative proposed was not adopted but the contents are all contained within the Carbon Storage and Sequestration section of chapter 3. A second desired condition statement was added in response to comments, so the two desired condition statements are now as follows: FW-DC-CARBON-01 “Carbon stocks are maintained by promoting forest stand health and the regeneration of forest stands, and by retaining the net acreage of forested communities” and FW-DC-CARBON-02 “Rangeland carbon stocks are supported by management practices that maintain productive rangeland grass and shrub species, soil structure, and soil organic matter.”

Chapter 1 Purpose and Need for Action

Letter numbers 24, 62, 128

Issue Statements

1. The Forest Service should include language in the introduction identifying that the sage-grouse 2015 amendment is being developed separately from the Ashley National Forest revised forest plan and that once the plan is finalized, it will be included in the Ashley plan.

2. The purpose and need statement should include the need to address disease and mortality within the Ashley National Forest.

Responses

1. Language regarding the revised sage-grouse amendment and how the Ashley National Forest will incorporate it into the revised forest plan was included in the introduction to the Wildlife section of the draft plan. At that time, it was anticipated that the decision on the revised sage-grouse amendment would precede the decision on the Ashley National Forest's revised forest plan. However, it is now apparent that the decision on the revised forest plan will precede the decision on the amendment. As a result, a sage-grouse guideline has been added to the Wildlife section of the revised forest plan to avoid degradation of sage-grouse habitat and to avoid disturbance to sage-grouse during critical time periods for the species. Desired conditions and objectives were already in the Terrestrial Vegetation section of the revised forest plan to maintain or improve sage-grouse habitat. The 2015 greater sage-grouse forest plan amendment (Forest Service 2015a) suggests improving habitats through a landscape-level conservation approach involving targeted restoration and habitat improvements. Plan components incorporate this guidance by maintaining or improving the ecological integrity of sagebrush ecosystems and avoiding degradation of sage-grouse habitat. Appropriate desired conditions, objectives, and guidelines are in the plan to maintain and/or improve sage-grouse habitat, avoid sage-grouse habitat degradation, and avoid disturbance during the critical time periods for sage-grouse, which was the intent of the 2015 greater sage-grouse forest plan amendment. See also the crosswalk for at-risk species, which includes sage-grouse, in appendix D of the final EIS.

2. The requirements of the 2012 Planning Rule, findings from the Ashley National Forest's 2017 assessment (Forest Service 2017), changes in conditions and demands since the 1986 forest plan, and public concerns to date have highlighted several areas where changes are needed to the current plan, necessitating a plan revision. Additional text was added related to purpose and need in the final EIS. The issues used for alternative development that the EIS discusses include "Vegetation Management, Timber Harvest, and Sustainable Ecosystems." The assessment reports discuss the drivers and stressors, which informed the EIS. Refer to the Timber and Forested Vegetation sections of the EIS for additional discussions of tree mortality, the impacts of climate change, insects and disease, etc., and need for active management.

Climate Change

Letter numbers 24, 123, 125, 126

Issue Statements

1. The Forest Service should include the National Roadmap for Responding to Climate Change and the Final Guidance for Federal Departments and Agencies on the Consideration of Greenhouse Gas (GHG) Emissions and the Effects of Climate Change in NEPA Reviews to establish

mitigation actions, climate change adaptation strategies, and analyze climate change impacts on carbon sequestration and offsets, habitat restoration, corridor connectivity, and habitat integrity.

2. The analysis of factors affecting climate change should include the loss of vegetation and stored carbon due to logging, burning, mastication, and livestock consumption of vegetation; emissions generated from the use of gas- or diesel-powered machines to carry out future Forest Service projects; and a calculation of soil carbon loss and a quantification of greenhouse gases produced through motorized recreation.

3. The draft EIS's proposal to remove and burn more trees would further contribute to climate change.

4. The greenhouse gas emission analysis should include the cumulative effects of forage consumption, gases released by livestock, and carbon that is lost in timber removal. The Forest Service should consider removing livestock from the project area to help offset annual greenhouse gas emissions.

5. The forest plan should address future climate change impacts, including effects on vegetative communities, and address how current livestock allocations may not be valid in the future.

6. Actions to improve the Forest's ability to adapt to changing environmental conditions, such as selecting resilient native species for replanting, should be discussed. This should anticipate the effects rising temperatures may have on soil moisture levels, seeds/seedlings growth, the vulnerability of specific species under projected climate conditions in the short and longer term, and any anticipated shift of forest species to more suitable range elevations.

7. The Forest Service should change "may" to "would" in the following sentence: "Under alternative C, however, an emphasis on passive vegetation management may be less effective in trending vegetation types toward the natural range of variation and improving carbon storage capabilities and ecosystem resilience to climate change at large scales, compared with alternative B."

Responses

1. Analysis of a project's impact on greenhouse gas emissions will be analyzed at the project level. The National Roadmap for Responding to Climate Change (Forest Service 2011a) and the Final Guidance for Federal Departments and Agencies on the Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Review (CEQ 2016) are good references that would be considered during project analysis.

2. Analysis from a specific action or a project's impact to greenhouse gas emissions will be analyzed at the project level.

3. Analysis from a specific project's impact to climate change will be analyzed at the project level.

4. Analysis from a specific action or a project's impact to greenhouse gas emissions will analyzed at the project level.

5. Analysis from a specific action or a project's impact to climate change and impacts from livestock grazing would be evaluated at the project level.

6. Potential actions to adapt to climate change were specifically evaluated during the assessment phase of the forest plan revision process. Specifically, impacts to riparian systems (p. 21), insect epidemics (pp. 21 and 28), drought (p. 24), invasive species (p. 28), and wildlife habitat (pp. 35–40). Refer to the Ashley National Forest Assessment, Terrestrial Ecosystems, System Drivers, and Stressors Report (Huber et al. 2017) for the complete analysis. The draft EIS summarizes the findings of that assessment and highlights key trends from impacts to climate change on pages 35, 44, 59, 61, 76, 78, 90, 94, 101, 102, 121, 128, 132, 133, 136, 140, 142, 148, 150, 152, 155, 204, 209, 211, 213, 216, and 237.

   The forest plan section Adapting to Climate Change mentions that information describing the effects of climate change and assessing vulnerability to climate change on the Ashley National Forest is found in Assessment of Watershed Vulnerability to Climate Change for the Uinta-Wasatch-Cache and Ashley National Forests, Utah (Rice et al. 2017b) and Assessment of Aspen Ecosystem Vulnerability to Climate Change for the Uinta-Wasatch-Cache and Ashley National Forests, Utah (Rice et al. 2017a). In addition, the Action Plan for Climate Adaptation and Resilience (USDA 2021) and USDA Forest Service Climate Adaptation Plan (Forest Service 2022a) build on the knowledge for adapting to climate change and guiding land management activities.

7. In some vegetation types (e.g., alpine), passive management may be effective in trending vegetation types toward the natural range of variation and improving carbon storage capabilities and ecosystem resilience. In other vegetation types that may have been impacted by cheatgrass (e.g., Wyoming big sagebrush or Gardner saltbush communities), active management many be necessary to be effective in trending vegetation types toward the natural range of variation and improving carbon storage capabilities and ecosystem resilience. In the draft EIS, the word “may” was used to include this range of variables, so this is the appropriate word here.

Cooperating Agency Relationships

Letter numbers 127, 128

Issue Statements

1. The draft EIS indicated that the Forest Service will grant cooperating agency status to Uinta County, Wyoming. This should have happened at the beginning of the forest plan revision process. Uinta County has submitted the contact persons to be included in the cooperating agency documents.

2. The draft EIS and any associated documents should contain explicit language that acknowledges that any current and future memorandum of understanding agreements between the USDA and state agencies do not and will not alter, limit, or expand state authority relative to tribal authority and that cross-deputized officers will not exercise their powers within the Indian Country lands of the Ashley National Forest. This includes the ability of Forest Service officers to perform law enforcement actions pursuant to state or local laws within the exterior boundaries of the Reservation against tribal members.

3. The Forest Service should take into account cooperating agencies’ input and public comments on alternative B, but for the most part this has not occurred.

Responses

1. The Ashley National Forest is fully committed to working with Uinta County as a cooperating agency throughout the remainder of the process. Uinta County was invited to be a cooperating agency for the forest plan revision in November 2015. Currently, Uinta County, Wyoming, is working with the Intermountain Region Grants and Agreements office to finalize an updated MOU between Uintah, County and the Forest Service. To demonstrate good faith, while the agreement is being finalized, Uintah County has been and will continue to be included in all cooperating agency meetings.

2. In accordance with Forest Service Manual 1920.2 (Objectives: General objectives of land management planning), the objective of the forest plan is to provide guidance and intent for the management of the land and resources within the Ashley National Forest. The forest plan does not provide determinations or direction regarding law enforcement jurisdiction or authority. Many modifications and edits in response to comments received from cooperating agencies as well as the public have been incorporated throughout all of the alternatives. The range of alternatives presented in the draft EIS were created from input received during the scoping comment period. The Forest Service interdisciplinary team has included information received from comments, as much as possible, into one or more of the alternatives. While every comment was reviewed and considered, not every comment generated a modification or edit to the plan or the alternatives. Ultimately, the Forest's interdisciplinary team has the responsibility of creating a plan that meets the mission objectives and goals of the agency and department.

Consistency with State and Local Plans

Letter numbers 24, 62, 68, 74, 77, 90, 101, 113, 121, 127, 128

Issue Statements

1. Many of the alternatives within the draft EIS do not adequately recognize or parallel the local resource management plans. The plans should be carefully considered and paralleled. In addition, the language on page 6 of the draft EIS that states that "The Forest Service collaborated with cooperating agencies throughout the planning process to consider ways the forest plan could contribute to common objectives, address impacts, resolve or reduce conflicts, and contribute to compatibility between the Forest Service and other agencies' plans" should be amended to recognize that some of the cooperating agencies have their own resource management plans and to indicate whether the Forest Service intends for the forest plan to be consistent with these plans to the greatest degree possible.

2. The draft EIS only lays out the legal requirement for the Forest Service to perform a consistency review between the alternatives and state/county land use plans and policies. It should also provide an analysis of the consistency between the alternatives and the relevant plans and policies.

3. The forest plan should follow the 2015 sage-grouse plan for both Utah and Wyoming, by incorporating the existing plan components into the draft EIS. The current language is not consistent with the following language from the 2015 Utah sage-grouse plan: "PHMA—Maintain all lands ecologically capable of producing sagebrush (but no less than 70 percent) with a minimum of 15 percent sagebrush cover, or as consistent with specific ecological site conditions."

4. Partnerships with local, county, state, and other land management partners as noted for alternative D should be expanded to connect the other alternatives as it should be a general goal, not a component of one alternative.

5. The Forest Service should defer to the Utah Bighorn Sheep Statewide Management Plan and the Wyoming Statewide Domestic Sheep/Bighorn Sheep Working Group Plan regarding management of bighorn and domestic sheep interaction. The permanent retirement of domestic sheep grazing allotments should not be implemented; instead, the Forest Service should support the use of best management practices to mitigate the risk of disease transmission between domestic and bighorn sheep.

6. Wilderness recommendations in alternatives B and C would be inconsistent with County policies in the Uintah County, Daggett County, Duchesne County, and State of Utah resource management plans.

7. The reduction of lands suitable for timber production in favor of additional wilderness acreage or additional acreage of backcountry management under alternatives B and C would be inconsistent with adopted state and local resource management plan policies, including the Daggett, Uintah, and Duchesne County Resource Management Plans and the State of Utah Resource Management Plan.

8. The reduction of motorized recreation opportunities under alternative C in favor of additional wilderness and backcountry management areas would be inconsistent with adopted state and local resource management plan policies associated with motorized recreation.

9. The one-size-fits-all utilization and stubble height standards and restricting the timing and intensity of grazing in favor of increased areas managed to maintain wilderness characteristics under alternatives B and C is inconsistent with adopted Uintah County Resource Management Plan policies. The flexibility in alternative D is preferable. Also, restrictions on the ability to access and maintain allotments in proposed wilderness areas would be inconsistent with state and county resource management plan policies.

10. The Forest Service should follow the stipulations in the State of Utah resource management plan for any recommendation of wilderness areas, as follows: “the state’s support for any recommendations made under the statutory requirement to examine the wilderness option during the revision of land and resource management plans by the U.S. Forest Service will be withheld until it is clearly demonstrated that: i) the duly adopted transportation plans of the state and county or counties within the planning area are fully and completely incorporated into the baseline inventory of information from which plan provisions are derived; . . . (v) analysis and full disclosure is made concerning the balance of multiple-use management in the proposed areas, and that the analysis compares the full benefit of multiple-use management to the recreational, forest health, and economic needs of the state and the counties to the benefits of the requirements of wilderness management; and (vi) the conclusions of all studies related to the requirement to examine the wilderness option are submitted to the state for review and action by the Legislature and governor, and the results, in support of or in opposition to, are included in any planning documents or other proposals that are forwarded to the United States Congress.

11. The Forest Service should review the following documents, and the policies of the Forest Service in the Ashley forest plan revision should be coordinated with the public lands policies included in the Uinta County Public Land Policy:

    - Appendix A Public Lands Policy of the Uinta County Comprehensive Plan

    - Resolution 94-04 "Resolution And Binding Action Supporting County Custom, Culture And Heritage In Decision Making Regarding Federal Lands In And Adjacent To, Uinta County, State Of Wyoming."

12. The Forest Service should review the following relevant water quality rules and reports:

    - Headwaters Numeric Nutrient Criteria Rule (R317-2-14), applicable to all Category 1 and Category 2 streams in the Ashley National Forest for Recreation (Classes 2A and 2B) and Aquatic Life (Classes 3A, 3B, 3C, and 3D (1)) 2.2018/2020

    - Combined Integrated Report approved by the Environmental Protection Agency in 2021. This report contains the latest 303(d) list and total maximum daily loads within the national forest. The Draft 2022 Integrated Report will be sent to the Environmental Protection Agency for approval in January 2022

13. Alternative D is the only alternative that reflects the consensus and collaboration that has been reached outside the NEPA process on political questions such as wilderness designations and releases and designations of National Recreation Areas. Alternative C conflicts with existing Federal law through the designation of lands as wilderness that have already been released by Congress for non-wilderness multiple uses.

14. The Forest Service should include vegetation and wildlife habitat goals that help manage wildlife populations at levels meeting Utah Department of Wildlife Resources and Wyoming Game and Fish Department big game management plan objectives.

Responses

1. Related to the review of other agency planning and land use policies, additional information about the plan consistency review has been added to chapter 4 of the EIS and appendix E, Compatibility of Plan with Other Agency Plans. The Ashley National Forest is directed to review relevant planning and land use policies of other public agencies (FS Handbook 1909.12 chapter 44.1):

    > The Responsible Official shall ensure that the Interdisciplinary Team reviews the relevant planning and land use policies of other public agencies to understand and give consideration to those agencies' objectives. The Responsible Official is not required to ensure that a Forest Service land management plan is in accord with State, local or Tribal resource, and land management plans. In the course of considering those agencies' objectives, however, the Responsible Official shall consider ways the Forest Service land management plan could contribute to common objectives, address impacts, resolve or reduce conflicts and contribute to compatibility between Forest Service and other agencies' plans.

2. The Forest Service is not tasked with a review of the consistency of all of the alternatives with agency plans. Instead, the review should focus on "possible conflicts between the proposed action

and the objectives of Federal, regional, State, tribal, and local land use plans, policies and controls for the area concerned" (40 CFR 1502.16(d). And, "Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law. While the statement should discuss any inconsistencies, NEPA does not require reconciliation."

3. Language regarding the revised sage-grouse amendment and how the Ashley National Forest will incorporate it into the revised forest plan was included in the introduction to the Wildlife section of the draft proposed plan. At that time, it was anticipated that the decision on the revised sage-grouse amendment would precede the decision on the Ashley National Forest's revised forest plan. However, it is now apparent that the decision on the plan will precede the decision on the amendment. Therefore, a sage-grouse guideline was added to the Wildlife section of the revised forest plan that avoids degradation of sage-grouse habitat and avoids disturbance to sage-grouse during the critical time periods for the species. Desired conditions and objectives were already in the vegetation section of the Ashley revised forest plan to maintain or improve sage-grouse habitat. The 2015 greater sage-grouse forest plan amendment (Forest Service 2015a) suggests improving habitats through a landscape-level conservation approach involving targeted restoration and habitat improvements. Plan components would incorporate this guidance by maintaining or improving the ecological integrity of sagebrush ecosystems and avoiding degradation of sage-grouse habitat. Appropriate sage-grouse desired conditions, objectives, and guidelines are in the plan that maintain and/or improve sage-grouse habitat, avoid sage-grouse habitat degradation, and avoid disturbance during the critical dime periods for sage-grouse, which was the intent of the 2015 sage-grouse forest plan amendment. See also the crosswalk for at-risk species, which includes sage-grouse, in appendix D of the EIS. Additionally, the statements in appendix D and the plan components in the forest plan are consistent with and meet the intent of the 2015 greater sage-grouse record of decision for the Ashley National Forest (Forest Service 2015a). For example, the 2015 record of decision states on page 140 (Utah section) and page 173 (Wyoming section): "70 percent or more of lands capable of producing sagebrush have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy in greater sage-grouse seasonal habitat." Appendix D and the plan component in the forest plan state that "70 percent or more of sagebrush communities have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy cover."

4. Working closely with partners and cooperating agencies is a priority on the Ashley National Forest. As stated in goal FW-GO-SOCEC-01 in the plan: "The Ashley National Forest and interested local agencies work together to promote a common understanding of important locations and activities that provide important socioeconomic contributions, identify potential projects that may enhance community benefits, and identify mitigation measures that may address adverse impacts on the resources." Alternative D does emphasize "accomplishing desired conditions by shared funding and cooperation with partners" due to increased miles of trail building, for example, that will only be feasible through partnerships. The revised plan does have a number of management approaches under "Working and Coordinating with Tribes, Partners, and Cooperators."

5. Under alternative B modified, plan components direct the Forest Service to coordinate management actions regarding wildlife species, including bighorn sheep, with other Federal, State and local agencies, tribes, and adjacent landowners and their relevant management plans (goals FW-GO-WILDL-02 and 03). Goal 03 states: "Risk of contact between bighorn sheep and domestic sheep is minimized through collaboration with the State of Utah, such as utilizing

memorandums of understanding and applying site-specific management strategies described in domestic sheep permit annual operating instructions that strive to minimize the risk of contact between the two species." Guideline FW-GD-WILDL-09 lists a number of methods for providing separation of domestic sheep and bighorn sheep including "mitigate the threat of pathogen transfer from domestic sheep or goats to bighorn sheep consistent with the most current State bighorn sheep management plans." The final EIS was modified to discuss FW-GO-WILDL-03 in addition to a discussion of the memorandums of understanding related to bighorn sheep management. Refer to the following sections of chapter 3 of the final EIS: Livestock Grazing and Terrestrial Species, both the Rocky Mountain Bighorn Sheep and Environmental Consequences subsections, as well as appendix D of the FEIS for additional information. The final EIS evaluates a range of alternatives related to separation of domestic and bighorn sheep. Refer to appendix B, Comparison of Action Alternative Plan Components for the range of alternatives.

6. The draft EIS includes a range of alternatives that address local government needs. For example, a number of cooperating agency comments on the draft EIS specifically requested that no additional areas be recommended for wilderness designation. Alternative D was developed to address this comment as well as other commenters' concerns. Coordination with local county governments has been an ongoing process throughout the development of the forest plan. This coordination has occurred through regularly scheduled meetings since the beginning of the planning process.

7. Regarding compatibility with agency objectives, as many of the Ashley's cooperating agencies noted, alternative D does not have any recommended wilderness and provides the highest level of timber production that is sustainable while meeting resource protection requirements, providing more compatibility with county and state resource management plans. The Forest recognizes the importance of timber production to the economic and social sustainability of the community. Although alternative D was not selected as the preferred alternative, important components of this alternative were incorporated into the preferred alternative, B modified. Refer to chapter 2 of the final EIS for details on changes made to alternative B modified.

8. As many of our cooperating agencies noted, alternative C includes additional recommended wilderness and a decreased emphasis on motorized forest access and developed recreation opportunities which are inconsistent with county and state resource management plans. The preferred alternative is alternative B modified.

9. Utilization and stubble height guidelines in alternative B were developed based on long-term monitoring of grazing allotments on the Ashley National Forest that document conditions on allotments that consistently exceed 50 percent annual use level. Departures from these guidelines are allowable where monitoring demonstrates another use level is appropriate. These guidelines were also written to provide a range of alternatives for analysis in the draft EIS. Direction in other alternatives may be more consistent with the Uintah County Resource Management Plan; therefore, consistency with county plans regarding forage use is represented in the analysis. Grazing in designated wilderness areas would still be permitted under the 1964 Wilderness Act: "the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture" (Public Law 88-577 (16 U.S.C. 1131-1136) Section 4(d)(4) (Water resources and grazing).

10. The Forest Service has reviewed the State of Utah's process for consideration of recommended wilderness areas. As stated in the EIS, as part of its forest plan revision process the Forest Service

is required to identify and evaluate lands that may be suitable for inclusion in the national wilderness preservation system and to determine whether to recommend any such lands for wilderness designation. While the supervisor of a national forest may preliminarily recommend suitable lands for national wilderness preservation system designation, Congress has the authority to act on wilderness designations.

The regulatory framework for the Ashley National Forest includes the 2001 Roadless Area Conservation Rule (36 CFR Part 294), which establishes inventoried roadless areas and prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in these areas. The areas preliminarily recommended as eligible or suitable for national wilderness preservation include inventoried roadless areas. Though the revised plan will provide strategic guidance, no decisions will be made regarding the regulation of public activities and access to Federal lands; the management of individual roads, trails, or areas is associated with the Travel Management Rule (36 CFR 212). A range of alternatives is considered and analyzed in the EIS, including alternative D, which does not include recommended wilderness and provides for additional motorized access. The responsible official considered all points of view and strived to provide multiple uses in making her decision. The preferred alternative identified in this decision is alternative B modified, which is the result of robust public engagement efforts since 2016. The forest plan does not authorize site-specific prohibitions or activities; rather, it establishes broad direction. Site-specific analysis in compliance with the National Environmental Policy Act will need to be conducted in order for prohibitions or activities to take place on the ground, in compliance with the broader direction of the forest plan, and additional opportunities for public engagement will occur at that time.

11. The Ashley National Forest is directed to review relevant planning and land use policies of other public agencies (Forest Service Handbook 1909.12 chapter 44.1):

    > The Responsible Official shall ensure that the Interdisciplinary Team reviews the relevant planning and land use policies of other public agencies to understand and give consideration to those agencies' objectives. The Responsible Official is not required to ensure that a Forest Service land management plan is in accord with State, local or Tribal resource, and land management plans. In the course of considering those agencies' objectives, however, the Responsible Official shall consider ways the Forest Service land management plan could contribute to common objectives, address impacts, resolve or reduce conflicts and contribute to compatibility between Forest Service and other agencies' plans.

    The Forest Service has reviewed other agency planning and land use policies as part of the plan revision process. Refer to chapter 4 and appendix E of the final EIS.

12. As stated in the revised plan in the Watershed, Aquatic, and Riparian Ecosystems section: "Healthy watersheds and clean water are critical resources that sustain ecosystems on the Ashley National Forest and benefit downstream communities. Since the founding of the Forest Service under the Organic Act of 1897, protecting water resources has been recognized as one of the agency's key roles in managing our national forests."

    Management of National Forest System lands is guided and constrained by other laws, regulations, policies, executive orders, and procedures in the Forest Service directives system (manuals and handbooks). The regulatory framework that the Forest Service adheres to for management of water resources is included in the Watersheds and Aquatic and Riparian

Ecosystems section of the EIS and includes both the Utah Water Quality Act and Utah Groundwater Quality Protection standards. As stated in chapter 3, on Overall Watershed Condition: "Several municipalities have source water protection areas that include large portions of the Ashley National Forest. The Forest Service manages these headwaters to protect drinking water supply downstream, based on the Utah Department of Environmental Quality Division of Drinking Water's requirements."

13. Although alternative D was not selected as the preferred alternative, important components of this alternative were incorporated into the preferred alternative, B modified. The opportunities for public participation were developed early on in the planning process due to the requirement under the 2012 planning rule that the forest plan revision be both collaborative and science based. A number of community members participated in the collaborative effort, which is reflected in the forest plan. The Ashley National Forest places equal value on the input from all the entities that participated in the forest planning process.

14. One of the goals of the Ashley National Forest is working with our partner agencies. Both the State of Utah and the State of Wyoming are cooperating agencies during the plan revision process. The planning team worked collaboratively with agencies during the development of the plan and will continue to do so when implementing the plan. A goal (FW-GO-WILDL-02) in the plan states: "Management actions are coordinated with management plans of other Federal, State, and local agencies, Tribes, and adjacent landowners. Opportunities to manage wildlife habitat are expanded through coordination and collaboration along and across administrative boundaries."

Cultural and Historic Resources

Letter numbers 24, 62, 74, 123, 125

Issue Statements

1. The Forest Service should include the recently listed historic property Lucerne Valley Petroglyph Site in the cultural resources table and disclose any historic properties that are being decommissioned and disposed of.

2. The Forest Service should analyze mining's effects on cultural resources and put protections in place if new sites are discovered during mining.

3. The Forest Service should include consultation with the Ute Tribal Historic Preservation Officer (THPO) in all cultural resource work and should include this consultation in the goal FW-GO-CHR-1.

4. Effective cultural resource management should include the management of public land visitors and visitor activities and is often required to be included as part of a comprehensive land management planning process.

5. Indicator-threshold approaches are not useful for managing cultural resources where no compromises to the condition of the resource can be made. Very precautionary management strategies that emphasize the protection of cultural resources should be developed, including site closures and limiting road and off-highway vehicle access.

6. The Forest Service should change "would" to "may" in the following sentence: "This would lead to the potential overuse in some areas."

Responses

1. The Lucerne Valley Archaeological District has been added to table 3-67 in chapter 3 of the EIS. No change has been made regarding Stockmore and Indian Canyon Ranger Stations as these two resources remain listed on the National Register of Historic Places at the date of publication. A footnote has been added to table 3-67.

2. The Forest Service agrees with this comment. The standards and guidelines in the Cultural and Historic Resources section of the forest plan discuss the need to take into account how projects, activities, permits, and actions can affect cultural and historic resources.

3. Mention of the Ute Tribal Historic Preservation Officer (THPO) has been added whenever consultation with the State Historic Preservation Officer is mentioned. The Ute Tribal Historic Preservation Officer was designated in September of 2021 and took over actual duties in March 2022. The Ute Indian Tribe did not have a Tribal Historic Preservation Officer when the draft plan was released for comment. The change will be reflected in all future documents.

4. The Forest Service agrees with this comment. The desired conditions, standards, guidelines, and goals for cultural and historic resources in the plan help provide a framework for protecting, conserving, and interpreting cultural and historic resources on the Forest.

5. Federal regulations (36 CFR 800) and Forest Service policy (Forest Service Manual 2360) require the Forest Service to consider the effects of authorized activities on cultural and historic resources and to avoid, minimize, or mitigate any adverse effects. This process is also addressed in the desired conditions, standards, guidelines, and management approaches for cultural and historic resources in the proposed forest plan.

6. The existing statement uses two conditional qualifiers—“would” and “potential.” The recommended editorial change—from “would” to “may”—is not warranted.

Cultural and Historic Resources – Historic Management Areas

Letter number 128

Issue Statement

1. The Forest Service should reconsider designation of the Carter Military Road Management Area. It covers many miles across the Flaming Gorge and Vernal Ranger Districts, and its limited access hampers implementation of recreation, range, fuel, and fire projects.

Responses

1. The Carter Military Road, listed on the National Register of Historic Places, is one of the historic management areas on the Ashley National Forest in the revised plan. Management areas are specific areas or features on the Ashley National Forest that have been identified for a unique character, purpose, or management emphasis. This is an appropriate identification for the Carter Military Road.

Designated Areas

Letter numbers 24, 60, 62, 77, 121

Issue Statements

1. The Forest Service should recognize all historic rights-of-way access to structures and facilities in designated areas and provide rationale for designation of designated areas.

2. The Forest Service should incorporate public input to identify areas that protect and enhance the designated areas and that further the Administration's overall conservation objectives.

3. The Forest Service should clarify why it states there "would be no changes to the FGNRA [Flaming Gorge National Recreation Area], scenic byway miles, national recreation trails, geologic areas, or wilderness areas" under all alternatives but then suggests changes in alternatives B and C.

4. The Forest Service should include all 50,157 acres within Flat Top Mountain, East Uintas, Goose Egg Peak, and Queant Lake in the final revised forest plan's wilderness recommendation.

Responses

1. The Forest Service recognizes previously approved lands special use authorizations and right-of-way easements.

2. The Ashley National Forest reviewed and analyzed the NEPA process comments on designated areas for content.

3. There would not be changes to the Flaming Gorge National Recreation Area, scenic byway miles, national recreation trails, geologic area, or wilderness area under each alternative.

4. The responsible official selected Alternative B Modified as the preferred alternative, which does not include any recommended wilderness. The responsible official's decision is based on the need to balance the multiple use management of the Ashley National Forest as well as consideration of comments received on the draft EIS. Existing designated areas comprise roughly 80 percent of the NFS lands on the Ashley National Forest, providing significant opportunities and conservation of resources. The designated areas and management areas identified in the preferred alternative provide primitive recreation opportunities and protections. The areas recommended as wilderness in alternative C (Flat Top Mountain, East Uintas, Goose Egg Peak, and Queant Lake) are allocated as backcountry recreation management areas in the plan, as well as remaining designated as inventoried roadless areas. These areas will have limited motorized opportunities and will remain largely undeveloped landscapes available for dispersed recreation use.

Editorial Comments

Letter numbers 24, 62, 64, 74, 76

Issue Statements

1. Specific editorial comments should be made to the text in the draft EIS and forest plan (see specific comments).

Response

1. The Forest Service has checked each of the suggested edits and made changes to the final EIS and forest plan as appropriate.

Energy and Minerals

Letter numbers 24, 62, 72, 99, 128

Issue Statements

1. Water resources and the values they support are of central importance to Forest management goals, water supplies, nearby communities and the people of the United States. Accordingly, the draft forest plan should prohibit construction of infrastructure associated with mineral or energy resource activities, including roads, within 50 feet of the top of the stream bank of an intermittent or ephemeral stream, prevent the construction of infrastructure associated with mineral or energy resource activities, including roads, within a zone that consists of a wetland or riparian area and the uplands within 325 feet of the margin of a wetland or riparian area. To carry out the dictates of the 2012 Planning Rule and protect Forest resources, the draft forest plan should mandate that the exploration, development, and production of mineral and energy resources be conducted in an environmentally and culturally sensitive manner to avoid wherever possible and otherwise minimize adverse effects on public health and safety, wildlife and wildlife habitat, soils, and air and water quality. Such an approach will serve to protect water quality from degradation, as required by State water quality standards, and will maintain and restore watersheds and aquatic ecosystems, water resources, and riparian areas and provide ecological conditions to support the diversity of plant and animal communities.

2. The forest plan should provide a specific process for identifying, prioritizing and reclaiming mineral and energy resource operations, sites, and roads that are no longer in use, unapproved, or noncompliant. Reclamation of these areas will help prevent adverse impacts to values such as water quality, wildlife habitat, soil stability, recreation, and scenic beauty. The forest plan should adopt the following objective: “Within five years of plan approval, identify and prioritize mineral and energy resource operations and sites and associated roads that are no longer in use. Within 15 years, reclaim operations and sites and decommission roads no longer in use.”

3. Development of mineral and energy resources can be inconsistent with other land uses, including those that led to the designation of specific management areas or that are particularly important to conserve wildlife, recreation, and scenic values. The draft forest plan should close designated areas to mineral and energy resource activities and facilities where development would conflict with the preservation and protection of designation values. The following desired condition should be added to the forest plan: “Management areas, including special interest areas, research natural areas, corridors connecting core wildlife areas, areas needed to provide species protection, areas managed to preserve scenic values, and limited use areas, are closed to mineral leasing, the sale of mineral materials, and locatable mineral entry where warranted to meet the objectives for which the area was proposed or established.”

4. The Forest Service should change the text in chapter 3, page 259 of the draft EIS to acknowledge that interest in renewable energy development is increasing and may result in an increase in future development interest on the Ashley National Forest.

5. If renewable energy development is possible within the Flaming Gorge National Recreation Area, the stipulations for development in the State of Wyoming Greater Sage-grouse Core Area

Protection Executive Order 2019-3 (or current) should be acknowledged. Sage-grouse Executive Order-related restrictions should be acknowledged when discussing any new development in Wyoming in core or non-core area habitat.

6. Contrary to the statement in chapter 3, page 260, the 2012 Planning Rule requires that the responsible official consider mineral energy resources in the planning document (36 C.F.R. 219.10(a)(2)). Moreover, NEPA requires that the Forest Service identify all significant issues on the Forest as they relate to the management actions being proposed (Dept. of Transportation v. Public Citizen, 541 U.S. 752 (2004); Motor Vehicle Mfrs. Assn of the U.S., Inc. v. State Farm Mut. Auto. Ins., 463 U.S. 29, 43 (1983)—agency must consider the important aspects of the problem). The forest plan should, at a minimum, set out the basic parameters for oil and gas leasing. The 2001 Roadless Rule and the 2015 Greater Sage-Grouse Approved Resource Management Plan Amendments do not change this result. Those documents only increase the need to perform an analysis of the management situation as it applies to oil and gas leasing. The Forest Service should analyze and disclose reasonably foreseeable mineral potential, including studies and analysis by the Department of the Interior. The Forest Service should provide a reasonable estimate of potential development to inform the analysis. The Forest Service should provide a reasonable qualitative approximation in the absence of data and describe lacking data. A new oil and gas leasing analysis will have to be completed in the future if it is not addressed in the plan revision.

7. The forest plan states that an act of Congress is not a reasonably foreseeable action, so environmental consequences on leasable and locatable minerals are expected to be the same as under alternative A. Even though it cannot be predicted whether Congress will officially designate additional wilderness areas under alternatives B and C, if these areas are left for a long period of time as recommended wilderness or wilderness study areas, management will preclude any land use that would impact wilderness characteristics. Thus, the environmental consequences on leasable and locatable minerals will be reduced development compared to alternative A.

8. Mineral and energy development is a social and economic sustainability and environmental justice issue for the Ute Indian Tribe, and the national forest was created to protect the Tribe's ability to maintain its homeland through water storage. It is a requirement of environmental justice that this watershed be maintained. The Forest Service should work with the Tribe when making decisions that could impact the Tribe or its interests.

Responses

1. The forest plan already includes appropriate provisions for protection of sensitive resources (including streams, wetlands, and riparian areas), consistent with valid existing rights for mineral and energy resources and in accordance with existing laws and regulations.

2. Mineral and energy development sites are already identified and reclaimed when no longer needed for active or foreseeable future operations. The Ashley National Forest does not have a large number of inactive mineral or energy sites needing to be reclaimed.

3. Decisions to close certain areas to future locatable mineral entry or mineral leasing (minerals withdrawals) are made by Congress or the Secretary of Interior and are inappropriate at the Forest or forest plan level. Mineral withdrawal decisions on existing designated areas (such as the High Uintas Wilderness) were already made at the time those areas were designated.

4. The EIS has been modified to acknowledge increasing national attention and interest in renewable energy projects.

5. No changes to the forest plan or EIS are needed. Any future proposals for renewable energy development are speculative and would be discussed at the project level (not the forest plan level) if and when proposed.

6. This forest plan is not making any decisions about lands to be made available for future mineral leasing or about lease stipulations that would apply to new mineral leases. Such decisions would be made through a separate leasing analysis process. The Forest does not anticipate any new mineral leasing until a new formal leasing analysis has been completed.

7. No changes to the forest plan or EIS are needed. Potential impacts to speculative future minerals proposals and development, from speculative future mineral withdrawals by Congress, would be difficult to quantify.

8. The EIS analyzes the effects of energy and mineral development on tribal interests and resources, including social and economic sustainability and water resources. The Ashley National Forest will comply with all consultation and environmental justice requirements regarding projects or actions that affect tribal interests and resources.

Endangered Species Act

Letter number 18

Issue Statement

1. The Forest Service should coordinate with the U.S. Fish and Wildlife Service to uphold Section 7(a)(2) of the Endangered Species Act.

Response

1. We are aware of the consultation process under the Endangered Species Act and have already been in contact with the U.S. Fish and Wildlife Service Utah Field Office. A biological assessment has been completed and sent to USFWS. See chapter 4 and appendix D of the final EIS for a discussion of the consultation process.

Fire and Fuels

Letter numbers 24, 62, 68, 74, 76, 90, 113, 114, 123, 128, 135, 183

Issue Statements

1. The Forest Service should avoid using fire techniques for vegetation treatments and instead depend on mechanical thinning techniques.

2. The Forest Service should provide more background on wildfire impacts from the past 15 years. These impacts include loss of biological material in soils, loss of wildlife and habitat, increased runoff into streams and creeks, threats to municipal watersheds, and increases in invasive species that replace burned vegetation. The East Fork Fire, which combined with the Trail Mountain Fire and burned more than 90,000 acres, would be a good example to include.

3. On page 129 of the draft EIS, the assumption that fuels treatments have altered the structure and composition of vegetation or fuel loads and have moved vegetation toward desired conditions is

not accurate. Fuel treatment without rehabilitation to kill invasive species only replaces native vegetation with non-native species.

4. The Forest Service should make the following changes to the Fire and Fuels analysis of the draft EIS:

   On page 127: Explain how a flame length can be less than 0 feet or replace with "unburnable," as used in table 3-28.

   On page 131: After the following sentences—"However, with a greater proportion of managed wildland fire, there would be an increased risk of the unintended outcome/consequence that a fire could escape; this could lead to larger wildfires, habitat and watershed damage, and recreation closures. Depending on the extent of such fires, impacts may persist over the long term"—include the following text: "In addition, alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under alternative C, there would be the highest risk of uncharacteristic wildfire. Management direction under alternative C relies on natural processes, which removes many tools otherwise available to reduce the risk of uncharacteristic wildfire."

   On page 23: "no comparable plan component" should read "same as alternative A."

5. The Forest Service should review the conclusions from Reinhardt et al. 2008 and Rhodes and Baker 2008 regarding applicability and probability of success for wildland fuel treatments in forested ecosystems of the western US. The Forest Service should also review findings from Odion et al. 2014 that suggest ecological management goals that incorporate successional diversity created by fire may support characteristic biodiversity, whereas current attempts to restore forests to open, low-severity fire conditions may not align with historical reference conditions in most ponderosa pine and mixed-conifer forests of western North America.

6. The Forest Service should incorporate the National Trails Strategy as a cross-program synergy tool for wildfire suppression and recent research published by the Forest Service regarding fire-facilitated conversion to non-forest in the intermountain western United States.

7. The Forest Service should immediately suppress wildfires in areas within and adjacent to reservation or Indian Country lands, and a process for suppression should be included in all alternatives.

8. The Forest Service should use fire and fuel treatments in a manner that reduces the risk of uncontrolled wildfire while protecting water yields, water quality, and watershed health and resilience.

9. The Forest Service should make specific text changes to address discussion of differences between alternatives in terms of impacts from vegetation and wildland fire management in the socioeconomic and environmental justice section. Suggested changes include the following:

   - (1) On p. 213, edit text to read "Under alternative C, reduced mechanical treatments and reliance on natural processes would reduce short-term impacts from treatment but provide reduced long-term benefits on ecosystems when compared to alternative B."

- (2) On p. 213, edit text to read "Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with alternative A, however, to a lesser degree than alternative B, due to the restrictions on active vegetation management."

- (3) On p. 215, edit text to read "Under alternative D, increased mechanical treatments and less reliance on natural processes would increase short-term impacts from treatment."

10. The Forest Service should review prescribed fires' effects on air quality while looking at state smoke management plans for fire effects on short-term air quality and determine if the effects are significant enough to include in the analysis.

Responses

1. In order to have the maximum flexibility in treating hazardous fuels and restoring ecological integrity, fire needs to be a tool for management. Which tool (fire, thinning, etc.) will be decided at the project-level NEPA analysis.

2. Wildfire effects are discussed in other resource areas. The increased probability for uncharacteristic fire behavior and effects are discussed in the wildland fire baseline report (Gamble et al. 2017) written for the plan revision. The forest plan revision, including the baseline report, started prior to the 2018 and 2020 fire season, which saw some of the largest wildfires on the Ashley National Forest. The East Fork fire did not combine with the Trail Mountain fire. The East Fork fire was a combination of several fires, but the Trail Mountain fire was not one of them.

3. Some of this is not accurate and reflects broad statements that are being applied to local scales. Treatments that alter the structure and composition do move the site to a desired condition where that desired condition is reduced fire behavior in the event of a wildfire or where those structural changes more closely align with natural fuel loadings. If non-native species invade the site, post treatment can displace native vegetation. Rehabilitation of vegetation post treatment is addressed in other sections of the plan. Not all treatments promote non-native vegetation invasion. Treatment of non-native vegetation can be planned for at the project level.

4. Page 127 - This is correct. "less than 0 feet" has been changed to "unburnable." This makes it similar to tables 3-28 and 3-29.

   Page 131 – The Forest Service agrees that with increased special designated areas, the Forest would need to rely on fire managed for resource benefits more under than the other alternatives. This may not necessarily lead to uncharacteristic fire behavior, but it would lead to the potential for unwanted outcomes as currently described. No change has been made.

   Page 23 – The edit to "no comparable plan components" is appropriate because there were no plan components in the current plan that spoke specifically to these concerns. This change has been made.

5. The suggested literature was considered and analyzed. These topics are addressed by other literature or sources of information cited in the draft EIS that are appropriate or equally relevant.

6. Utilization of trails for fire purposes is permissible in the plan and can be treated at the project level or under other management plans. Vegetation conversion to non-forest due to fire is

understood by the Forest Service and is the reason this plan encourages management of a resilient forest.

7. The Forest Service values the concerns of cooperators and adjacent landowners and takes those concerns under strong consideration when deciding on the management strategy of each fire. Suppression is a component and strategy option of each alternative, but retaining the ability to utilize naturally ignited fire in order to meet ecological integrity or reduce fuel loadings is a comparatively powerful tool. The plan allows for a balanced approach to every strategy and allows for that decision at the time of the fire in coordination with adjacent landowners and cooperators.

8. This is the intent of fire and fuels treatments. The specific objective will be determined at the project level for each treatment.

9. (1) This statement would only be true if the rate of treatment completion were less under alternative C than B, which could be true if just relying on natural processes for the treatments. But, as a measure of effectiveness, natural processes would have equally long-term benefits.

   (2) This is similar to (1) the rate of treatment may be less than B, but the probability of undesired fire effects is also higher with C than B. Therefore, the statement is marginally correct if certain assumptions are allowed. The final EIS has included the suggested text.

   (3) The sentence has been changed to state ". . . and *less* reliance. . ."

10. The Forest Service is required to follow state rules for air quality and smoke production for prescribed fire.

Flaming Gorge National Recreation Area

Letter numbers 74, 68, 113

Issue Statements

1. The Forest Service should clarify the potential effect the plan will have on resources in Flaming Gorge National Recreation Area.

2. The Forest Service should clarify whether the Ashley plan revision will include the allotments and acres from the Flaming Gorge plan.

3. The Forest Service should clarify why the Flaming Gorge National Recreation Area was not included as a designated area.

4. Large-scale closures or restrictions on future trail development in the Flaming Gorge National Recreation Area would be difficult to reconcile with the establishing legislation. Only alternative D provides the flexibility necessary to comply with provisions.

Response

1. The EIS analyzes the effects of the plan on resources across the Ashley National Forest, including the Forest resources that occur on the Flaming Gorge National Recreation Area.

2. The Ashley National Forest plan will include plan components and direction for grazing allotments in the Flaming Gorge National Recreation Area. Grazing allotments on the Wyoming

side of the Flaming Gorge National Recreation Area are combined with Bureau of Land Management grazing allotments and are administered by the Bureau of Land Management.

3. The commenter is correct that not all designated areas were included in the effects analysis for wildlife in the draft EIS. Although the text read "Under all alternatives, the existing designated areas described in chapter 2 would remain," not all areas were included also in tables 3.36 through 3.38. These omissions have been corrected in the final EIS.

4. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. If conflicts or resource issues occur, the Forest would conduct a project-specific NEPA analysis to identify the effects to resources of restricting trail uses.

Forest Plan

Letter numbers 64, 72, 74

Issue Statements

1. There is inconsistency in the level of details for plan components, with some resources (e.g., fisheries/aquatics) having detailed objectives, while others (e.g., livestock grazing) not having sufficient details to guide project development. The Forest Service should revise the plan to have more uniformly developed plan components.

2. The Forest Service should remove "oil and gas" as a traditional resource on the Forest. Oil and gas development is currently addressed under "2. Economic Resiliency" and should not be considered a "traditional" resource on the Forest. Customary and traditional use means a long-established, consistent pattern of use, incorporating beliefs and customs which have been transmitted from generation to generation and that play an important role in the economy of the community. Oil and gas development on the Ashley National Forest does not meet this description.

3. Specific edits should be made to the introduction section of the Terrestrial and Aquatic Ecosystems section of the forest plan, as follows:

   Page E-7, Terrestrial and Aquatic Ecosystems. Suggested rewrite: Terrestrial and Aquatic Ecosystems. "The diverse ecosystems of the Ashley National Forest are a key component to supporting and maintaining its environmental, social and economic values. Healthy terrestrial and aquatic ecosystems contribute to functioning and resilient forests and rangelands and watersheds, which lead to abundant fish and wildlife, and abundant water supplies, beautiful landscapes, and a variety of other ecosystem services."

Responses

1. Our goal is to provide an integrated set of management direction (or plan components) that provides for the social, economic, and ecological sustainability and multiple uses of the Forest's lands and resources. The plan includes forestwide, designated area, and management area desired conditions, objectives, standards, and guidelines plus monitoring questions and indicators, as well as other plan content such as management approaches. The planning team collaboratively developed management direction for each resource. There are differences in the number and type of plan components by section based on the experience of the team in managing those resources.

Each resource is also guided by a regulatory framework that includes applicable acts, laws, and executive orders.

2. The wording in the draft EIS has been updated in the final EIS to read as follows:

   - There is a need for economic resiliency. This includes supporting local communities and economies and includes management direction to sustain the multiple uses of its renewable resources. The plan also addresses maintaining the provision of many ecosystem services, which are the benefits people obtain from ecosystems.
   - There is a need to manage NFS [National Forest System] lands to sustain the multiple uses of its renewable resources. This includes management of uses such as mineral development, livestock grazing, timber and woodland products use, and fuelwood collection. There is a need to balance these uses while maintaining the long-term health and productivity of the land.

   As stated in the revised plan: "The Ashley National Forest contains a variety of energy and mineral resources, including crude oil and natural gas, limestone, phosphate, trona, and others. People have been using and benefitting from these resources for many years. . . . Part of the Forest Service's mission is to encourage, facilitate, and administer the orderly exploration, development, and production of mineral and energy resources on National Forest System lands to help meet the present and future needs of the Nation."

3. The suggested change has been made to the forest plan.

Forest Plan – Plan Monitoring Program

Letter number 64, 74

Issue Statements

1. The Monitoring Plan should include specific monitoring questions and indicators for each Federally listed species and Species of Conservation Concern, not just Greater Sage-Grouse, fringed myotis, and Colorado River cutthroat trout. Similarly, the Forest Service should provide detailed ecological indicators for other vegetation communities, not just sagebrush habitat.

2. In the Monitoring Plan, using vegetation communities as the central indicator may not lead to successful outcomes for wildlife and may not be a suitable metric for all species. Instead, the monitoring question and indicators should be updated to acres of occupied habitat, number in population, or another metric that directly relates to the presence of the species of interest.

3. The Forest Service should consider adding Focal Species and trigger points to the Monitoring Plan for the following ecosystems and desired conditions: stream and riparian, wetlands, landscape connectivity, aspen, sagebrush, and alpine. In doing so, the Forest Service should consider the recommendations and guidelines in the following resources: Noon et al. (2009)15, Schultz et al. (2013), Hayward et al. (2016), and National Advisory Committee for Implementation of the National Forest System Land Management Planning Rule (2018).

4. The Forest Service should add the following to the monitoring table under the "Potential Data Sources" column: "Forest Species-specific Monitoring and Studies" and "Species Monitoring Studies Conducted in Collaborations with Partnerships."

5. The Forest Service should include other species of interest in the Monitoring Plan, not just elk, mule deer, and moose.

6. The Forest Service should make the following changes to the Livestock Grazing sections of the draft EIS:
   -App. E, Page E-93, Add: How many Head Months actively grazed on an annual basis? Add: How many acres were actively grazed on an annual basis? Add: How many allotments were vacated, closed, or placed in forage reserves?
   -The Plan needs to include the listed Monitoring Questions for livestock grazing to identify how much grazing is changing over the years.

Response

1. The monitoring plan includes a monitoring question and associated indicators for all species of conservation concern and threatened, endangered, proposed, or candidate species. These species are lumped together in one monitoring question to avoid redundancy. This monitoring question is based on habitat (vegetation communities that support those species).

2. There are many factors outside the control of the authority of the Ashley National Forest that may affect wildlife and cause fluctuations in the number of individuals in a population. For instance, elk and mule deer populations fluctuate to a large degree depending upon hunting permits issued by the State and weather, neither of which does the Forest Service have control over. Sage-grouse numbers often fluctuate based on weather and rabbit cycles (predator/prey relationships) and these fluctuations in sage-grouse numbers are often regional or range-wide. Even bighorn sheep have many factors outside the control of the Forest Service, such as disease issues bighorn sheep encounter on non-forest service lands, other diseases besides bacterial pneumonia, weather, and the State authority in herd management (augment, cull, or transplant). As such, monitoring questions should be based on ecological conditions that the Forest Service has authority to manage. The Forest Service has the authority to manage habitat for wildlife and the monitoring questions are directed at vegetation communities, which provide the basic life requisites for wildlife (whether they are predator or prey).

3. Triggers have been incorporated in various desired condition statements, guidelines and other components of the plan for various forest and non-forest vegetation types. These reflect long-term monitoring and needs identified during the assessment phase of plan revision (a process consistent with recommendations in Hayward et al. (2016) and National Advisory Committee (2018)). Plan component examples include triggers/thresholds for various forest and non-forest community characteristics (FW-DC-VEGNF-01, 02, FW-DC-PJ-01, FW-DC-ASPEN-01, 02, FW-DC-CONIF-01, 02, FW-GD-SOIL-03, FW-GD-GR 01, 02). The monitoring plan lists monitoring questions, indicators, and potential data sources, a process consistent with suggestions described by those literature sources. Aspen is a focal species for the forest. Wildlife species of conservation concern have been designated as part of plan revision.

4. The plan monitoring program (chapter 4 of the forest plan) has been updated based on public comments received, specifically related to inclusion of a discussion on adaptive management. In addition, after internal discussion, the Forest Service revised the monitoring tables to no longer include a “data sources” column. We will be developing a monitoring implementation guide, which will be a working document for use by Ashley National Forest personnel, providing detailed information needed to carry out the monitoring program. As a working document, this guide may be edited or modified under the adaptive management approach. These modifications

may occur in response to new information, changes in methodology or data sources, or other factors relevant to the monitoring process. This monitoring implementation guide will include methods and protocol for gathering the data for each of the monitoring questions, as well as other relevant information such as data sources, who is responsible for the monitoring tasks, and partnerships that may occur with respect to the monitoring activities. It will also include information that will assist in the evaluation of the monitoring results, specifically by providing descriptions of the monitoring questions and potential evaluation questions that can help focus and frame the evaluation of the results. The monitoring questions address the most critical components for informed management of the Forest's resources within the financial and technical capability of the agency. Every monitoring question links to one or more desired conditions, objectives, standards, or guidelines. However, not every plan component has a corresponding monitoring question. In addition, project and activity monitoring may be used to gather information for the plan monitoring program if it will provide relevant information to inform adaptive management.

5. These are the "species of interest" identified in the forestwide assessment. These are the terrestrial wildlife species that have been identified as having high recreational or economic importance and that generate a considerable amount of the visitor use on the Ashley National Forest.

6. The 2012 Planning Rule requires that monitoring information enable the responsible official to determine if a change in plan components or other plan content may be needed and whether progress is being made toward meeting desired conditions, objectives, or other plan components in plan. Not all plan components need to have a corresponding monitoring question (§ 219.12(1),(2)(vii)). The addition of head months as an annual indicator there would need to be a desired condition that provides an adequate description of when the indicator is met or the purpose in tracking the indicator. The desired condition most relevant to adding head months as an indicator is in Alternative B and states that "Sustainable rangelands provide forage for livestock grazing that contributes to the agricultural economy and local employment and supports traditional lifestyles, cultural values, and generational ties to the land" (FW-DC-GRAZ-01). Although head months does not measure forage, it may inform the contribution of livestock grazing to the local economy. However, there is not a threshold or benchmark that would indicate whether or not desired condition would or would not be met or how many head months forestwide would be required to meet desired condition. In addition, head months are tracked annually in other corporate databases.

Government-to-Government Consultation

Letter number 76

Issue Statements

1. The most appropriate and effective management of the Ashley National Forest lands is management conducted exclusively by and through the Ute Indian Tribe. If this is not possible, the Forest Service should develop a partnership or joint-management system with the Ute Indian Tribe to manage tribal lands (lands within the reservation boundary) that includes the prior informed consent with the Tribe.

2. The Forest Service should recognize that all lands of the Ashley National Forest within the exterior boundary of the Ute Indian Tribe Reservation are "Indian Country" and that the rights of the Ute Indians were not diminished in this area. The Forest Service should recognize that the

Tribe's laws and regulations within the exterior boundary of the Ute Indian Reservation have that force of law, and the Forest Service should work with the Ute Indian Tribe to manage these areas.

3. The Forest Service and national forest representatives should consult with the Tribe before making suitability determinations regarding oil and gas exploration and development.

4. The Forest Service should commit, through language in the forest plan, to meet with the Ute Indian Tribe's staff-level employees monthly or as needed and meet with the Tribe's elected leadership quarterly or as needed. The Forest should work closely with the Tribe's Tribal Historic Preservation Officer and its Cultural Rights and Protection Department regarding cultural and historic resources.

Responses

1. The Ashley National Forest is in the Ute Indian Tribe's original tribal homelands. The Forest Service recognizes the Ute Indian Tribe has significant historical, cultural, and religious interests in the National Forest System lands within the Ashley National Forest. In accordance with Joint Secretarial Order No. 3403, the Ashley National Forest will endeavor to engage in co-stewardship with the Ute Indian Tribe where permitted by law and to consider Tribal proposals, recommendations, and knowledge that affect management decisions wherever possible. The Forest intends to continue consultation with the Ute Indian Tribe across the entire Forest. The revised plan emphasizes the need for more collaboration and coordination between the Ashley National Forest and the Ute Indian Tribe, such as the continued use of a Planning Task Force Group.

2. In accordance with Forest Service Manual 1920.2 (Objectives: General objectives of land management planning), the objective of the forest plan is to provide guidance and intent for the management of the land and resources within the Ashley National Forest. In providing this guidance, the plan considers tribal interests, resources, and treaty rights. However, the plan does not make legal determinations regarding jurisdiction, treaty rights, or land status. The Forest is committed to working with the Ute Indian Tribe on the management of areas of tribal importance and to complying with all legal precedence and requirements in its interactions with the Tribe. The following language has been added to the forest plan in the introduction to the section titled Energy and Minerals: "For leasable minerals, the Forest Service would have to complete a leasing analysis before any new mineral leases could be issued on the Ashley National Forest. The leasing analysis process is used to determine what areas of the forest should be made available for future mineral leasing and what lease stipulations would be appropriate for those areas. Any future suitability determinations for mineral leases would follow existing laws and regulations and would include a leasing analysis with review and input from Native American Tribes, County governments, State governments, and the public."

3. The goal (FW-GO-TRIBE-03) was changed to indicate the intent to have staff meet monthly and leadership meet quarterly.

Glossary

Letter number 64

Issue Statement

1. The Forest Service should define "invasive," "encroaching," "nonnative," and "noxious."

Response

1. Definitions of these terms have been added to both the final EIS and forest plan glossaries.

Inventoried Roadless Areas

Inventoried roadless areas concerns are addressed in issue statements and responses for Planning Rule, Alternatives B and C, Consistency with state and local plans, Backcountry Recreation Management Areas, timber, and High Uintas wilderness areas.

Land Status and Ownership and Special Uses

Letter number 67

Issue Statement

1. The plan should also state that, under the land adjustment programs, the Forest Service may dispose of lands no longer needed to meet Forest Service objectives.

2. County zoning ordinances and zoning maps do not apply to Forest Service lands in the draft EIS, but they do apply to inholdings.

3. The Forest Service should include guidelines and desired conditions that seek opportunities to maintain or increase public land connectivity across the Forest and improve other recreational activities.

4. Vegetation treatment in corridors and along linear transmission facilities should meet facility safety requirements, provide for control of invasive species, and provide for revegetation to reduce visual impacts. Further, buried utilities should be prioritized.

5. The Forest Service must adhere to and recognize the Ute Indian Tribe's authorized land uses and statuses.

6. The Forest Service should modify the following sentences on page 298 of the draft EIS to read: "The Forest Service would annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternatives A and C."

Response

1. The Forest Service is required to follow all existing laws, regulations, and policies related to the management of National Forest System lands. Forest plan direction is designed to supplement existing direction and not repeat said direction. The Federal Land Policy and Management Act of 1976 (FLPMA) details the criteria for disposal for National Forest System lands. In the event the Forest Service determines that disposal of National Forest System lands is warranted, applicable laws, such as the Federal Land Policy and Management Act, regulations, and policies will be adhered to.

2. The land management plan will provide a strategic framework that guides future management decisions and actions, subject to valid existing or statutory rights, on National Forest System lands only. Similarly, and as noted by the commenter, county zoning ordinances and zoning maps do not apply to National Forest System lands but would apply to county lands, including county inholdings within the national forest. The 2012 Planning Rule also requires that Forests take an

all-lands approach to ensure that ecological sustainability and contributions to social and economic sustainability are considered in the context of the larger landscape. This involves managing the plan area in partnership with both public and private landowners and interested parties to ensure management efforts are coordinated whenever possible.

3. The Forest Service recognizes the value of connectivity across the landscape for multiple purposes: ecological, cultural and social. The Ashley National Forest plan contains numerous plan components focused on connectivity. Related to improving recreation opportunities across the landscape, the plan includes a desired condition (FW-DC-TRAIL-03) that states: "The Forest Service trails are part of a coordinated multi-jurisdictional transportation system. The national forest trail system conforms to the Ashley National Forest travel management plan while connecting with the transportation systems of other Federal, State, and local jurisdictions." The value of working with partners and with adjacent landowners is part of the "all-lands" approach advocated in the plan, evidenced by the following goal (FW-GO-TRAIL): "Strategies are developed and carried out to significantly increase the roles of communities, partners, and volunteers in planning, developing, and maintaining motorized and nonmotorized trails." In addition, the plan includes the following goal (FW-GO-LAND-01): "The Ashley National Forest works with local, county, and State governments, adjacent land management agencies, and landowners to identify and acquire road and trail easements as necessary." The forest plan is not intended to take the place of travel analysis; however the plan does provide context and guidance for future travel management decisions.

4. Utility corridors and communication sites are located primarily in existing facilities or on existing administrative sites. New sites and corridors are established only to achieve social, economic, and ecological benefits. Local distribution lines and smaller pipelines occur within existing road rights-of-way or other previously disturbed areas, where technically feasible.

5. The Forest Service recognizes that the Ute Indian Tribe has significant historical, cultural, resource, and religious interests in the National Forest System lands within the Ashley National Forest. The Forest Service is committed to engaging in early, meaningful government-to-government consultation with the Ute Indian Tribe on all policies with tribal implications, including those affecting tribal interests, rights, or law, across the entire Forest. To this end, the draft EIS includes a section titled Areas of Tribal Importance. The revised plan emphasizes the need for more collaboration and coordination between the Ashley National Forest and the Ute Indian Tribe, such as continued participation in the Tribal Planning Task Force.

6. The section of the draft EIS that the commenter is referring to is Environmental Consequences for Scenic Resources—Alternative D. The analysis is comparing the effects of the action to alternative A, the no-action alternative, and the current plan. The preferred alternative, B modified, does not include the stated objective to "Annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest." The Forest Service determined it was more appropriate to include the following goal (FW-GO-LAND-01) in the plan: "The Ashley National Forest works with local, county, and State governments, adjacent land management agencies, and landowners to identify and acquire road and trail easements as necessary."

Land Status and Ownership and Special Uses – Withdrawn Lands

Letter numbers 24, 119

Issue Statement

1. The Forest Service should recognize that certain lands have been withdrawn due to the presence of the Central Utah Water Project. Further, the Forest Service should clarify the lands that have been withdrawn for this purpose and include a map of these locations.

Response

1. Plan components have been added to the Lands and Special Uses section of the plan (FW-GD-LANDSU-03 and FW-GO-LANDSU). A map of Central Utah Project withdrawn lands (figure 5 in appendix A) and management approach 12 under Working and Coordinating with Tribes, Partners, and Cooperators in appendix B of the plan will be used to ensure future coordination.

Livestock Grazing

Letter numbers 24, 45, 62, 64, 67, 72, 74, 77, 79, 90, 101, 111, 120, 121, 123, 126, 128

Issue Statement

1. The livestock grazing utilization and stubble height direction are not reasonable, practical, or flexible. Site-specific guidelines are a better approach to meet desired conditions.

2. Possible restrictions on access and reduction in grazing from historic levels in wilderness are unacceptable unless substantial evidence shows restrictions are necessary and there are no other mitigation measures available. The grazing management plan on wilderness within the Ashley should be in accordance with the Committee on Interior and Insular Affairs of the Representatives accompanying H.R. 5487 of the 96th Congress (H. Rept. 96-617).

3. Vegetation management projects proposed in the draft EIS that affect grazing should be accomplished in a way to minimize the impacts on grazing.

4. There is inconsistency in the terminology used in the analysis, such as the use of “closed” as well as “exclude” and “utilization” and “utilization of key forage species.” The analysis should be updated to address these inconsistencies.

5. Domestic sheep are managed to keep separate from bighorn sheep and therefore do not contribute to reducing forage for bighorn sheep. The plan does not analyze where allotments overlap with bighorn sheep. Bighorn sheep on the Ashley National Forest are translocated and should not be considered “core native.”

6. Proposed allotment closures are discouraged by Forest Service manuals. Allotments proposed for closure are already deemed suitable and capable and should not be closed. Identify closed allotments and develop alternatives that consider reopening them to active grazing.

7. The following statement should be removed from chapter 3, page 249 of the draft EIS: “Market demand for livestock products in the U.S. is expected to slowly decline over the coming decades.” As the population increases, demand for beef and lamb is likely to increase.

8. The plan should not allow expansion of bighorn sheep populations where it negatively impacts domestic sheep allotments; rather, it should identify plan components to ensure persistence if possible.

9. Analysis of grazing on ecological resources is lacking. The Forest Service should explain why the present management has failed by a detailed and quantitative assessment of all Forest data over time. For example, grazing impacts on seedling/sapling age class, aspen, and watershed integrity should be addressed.

10. Lands capable for livestock grazing need to be updated with the most current data. There have apparently been no current surveys to determine the amount of desirable and intermediate forage production that is available today after decades of drought. A capability analysis of the allotments in the Ashley National Forest should be updated to reflect the current Regional criteria, and stocking rates should be updated accordingly.

11. The Forest Service should review the use of 50 percent utilization. An allowable use or utilization rate of 50 percent is double that based on actual evidence and is not proper, or sustainable, in arid areas such as the Ashley National Forest. Lack of required rest is common across Forest Service- and BLM-managed lands in the West and leads to detrimental effects. Grazing systems are not as good as they seem.

12. The Forest Service should ensure that the requirements outlined in the annual operating instructions for the project area grazing permits are being met. The Forest Service should disclose the level of permittee compliance with terms and conditions of allotment management plans and grazing permits as well as utilization and other monitoring protocols and results.

13. The Forest Service should employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife. In addition, desired conditions to provide forage and residual cover for wildlife (especially following management activities or natural disturbances) should be added, and stocking rates in drought conditions when vegetation is slow to recover should be adjusted.

14. Text that insinuates that the control of woody encroachment is positive but the return of sagebrush is negative should be revised. Healthy sagebrush vegetation also provides for herbaceous vegetation in the understory that is of high value to livestock and wildlife.

15. The forest plan should include specific utilization standards and guidelines for each grazing vegetation type. The following vegetation types should be considered, at minimum: wet meadow, moist meadow, dry meadow, sagebrush, subalpine meadow, aspen, and willow. The Rangeland Management Supplemental Report for the Inyo National Forest (Frolli and Sims 2018) should be considered when revising the Livestock Grazing section.

16. The benefits of livestock grazing should be addressed in each alternative, not just the negative effects. For example, managed grazing improves soil health through improved ground cover, resulting in improved nutrient incorporation and water retention and improved carbon sequestration.

17. Appropriate disciplines should be used to help identify limiting factors and help design and monitor the studies necessary to determine when proper use has been reached. Develop proper-use criteria from interdisciplinary input, for example, fishery surveys, stream surveys, vegetative trend analysis, research findings, coordination requirements, observations, and good judgment. It

is necessary that they be based on the factor that becomes critical first, the limiting factor. Where similar soils, ecological types, and coordination requirements extend over an entire rangeland management unit, a given set of proper-use criteria may be applicable to an entire management unit. On the other hand, where a mosaic of streams, soils, vegetation types and coordination requirements exist, it is necessary to develop separate criteria for each important situation. On some rangeland management units, it may be necessary to establish more than one set of proper-use criteria.

18. The issue of annual bank trample with a maximum 20 percent annual trample limit should be addressed.

19. The Forest Service should not close any grazing allotments in destination recreation management areas.

20. The analysis should fully address the impacts to allotments and operations; the economic impact from allotment closure is not analyzed.

21. The Forest Service should make the following changes to the livestock grazing sections of the draft EIS:

    a. Appendix E, page E-93, add how many head months are actively grazed on an annual basis, how many acres were actively grazed on an annual basis, and how many allotments were vacated, closed, or placed in forage reserves?

    b. The lack of natural fire [add the following text]"and the implementation of passive forest management policies" over a century has led to timber stands that are increasingly dense with older trees, and thus more susceptible to insects and disease. Historical fire suppression [add the following text]"and passive forest management" has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife. The combination of fire suppression, [add the following text] "passive forest management" and insect infestation has also resulted in stand conditions that are potentially more susceptible to high-intensity wildfires.

    c. Livestock Grazing, p. 45, desired conditions, 02, add: "Livestock grazing and associated management activities are compatible with and can enhance ecological functions and processes and the management of social resources, including designated areas."

    d. 251 Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage [add the following text] "in the short term, until precipitation or winds remove the dust."

    e. The following standard should be added: "Grazing privileges that are lost, retired, relinquished, canceled or have base property sold without transfer would have attached animal unit months held for watershed protection and wildlife habitat."

    f. Goal FW-GO-LGR-01: The Ashley National Forest will collaborate with livestock grazing permittees [add the following text] "onsite where appropriate with" [remove] "and" state, tribal and local governments to develop contingency plans that address wildfires, droughts, annual precipitation, or other events affecting the ability to graze allotments according to the terms and conditions of the permit. [add the following text] "The onsite visit may include explanations through examples shown onsite why grazing may be curtailed in a given season or for subsequent

seasons as needed." Goal FW-GO-LGR-02: The Ashley National Forest will collaborate with livestock grazing permittees, State tribal and local governments [add the following text] "onsite where appropriate" to develop monitoring methods and strategies and provide grazing management resources to permittees. [add the following text] "The onsite visit may include explanations through examples shown onsite, the process by which decisions have been made to curtail or increase grazing in a given season by the Forest."

g. Guideline FW-GL-LGR-01: To ensure sustainability and resiliency of forage resources limit utilization of key forage species (please reference here those "key forage species" you are referring to) to no greater than 50 percent of current year's growth, unless monitoring demonstrates a different allowable use level is appropriate. [add the following text] "Monitoring shall include a demonstration to the permittee in an onsite scenario where appropriate, or photographs at applicable sites with explanations to demonstrate current conditions at a given site. Guidelines FW-GL-LGR-02: To ensure sustainability and resiliency of forage resources in riparian areas, leave a four-inch or greater stubble height of palatable herbaceous species at the end of the grazing season between greenline and bank full of stream systems, unless monitoring demonstrates a more appropriate stubble height."

h. Goal FW-GO-LGR-01: The Ashley National Forest will collaborate with livestock grazing permittees onsite where appropriate and with State, Tribal, and local governments to develop contingency plans that address wildfires, droughts, annual precipitation, or other events affecting the ability to graze allotments according to the terms and conditions of the permit. An onsite visit should include explanations through examples shown onsite why grazing may be curtailed in a given season or for subsequent seasons as needed. Goal FW-GO-LGR-02: The Ashley National Forest will collaborate with livestock grazing permittees, State, Tribal, and local governments onsite where appropriate and possible to develop monitoring methods and strategies and provide grazing management resources to permittees. The onsite visit should include explanations, through examples shown onsite, of the process by which decisions have been made to curtail or increase grazing in a given season by the Forest.

i. 245 When compared with alternative A, alternative [remove] "B" [add the following text] "C" would use modern fire-planning tools to determine high-risk areas, which may offer some protection to timber stands suitable for production and harvest.

j. 249 Factors affecting livestock operations and range management on the Ashley National Forest are largely based on [remove] "market demand for livestock and" rangeland conditions, [remove] "both of" which [remove] "are" [add the following text] "is" based primarily on forage availability.

k. 251 Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage [add the following text] "in the short term, until precipitation or wind removes the dust."

l. 253 Fire and fuels management would continue to follow direction outlined in the [remove] "proposed" [add the following text] "existing" plan, though it would not use modern prediction and planning tools to determine high-risk areas.

m. Add the following desired conditions and guidelines to Livestock Grazing: "Forage, browse, and cover meet the needs of wildlife, and authorized livestock are managed in balance with available forage. Areas that are grazed have, or are trending toward having, satisfactory soils,

functional hydrology, and biotic integrity." "Grazing after fire (planned and unplanned ignitions) should be managed so as not to cause a trend away from the native or desired nonnative species desired condition. This may include deferment for one or more growing seasons following unplanned fire, which will be defined at the project level when restoration needs are assessed." "All new water developments shall provide for small mammal and bird escape and should be bat friendly." "All new or replacement fencing shall be wildlife friendly and allow the safe passage of both large and small wildlife species."

22. The plan should note that the market demand for livestock is based on consumer preference rather than forage availability.

23. Inconsistencies in the comparison of alternatives and acreage of treatments should be addressed.

24. The Forest Service should incorporate scientific literature for the effects of livestock grazing on streams, water quality, riparian areas, and terrestrial and aquatic animals.

25. The negative effects on vegetation from excluding livestock grazing from destination recreation management areas as well as the impacts to soils and vegetation from recreation users (including snowmobilers) should be analyzed.

26. The analysis area for livestock grazing on page 248 is 919,700 acres. This conflicts with the acreage of active allotments under alternative A (1,000,700 acres).

27. The Forest Service should review and include other scientific literature that identifies the effects of livestock grazing in riparian zones and adjust management in these areas to reduce overstocking and provide long-term rest. In addition, the Forest Service should partner with the State's Grazing Improvement Program to reduce impacts to water quality.

28. The role of wildfire, grazing, and browsing on conifer encroachment into vegetation communities should be more thoroughly analyzed by habitat, making sure to discuss the differences between vegetation communities (e.g., riparian vs. meadow wetlands vs. aspen) and making sure that the newest science is cited. In particular, the plan should explain why livestock grazing is expected to "minimally affect seral aspen communities" with a discussion of current conditions from microplot assessments. Overall, there needs to be more analysis by the Forest Service of the effects of grazing on forest health and the adverse consequences to fuels, fire cycles, fire intensity, insect infestations, infiltration, and nutrient cycling in any NEPA process for the Ashley National forest plan revision as well as in any other subsequently proposed grazing, resource extraction, and timber projects on the Ashley National Forest.

29. The Forest Service should include exceptions or on-site modifications for alternatives that have specific requirements, such as the percent utilization and stubble height requirements under alternatives B and C.

30. Alternatives should not be based upon voluntary waivers. Historical experience demonstrates that such waived allotments are rarely opened to future grazing.

Responses

1. Alternative B was modified to direct managers to establish forage use criteria during grazing allotment planning and to document these indicators in allotment management plans. Monitoring of grazing intensity through monitoring forage utilization has been used as tool to manage

livestock grazing for over a century. Site-specific monitoring data on allotments on the Ashley National Forest demonstrate that consistent use of key forage species greater than 50 percent of current year's growth promotes declines in rangeland conditions, including ground cover, forage vigor, and plant species diversity. The guidelines developed for forage use by domestic livestock also provide management flexibility in that the guidelines can be altered if monitoring demonstrates a different utilization level is appropriate.

2. There are no grazing restrictions proposed in existing designated wilderness areas on the Ashley National Forest, nor in the potentially preliminary administrative recommended wilderness areas in alternatives B and C in the draft EIS. Motorized access would be restricted if recommended wilderness area were to be designated wilderness areas by Congress.

3. The effects to specific resources are evaluated at the site-specific level, typically through NEPA analyses. Impacts to grazing would be evaluated when a specific project is analyzed, and the effects would be described. Mitigation measures, if necessary, can also be proposed for site-specific projects to decrease the effects on livestock grazing.

4. The draft EIS was reviewed for inconsistencies in the use of the words "closed," "exclude," and "utilization," and "utilization of key forage species," and the analysis was updated where appropriate.

5. Domestic sheep allotments and bighorn sheep overlap in very few areas on the Forest. Domestic sheep allotments are managed through direction in allotment management plans and annual operating instructions to prevent disease transmission through mitigation measures. Alternatives in the draft EIS address strategies to improve management of domestic sheep allotments to prevent disease transmission to bighorn sheep. Definitions such as "core native" and strategies to manage bighorn sheep are reserved to the individual States that have jurisdiction over wildlife management.

6. No alternatives in the EIS propose closing grazing allotments with the exception of alternative C, which would close portions of active grazing allotments where they intersect with destination recreation management areas. In these areas, permitted head months are estimated to decrease by 3 percent in the affected pastures or 0.14 percent across the Forest.

7. The full sentence the comment references is on page 249 of the draft EIS and reads, "Market demand for livestock products in the U.S. is expected to slowly decline over the coming decades but will surely remain an important economic contributor for the surrounding communities." The reference to a slow decline for livestock products in the U.S. is from Thornton (2010), "Livestock production: Recent trends, future prospects," which states that demand for livestock products is stagnating in developed countries. However, the draft EIS also states in chapter 3 (p. 196) that, for livestock numbers on the Ashley National Forest, "the analysis assumes that current market demand for livestock products would continue over the planning period with a continuing demand for grazing on the National Forest System lands."

8. The expansion of bighorn sheep populations is not under the jurisdiction of the Forest Service but is reserved to the individual States, which are responsible for the management of wildlife populations according to their State management plans. Plan components by alternative have been developed to mitigate disease transference between domestic and bighorn sheep.

9. The effects of domestic livestock grazing on ecological resources in relation to the forest plan alternatives are analyzed in the draft EIS in chapter 3, Affected Environment and Environmental Consequences, pages 29–177. This addresses the effects of livestock grazing on ecological resources, including air, soils, watersheds, aquatic ecosystems, riparian ecosystems, terrestrial vegetation, fire and fuels, plants, terrestrial and aquatic wildlife, and carbon sequestration. Site-specific effects from domestic livestock grazing are analyzed at the allotment level. The effects of grazing are also monitored through long-term monitoring to identify trends occurring within allotments. Current data demonstrate that most of the allotments on the Forest are meeting or moving towards desired conditions.

10. Stocking rates are adjusted through adaptive management informed by long-term monitoring at the allotment level. Stocking rates have been adjusted based on adaptive management on the Ashley National Forest for over a century. Domestic livestock grazing is managed annually based on current conditions, including drought, and stocking rates are adjusted accordingly. Long-term monitoring of rangelands on the Ashley National Forest to inform grazing management has been a better management tool than broad capability models that require arbitrary variables to predict livestock grazing capacity. Furthermore, there are currently no formal national or Intermountain Region manual or handbook directives that require specific grazing capability criteria to determine livestock capability on National Forest System lands. The inherent capability of lands on the Ashley National Forest to support livestock grazing is described by vegetation type in the terrestrial ecosystems assessment (Huber et al. 2017). Inherent capability has also been analyzed for individual grazing allotments through interdisciplinary site-specific NEPA analyses and authorized through associated agency decisions and subsequent term grazing permits.

11. Monitoring of grazing intensity through monitoring forage utilization has been used as a tool to manage livestock grazing for over a century. There are numerous scientific articles describing the benefits and lessons learned from using forage utilization as a management tool to manage grazing on National Forest System and public lands throughout the western United States, and different utilization thresholds have been established for particular regions. Site-specific monitoring data on allotments on the Ashley National Forest demonstrate that consistent use of key forage species greater than 50 percent of current year's growth promotes declines in rangeland conditions including ground cover, forage vigor, and plant species diversity, and consistent use of key forage species less than 50 percent of current year's growth allows for sustainable and resilient forage production. The guidelines developed for forage use by domestic livestock also provide management flexibility in that the guideline can be altered if monitoring demonstrates a different utilization level is appropriate.

12. Plan components in the revised forest plan guide the development of annual operating instructions. The Forest Service monitors allotments annually for permittee compliance with the terms and conditions of their term grazing permits. This information is available to the public upon request, generally through the Freedom of Information Act (FOIA).

13. The grazing management techniques and systems referenced by the commenter, including Straube (2017), Avertt et al. (2019), and Carter et al. (2011), were reviewed during the response to comments. Other references provided by the commenter including the Collaborative Group on Sustainable Grazing for U.S. Forest Service Lands in Southern Utah (2012), Clarry and Leininger (2000), Winward (2000), Hall and Bryant (1995) were used in the development of forage use guidelines by livestock in riparian areas for alternatives B and C. Site-specific monitoring data on allotments on the Ashley National Forest demonstrate that consistent use of key forage species

greater than 50 percent of current year's growth promotes declines in rangeland conditions, including ground cover, forage vigor, and plant species diversity, and consistent use of key forage species less than 50 percent of current year's growth allows for sustainable and resilient forage production. The guidelines developed for forage use by domestic livestock also provide management flexibility in that the guideline can be altered if monitoring demonstrates a different utilization level is appropriate. The management of elk and other wildlife populations is under the jurisdiction of the states of Utah and Wyoming on the Ashley National Forest. Habitat is monitored and vegetation and other resource trends are recorded by the Forest Service, and this information is shared with the States to inform their management of wildlife population numbers. Objectives were developed for alternatives B and C that describe quantitative thresholds for use of forage species to provide residual cover for wildlife species. Alternative D also has an objective to limit utilization of key forage species to meet desired conditions for soils and terrestrial vegetation. Stocking rates of livestock are authorized annually through the terms and conditions of a term grazing permit based on current conditions, including variables such as drought.

14. The benefits of maintaining sagebrush communities on the landscape, including benefits to livestock and wildlife, are described in chapter 3, Affected Environment and Environmental Consequences (pp. 94–97). Control of woody encroachment can maintain sagebrush communities, especially in the absence of fire. The benefits of controlling woody encroachment to maintain sagebrush communities and the range of treatment is described by alternative on pages 103–121 of the same chapter.

15. Monitoring of grazing intensity through monitoring forage utilization has been used as a tool to manage livestock grazing for over a century. There are numerous scientific articles describing the benefits and lessons learned from using forage utilization as a management tool to manage grazing on National Forest System and public lands throughout the western United States. Site-specific monitoring data on grazing allotments on the Ashley National Forest demonstrate that consistent use of key forage species less than 50 percent of annually year's growth in most of the upland vegetation types and consistent use over 4 to 6 inches of stubble height in riparian and meadow vegetation types promotes sustainable ground cover, species diversity, and plant vigor and resiliency. The guidelines developed for forage use by domestic livestock provide management flexibility in that the guidelines can be altered if monitoring demonstrates a different utilization level is appropriate, including in a specific vegetation type. The reports cited in the comment from the Inyo National Forest have been reviewed, and these reports as well as site-specific monitoring data were used to inform forage utilization guidance in the draft plan.

16. The benefits of grazing are described under the social and economic sections of the draft EIS (pp. 186–216). Although benefits to natural resources have been demonstrated mostly on private land where domestic livestock can be moved through certain areas more quickly and routinely, those beneficial impacts have not been apparent on the Ashley National Forest to the degree that they could be documented.

17. The development of plan components for the alternatives and analysis in the draft EIS was accomplished by an interdisciplinary team composed of qualified specialists who have professional experience in their fields. This includes the development of plan components and analysis of the impacts of domestic livestock grazing on the Ashley National Forest. Proper use guidelines for the alternatives were developed using summaries from long-term monitoring data that indicate thresholds for impacts on allotments across the Ashley National Forest. Site-specific

monitoring data on allotments on the Ashley National Forest demonstrate that consistent use of key forage species of less than 50 percent of annual growth in several different vegetation types and consistent use of over 4 to 6 inches of stubble height in riparian areas promote sustainable ground cover, species diversity, and plant vigor and resiliency.

18. The issue of annual percent bank trample was not specifically addressed in the draft EIS, but there are plan components that adequately address and mitigate for bank alteration. These include desired conditions in the Watershed, Aquatic, and Riparian Ecosystems section for alternative B and stubble height guidelines for riparian areas in the Livestock Grazing section for alternatives B and C. These plan components were addressed by alternative in the draft EIS.

19. A reasonable range of alternatives was developed based on input from the interdisciplinary team and the public. Destination recreation management areas were developed based on this response, and no grazing in these areas is part of one alternative (alternative C). Alternatives A, B, and D do not close grazing in portions of allotments in destination recreation management areas.

20. Portions of allotments would be closed in destination recreation management areas under alternative C. The economic effects of closing portions of active grazing allotments under alternative C are described in the draft EIS on page 210. In summary, assuming the reduction in permits is proportional to the pasture area affected, total permitted head months are estimated to decrease by 3 percent in the affected pastures, or 0.14 percent across the Forest. This reduction does not result in a meaningful impact on the regional economy, but it would affect individual permittees.

21. a. The 2012 Planning Rule requires that monitoring information enable the responsible official to determine if a change in plan components or other plan content is needed and whether progress is being made toward meeting desired conditions, objectives, or other plan components in the plan. Not all plan components need to have a corresponding monitoring question (§ 219.12(1),(2)(vii)). For the addition of head months as an annual indicator, there would need to be a desired condition that provides an adequate description of when the indicator is met or the purpose in tracking the indicator. The desired condition most relevant to adding head months as an indicator is in alternative B, which states that "Sustainable rangelands provide forage for livestock grazing that contributes to the agricultural economy and local employment and supports traditional lifestyles, cultural values, and generational ties to the land" (FW-DC-GRAZ-01). Although head months does not measure forage, it may inform the contribution of livestock grazing to the local economy. However, there is no threshold or benchmark that would indicate whether the desired condition is met or how many head months forestwide would be required to meet the desired condition. In addition, head months are already tracked annually in other Forest Service databases.

    b. When the accumulation of biomass and increases in the number of trees through ingrowth and accretion exceed what is being removed through natural processes and management actions, forested areas become more susceptible to bark beetle outbreaks and high-intensity wildfires. Bark beetle outbreaks and periods of increased wildfire activities have historically been cyclic. Often these events are correlated with certain weather patterns. It is difficult to quantify the contributions of past and present forest management activities to possible recent increases in bark beetle outbreaks and high-intensity wildfires. Some of these recent increases could just be due to the cyclic nature of these events.

    "Passive forest management" is a subjective term without a precise definition. This term seems to

imply an intent to limit forest management activities that could possibly reduce the undesirable effects of bark beetle outbreaks and undesirable wildfires. It fails to recognize other factors, such as physical constraints, regulatory restrictions, competing uses, and economic constraints, impacting the level of forest management activities. Therefore, "passive forest management" has not been included in the list of causal agents of bark beetle outbreaks and high-intensity wildfires as requested.

"Passive vegetation management" is a term used in the draft EIS. Passive vegetation management allows for natural forest succession and relies primarily on natural processes, such as wildfire, for changes to vegetation structure. It is used most often in association with alternative C in the draft EIS.

c. Desired conditions under alternative B (FW-DC-LGR-01 and 02) describe the compatibility of livestock grazing with ecological functions and management of social resources. These desired conditions also describe conditions that provide forage to contribute to the agricultural economy. These desired conditions provide a range of alternatives described in the comment.

d. On page 251 of the draft EIS under Effects from Sustainable Recreation, the following language has been added to the sentence: "Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage [add the following text] "in the short term, until precipitation or winds remove the dust."

e. The Forest Service permits domestic livestock based on occupancy of National Forest System lands that is calculated using head months, not animal unit months (AUMs). Holders of a term grazing permit (permittees) are billed annually according to the number of head months occupying an allotment. If a permittee does not put livestock on an allotment for any reason, there is no occupancy and therefore no head months would exist that could be associated with issues related to watershed protection or wildlife habitat.

f. Goals are generally broad statements of intent, usually related to process, and are expressed in broad, general terms. Requiring collaboration to "onsite" meetings and demonstrations in the field decreases flexibility of the plan and the ability to engage in collaboration in a variety of settings and processes. No modifications were made to the goals in Goals (FW-GO-LGR).

g. Key forage species are identified at the allotment level in the allotment management plan. Key forage species are generally the most palatable and highly selected forage species but can vary based on dominant vegetation types, elevation, and ecological conditions and are therefore best determined at the allotment level during allotment management planning.

h. This comment is the same as f (see the response above under 21f).

i. This comment is the same as issue statement 4 under Timber (see the response there).

j. This comment is the same as 7 (see the response above under 7).

k. This comment is the same as d (see the response above under 21d).

l. The draft EIS was updated and "proposed" was changed to "existing" plan.

m. The following guideline was added to alternative B modified (preferred alternative). "To ensure sustainability and resiliency of ecological conditions, describe grazing management

strategies in allotment management plans. Use annual monitoring indicators as well as multi-year vegetation trend data to determine if allotments are meeting desired conditions as described in FW-DC-VEGNF and to inform and modify grazing management strategies such as time, timing, and intensity, when necessary to meet or move toward desired conditions." This guideline references FW-DC-VEGNF, which describes desired conditions for non-forest vegetation and includes desired conditions for species composition and diversity, ground cover, and recovery from the effects of fire.

22. The draft EIS states: "Factors affecting livestock operations and range management on the Ashley National Forest are largely based on market demand for livestock and rangeland conditions, both of which are based primarily on forage availability (p. 249). The phrase "consumer preference" refers to what partly drives market demand; therefore, changing the wording is not necessary.

23. Inconsistencies in the comparison of alternatives and acreage of treatments have been reviewed and changed if necessary.

24. The draft EIS evaluated the effects of livestock grazing, in relation to plan components in the alternatives, on streams, water quality, riparian areas, and terrestrial and aquatic animals using the best available scientific information. This information is cited in chapter 3, Affected Environment and Environmental Consequences, pages 55–84 and 143–179. The literature provided in comments related to the effects of livestock grazing on streams, water quality, riparian areas, and terrestrial and aquatic animals was reviewed, and information found in Clary and Webster (1989), Platts (1989), Dobkin et al. (1998), Sada et al. (2001), Myers (1989), Herbst et al. (2012), Earnst et al. (2012), Batchelor et al. (2015), Carter et al. (2017), and Myers et al. (2017) was considered in the development of plan components. Site-specific data was also used to provide descriptions of current conditions of ecological resources.

25. Recreation opportunities and settings and thus experiences often decline with the presence of livestock grazing due to the presence of livestock waste and trails and camping areas affected in other ways by livestock grazing. The benefits of livestock grazing have been demonstrated through intensive management of pasture rotation on private lands, which is generally not feasible in Forest Service grazing systems.

    The effects to vegetation (positive or negative) in recreation destination areas that would be closed to livestock grazing would be minimal because permitted head months are estimated to decrease by only 3 percent in the affected pastures or 0.14 percent across the Forest (draft EIS, p. 255). The effects to all resources associated with no livestock grazing in destination recreation management areas are addressed in chapter 3 in the Affected Area and Environmental Consequences section of the draft EIS.

    The Forest Service has reviewed the abstract of the suggested citation on the impact of snowmobiling (Wanek and Schumacher 1975). Due to high snowpack use, the potential impacts to soil resources do not apply to the Ashley National Forest and are adequately addressed in the EIS.

26. The correct number of acres is 919,700. This has been corrected in the final EIS.

27. Scientific literature used to evaluate the effects of livestock grazing on riparian zones is referenced in chapter 3, Affected Environment and Environmental Consequences (pp. 69, 70, 71). In addition, data from long-term monitoring sites in riparian areas on the Ashley National Forest

were used to inform the analysis and also described in the Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest (Forest Service 2017, pp. 9–35) and in the Air, Soil, and Watershed Resources Report (Bevenger 2017). Collaboration with State initiatives such as the Utah Grazing Improvement Program occurs on the Forest, and goals were developed to continue this collaboration (i.e., alternative B goals FW-GO-GRAZ-01 and 02).

28. The effects of drivers and stressors, including domestic livestock grazing, were evaluated in the draft EIS on pages 92–94, and the environmental consequences by alternative were evaluated on pages 104–122. Desired conditions for aspen (FW-DC-ASPEN-01 and 02) are consistent with plan component requirements found in the 2012 Planning Rule at 36 CFR 219.7(e). Aspen desired condition statements consist of specific ecological characteristics applicable for that community type. These include structure, ecological function, distribution, composition, species richness, ground cover, sustainability, and resilience. These are either measurable or they at least have detectable qualities. Aspen desired conditions include benchmarks or thresholds so assessments to determine condition, trend, compliance to or departure from desired condition can be made. Furthermore, guidance is given in plan components FW-GD-ASPEN-01 through 04 for recently disturbed aspen communities. These forestwide mitigations reference vehicle disturbances, livestock grazing, and aspen treatment strategies. Additional site-specific mitigation measures would be designed, analyzed, and implemented at the project level. Forest plan aspen guidelines were developed from analysis conducted during the forest plan assessment. The Ashley National Forest cited hundreds of studies, referenced from approximately 22,500 study points, that are applicable to aspen. This data is considered best available science.

29. Alternative B was modified to direct managers to establish forage use criteria during grazing allotment planning and document these indicators in allotment management plans. In addition, plan direction in alternative B does provide for exceptions and on-site modifications if monitoring demonstrates a different allowable use level or stubble height is appropriate.

30. Plan components to mitigate disease transmission between domestic and bighorn sheep and to collaborate with the State to minimize risk of contact between the species were developed to provide conservation measures for bighorn sheep, which is a species of conservation concern. Voluntarily waiving a term grazing permit with no preference was identified in three of the four alternatives as a mechanism to provide an opportunity to implement mitigation measures for separation of domestic and bighorn sheep. Allotments can be opened or closed administratively or through an agency decision.

Maps and Figures

Letter numbers 24, 62

Issue Statement

1. The Forest Service should include a map by the Environmental Protection Agency of what is considered “Indian Country,” as referenced in the draft EIS on page 61.

Response

1. The term “Indian Country” is defined in 18 U.S.C. §1151. The statutory text as applied to the Ashley National Forest is “all land within the limits of any Indian reservation under the jurisdiction of the United States Government.” Figure 3-22 on page A-45 of appendix A shows

the extent of the original reservation boundary, which is synonymous with the lands that are "Indian Country." A cross-reference to this map has been added to the final EIS.

Migratory Bird Treaty Act

Letter numbers 18, 64

Issue Statements

1. The Forest Service should follow several migratory bird conservation measures, including completing projects outside of migratory bird nesting season, conducting migratory bird nest surveys in proposed project areas, preventing migratory birds from establishing nests in proposed project areas, and, for projects that must occur in migratory bird nesting areas, adding a buffer around nests and having a biologist confirm that all young have fledged before ground activities within the buffer continue.

2. The Forest Service should include the role of the Migratory Bird Treaty Act. The following guideline is proposed: "Vegetation management activities or disturbance to vegetation shall follow best management practices to avoid and minimize impacts to migratory birds listed by the Migratory Bird Treaty Act."

3. The Forest Service should consider the recommendations for migratory bird conservation (USFWS 2020) when implementing actions that may adversely affect migratory birds. The Conservation of Migratory Birds, Bald and Golden Eagle Protection Act (BGEPA) affords eagles additional protections beyond those provided by the Migratory Bird Treaty Act.

Responses

1. A plan component (FW-GD-WILDL-14) for migratory birds has been added to the plan that would mitigate activities to lessen impacts to U.S. Fish and Wildlife Service birds of conservation concern. It is impractical to have an avoidance time period during the suggested maximum migratory bird nesting season from December through August. This leaves only 3 months out of the year for implementation, which in many instances would be difficult or impossible to complete because of snowfall during those three months.

2. A plan component for migratory birds has been added to the plan. There is no need to repeat the Migratory Bird Treaty Act in the plan. Doing so would be unneeded repetition of applicable law that the Ashley National Forest is required to follow.

3. A plan component (FW-GD-WILDL-14) for migratory birds has been added to the plan that would mitigate activities to lessen impacts to U.S. Fish and Wildlife Service birds of conservation concern. There is no need to repeat the Bald and Golden Eagle Protection Act or the Migratory Bird Treaty Act in the plan. Doing so would be unneeded repetition of applicable law that the Ashley National Forest is required to follow.

NEPA Planning

Letter numbers 64, 74, 128

Issue Statement

1. Ashley National Forest staff should be well versed in the National Environmental Policy Act, resource topics, and the Federal government's style manual.

2. The Forest Service should identify the preferred alternative, but the analysis should not be pre-decisional, as appears to be the case for alternative B.

3. The interdisciplinary program lead for the Cultural and Heritage section of this forest plan revision has submitted individual comments on the draft plan during a public comment period. There is a concern about a potential conflict occurring when an interdisciplinary team member who is helping to draft a plan and the draft EIS is also submitting individual public comments in an attempt to sway the decision of the Forest Service.

Response

1. The Forest Service is required to follow all existing laws, regulations, and policies relating to the management of national forest lands. Forest plan direction is designed to supplement existing direction and not repeat said direction. The forest plan is consistent with the National Forest Management Act, the Multiple-Use Sustained-Yield Act, NEPA, and other laws. The 2012 planning regulations replaced the 1982 planning regulations.

2. The Forest Service did not identify a preferred alternative at the time of the draft EIS because it simply did not have a clearly identified preferred alternative. Through careful consideration of the comments received, a preferred alternative (alternative B modified) has been identified that is within the range of alternatives analyzed in the draft EIS. The responsible official carefully considered designated area as well as other allocations to determine the mix of land and resource uses that would best meet public needs. Alternative B modified is the result of robust public engagement efforts since 2016 and responds to the identified purpose for a revised, integrated set of plan direction consistent with the 2012 Planning Rule.

   The Forest Service is required to follow all existing laws, regulations, and policies related to the management of national forest lands. The forest plan is consistent with the National Forest Management Act, NEPA, and other required policies and laws. The opportunities for public participation were developed early on in the planning process due to the requirement under the 2012 Planning Rule that the forest plan revision be both collaborative and science based. A number of community members participated in the collaborative effort, which is reflected in the forest plan.

3. The planning team reviewed all submitted comments, and none were submitted by any individual claiming to represent the Forest Service or any Forest Service program. Numerous individuals provided comments representing their personal views, which is appropriate during a "public comment period." Comments are always welcome from any individual who wishes to comment during a public comment period. Even Forest Service employees can exercise their First Amendment right to provide public comments as long the comments do not disclose nonpublic information or reference the employee's position, in compliance with ethics rules in 5 U.S.C. 2635 Part G. The Forest Service does not remove or censor any public comments because a different commenter may disagree with its views or perceive there is a conflict.

Other

Letter numbers 68, 113, 125

Issue Statements

1. Regarding Executive Order 140008, the 30x30 initiative, the Forest Service should consider whether conservation commitments are needed to achieve the goal in Section 216 of Executive

Order 14008 of conserving 30 percent of the nation's lands and waters by 2030. (2) The Ashley National Forest is currently managed as almost 60 percent roadless, 30 percent congressionally designated recreation management area, and almost 20 percent congressionally designated wilderness, which far exceeds any goals for the executive order. The only alternative that complies with Executive Order 14008 is alternative D as the Ashley has exceeded the 30 percent threshold and also must improve recreational access. The relationship of the mandate of Executive Order 14008 to portions of the proposal simply cannot be overlooked, as exemplified by the requests of local communities that are seeking to add motorized routes on the Ashley National Forest, as the draft EIS indicates there are only 187 miles of trail (or 15 percent) on the Forest. This is insufficient to support the usage that the Forest will be seeing in the near future.

2. The congressionally mandated Forest Service National Trails Strategy only aligns with alternative D of the Proposal. the Forest Service does not mention this strategy.

Response

1. The Executive Order on Tackling the Climate Crisis at Home and Abroad includes the following: "It is the policy of my Administration to put a new generation of Americans to work conserving our public lands and waters. The Federal Government must protect America's natural treasures, increase reforestation, improve access to recreation, and increase resilience to wildfires and storms, while creating well-paying union jobs for more Americans, including more opportunities for women and people of color in occupations where they are underrepresented." The executive order also includes the "goal of conserving at least 30 percent of our lands and waters by 2030." The Forest Service does not have specific guidance related to achieving this general goal.

   The focus of the revised forest plan is on sustainability. The 2012 Planning Rule, which the plan is being revised under, requires the inclusion of plan components, including standards or guidelines, that address social and economic sustainability, ecosystem services, and multiple uses integrated with the plan components for ecological sustainability and species diversity. The responsible official recognizes the importance of recreation on the Forest, as well as the need to improve access to recreation, while balancing the other goals, including the major purpose of the executive order about intact ecosystems related to climate change. Alternative D emphasizes multiple uses and a more active management approach to achieve or move towards desired future conditions and social, economic, and ecological sustainability. Greater emphasis is placed on the use of timber harvest and fire and fuels management to achieve desired conditions. Alternative D has the most acres suitable for timber production and available for timber harvest, as well as for motorized access. The responsible official carefully considered a range of recommended wilderness areas, as well as other allocations, to determine the mix of land and resource uses that would best meet public needs. The Forest Service recognizes the advantages of blending certain elements of the different alternatives. In response to public comments, alternative B modified has been selected as the preferred alternative. Refer to chapter 2 of the final EIS for a description of the modifications to alternative B.

2. A reference to and use of the National Strategy for a Sustainable Trail System has been incorporated into the final EIS. All of the action alternatives (B, C, and D) include plan components that pertain to partnership, and one is specific to trail maintenance and development, FW-GO-TRAIL-01, which states: "Strategies are developed and carried out to significantly increase the roles of communities, partners, and volunteers in planning, developing, and maintaining motorized and nonmotorized trails." There are a number of objectives in alternatives B and D that focus on improving trails and expanding recreation opportunities. In addition, the

plan includes this management approach: "Develop and carry out strategies to significantly increase the roles of communities, partners, and volunteers in planning, developing, and maintaining motorized and nonmotorized trails." The revised plan also includes recreation management areas. Alternative B modified includes all of the destination recreation management areas that were identified in alternative D. With the increasing numbers of recreationists, the Forest faces the task of managing the land in a way that offers a wide spectrum of opportunities while minimizing conflict between different uses and minimizing the effects on the environment.

Planning Rule

Letter numbers 64, 126

Issue Statements

1. The forest plan should contain standards and guidelines for each desired condition and objective. The draft plan does not implement standards and guidelines needed to achieve desired conditions or objectives, avoid undesirable effects, or meet legal requirements. Furthermore, the forest plan should have objectives for every resource topic, and they should be concise, measurable, and time specific.

2. The draft plan fails to determine suitability as required by 16 U.S.C. 1604(e)(2).

Responses

1. The revised forest plan provides an integrated set of management direction (or plan components) that provide for the social, economic, and ecological sustainability and multiple uses of the Forest's lands and resources. Management of National Forest System lands is guided and constrained by other laws, regulations, policies, executive orders, and procedures in the Forest Service directives system (manuals and handbooks). These are generally not repeated in forest plans. Plan components may be used to carry out laws, regulations, or policies but do not repeat existing direction from laws, regulations, or directives. The plan includes forestwide designated area and management area desired conditions, objectives, standards, and guidelines, monitoring questions and indicators, as well as other plan content such as management approaches. The planning team developed management direction for each resource. There are differences in the number and type of plan components by section based on the needs for managing those resources. Based on comments received, there have been modifications made to the plan; refer to the section that describes changes made between draft and final, which indicates where new plan components were added.

2. Your comment on the inclusion of suitability in the revised plan resulted in the review of suitability components in the plan As noted: "The suitability of lands need not be identified for every use or activity. Suitability identifications may be made after consideration of historic uses and of issues that have arisen in the planning process. Every plan must identify those lands that are not suitable for timber production (§ 219.11)." Suitability for timber production is identified (see appendix D of the plan). Additional information about suitability is in chapter 3 of the plan. Suitability plan components are included for the following designated areas: High Uintas Wilderness, research natural areas and inventoried roadless areas, as well as the recreation management areas. In some cases, standards establish suitable uses, such as for eligible and suitable wild and scenic rivers as well as for the High Uintas Wilderness.

Planning Rule – Adaptive Management

Letter number 125

Issue Statement

1. A draft adaptive management strategy or framework should be included with the final EIS or record of decision, which should include evaluation of ongoing effectiveness of forest plan management objectives and should establish quick reaction to newly discovered concerns.

Response

1. The Forest Service has modified chapter 4 of the revised plan to integrate an adaptive management strategy into the monitoring program. In addition, both the final EIS and draft record of decision discuss the use of adaptive management strategies.

Planning Rule – Best Available Science/Data

Letter numbers 60, 64, 72, 123, 126

Issue Statements

1. The Forest Service should incorporate the findings from the 2021 study for areas of high ecological value on the Ashley National Forest developed by Conservation Science Partners. While there is some overlap between high ecological value areas and areas proposed for conservation-oriented management in the draft plan (e.g., near Goose Egg Peak), the forest plan revision team should reconsider the proposed management where there is not alignment.

2. The Forest Service should incorporate scientific literature on the effects of motorized routes on ecosystem processes, such as increased erosion, habitat destruction, soil and water pollution, noise pollution, exotic invasions, and wildlife disturbance, elimination, and dispersion.

3. The Forest Service should incorporate scientific literature on the effects of vehicle travel and livestock grazing on streams, water quality, riparian areas, and terrestrial and aquatic animals.

4. PowerPoint presentations provided by Forest Service staff that are summaries of existing reports or peer-reviewed research are not the best sources of information. The final EIS should reference the original source the information came from.

5. The forest plan should include scientific information on carbon sequestration and storage capabilities of all terrestrial and aquatic ecosystems.

Responses

1. The planning team has reviewed the report titled Ecological Value of Lands in the Ashley National Forest (Conservation Science Partners 2021). As noted in the report, the Ashley National Forest does include “high ecological value areas,” with indicators including total carbon, climate resilience, imperiled species richness, vertebrate species richness, ecological intactness, ecological connectivity, and vegetation diversity. A number of high ecological value areas identified in the report are within inventoried roadless areas, backcountry recreation management areas, or other designated areas. These areas have management direction including desired conditions and suitability for specific uses. For example, inventoried roadless areas are not suitable for road construction or timber production, contributing to intact ecosystems and ecological connectivity (refer to chapter 3, Area Direction, of the plan).

More broadly, the revised plan addresses ecological sustainability and diversity of plant and animal communities through desired conditions, standards, guidelines, goals, and management approaches. The plan addresses maintaining habitat for the long-term persistence of wildlife, including at-risk species, throughout the Ashley National Forest. Forestwide direction addresses habitat for migration corridors needed by wildlife species during migration events.

2. The EIS documents effects of motorized routes on ecosystem processes. Section 219.3 of the 2012 Planning Rule requires the responsible official to use best available scientific information and to determine what is most accurate, reliable, and relevant. Regarding the best available scientific information, the planning team used available peer-reviewed articles and data for which "reliable statistical or other scientific methods have been used to establish the accuracy or uncertainty of any findings" (Forest Service Handbook 1909.12 chap. Zero Code, sec. 07.12). Scientific information that may be considered best available scientific information also includes expert opinion, panel consensus, inventories, or observational data prepared and managed by the Forest Service, other Federal agencies, universities, national research networks, other reputable scientific organizations, and data from public and governmental participation. This information may include monitoring results, information in spatially referenced databases, data about the lands and resources of the planning unit, and various types of statistical or observational data. The reference sections in the final EIS include the best available scientific information.

3. The EIS documents effects of sedimentation from livestock grazing and roads on aquatic ecosystems and wildlife. The reference sections in the final EIS include the best available scientific information. The assessment documents contain relevant information and sources related to this concern, specifically the Air, Soil, and Water Resources Report (Bevenger, 2017) and the Aquatics Report (Plunkett, 2017). They include references considered best available scientific information. The literature referenced by the commenter was reviewed, but the literature did not contain any new information other than what was already considered in the development of plan components for the proposed plan.

4. The presentation by Goodrich and Huber (2017) describes

> the vegetative condition for the allotments based on long-term studies permanently established. Trend and condition were determined from those studies that have been revisited at least once following establishment. Condition without trend is indicated from some studies with a single visit. 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, cross section, and greenline. Older study types that provide background information but are not currently used include site analysis and Parker 3-Step. (p. 2)

The presentation of the summary of condition and trends for several allotments on the Ashley National Forest is in a PowerPoint presentation format. On the Ashley, every livestock grazing allotment has a similar report (in the PowerPoint format) that describes condition and trend exclusively for that allotment. The several case studies found in the 2017 reference originate from several individual allotment reports. The individual allotment reports are principally developed from photographs, data, and notes derived from the Ashley National Forest's vegetation monitoring inventory. Individual allotment reports contain a slide listing the references cited, which cites all applicable reference materials including other reports, publications, and data.

5. The documentation and analysis in the final EIS related to the subject of carbon sequestration has been expanded; refer to the carbon sequestration discussion in the final EIS for additional information that addresses this issue.

Planning Rule – Monitoring

Letter numbers 123, 125

Issue Statement

1. The Forest Service should include the monitoring guide and an adaptive management strategy or, at a minimum, a draft of these, with the Final EIS. Using the Conservation Alternative monitoring protocol developed for the Manti-La Sal National Forest would be helpful. Providing additional information on the monitoring protocol and the adaptive management strategy during the NEPA process will allow for stakeholder coordination. The adaptive management program should include an evaluation of the effectiveness of ongoing forest plan objectives.

Response

1. The Conservation Alternative developed for the Manti-La Sal National Forest was reviewed.[3] The commenter specifically requests that the Forest Service consider elements of this Conservation Alternative related to the proper monitoring protocol. The Forest Service has updated chapter 4, Plan Monitoring Program, of the plan. Information about adaptive management has been added. The plan components being monitored are now included. A number of the monitoring questions and indicators align with the suggested protocol.

Public Involvement and Collaboration

Letter number 58

Issue Statement

1. The Forest Service should consider inclusion of educational opportunities such as workshops, field trips, literature, youth programs, and other methods to educate the general public in ecological forest use and good stewardship of the national forests.

2. The Forest Service should promote nonmotorized and motorized recreation on the Ashley National Forest through more user-friendly maps that include roads, trails, mountains, streams, lakes, elevations, etc.

Response

1. The alternatives presented in the draft EIS contain plan components in the Visitor Education and Interpretation section that direct Forest Service staff to conduct educational and interpretive programs for the public throughout the Forest. Many other resource sections in the plan also give direction and guidance to conduct educational opportunities and programs.

2. The Ashley National Forest and the surrounding communities promote all types of recreation on the Forest. Many of the plan components presented in the draft EIS promote both motorized and nonmotorized recreation where appropriate across the landscape. Specific direction related to

[3] This is available at https://www.mantilasalconservationalternative.org/.

information included on maps is not meant to be included in the forest plan. This will be addressed by each program area as resource-specific maps are developed.

Recreation

Letter numbers 19, 20, 24, 39, 62, 64, 65, 74, 90, 109, 112, 114, 116, 123, 135, 183

Issue Statement

1. The Forest Service should consider the access needs of disabled users in drafting the alternatives and ensure that people with disabilities who depend on motorized means do not lose access. Outdoor enthusiasts with ambulatory or mobility impairment disabilities rely on motorized travel as their sole means to enjoy recreating on public lands. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. Loss of access for those with ambulatory or mobility impairment disabilities would be in violation of the Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government because the Forest Service would fail to provide equality of outcome for disabled recreationalists. Additionally, since the elimination of motorized access from the plan area would prevent disabled tribal members from accessing sacred and cultural sites, the motorized restrictions in alternative C would likely be contrary to Executive Order 13007, Executive Order 13985, and the American Indian Religious Freedom Act.

2. New recreational products are likely to emerge over the lifetime of the forest plan. The Forest Service should stipulate that new recreation technology would be fully analyzed and, as long as it meets established standards, would be allowed.

3. The Forest Service should support shared use. As long as overall visitation numbers are appropriate for the affected resources, motorized and nonmotorized users can be compatible with one another. Motorized and nonmotorized recreation use often overlap as off-highway vehicles often increase accessibility to nonmotorized recreational activities such as hiking, camping, and equestrian use. To prevent and avoid adverse resource impacts and user conflict, the Forest Service should be actively managing the area and routes. Through different management strategies and proper education, negative impacts can be properly mitigated without closures. As the popularity of outdoor recreation grows, the Forest Service should be looking at ways to provide reasonable access that will sustain the growing numbers of visitors. Additional loops and routes for motorized activities should be used to accommodate the increase in use and to mitigate negative impacts.

4. The Forest Service should provide numbers and expected trends to justify the assumption of moderate to heavy levels of dispersed recreation projected for the Ashley National Forest (chapter 2, p. 15). It is important for the reader to know what the increase in visitation is and how recreation use has changed. The Forest Service should also provide the change in socioeconomic value to the surrounding community, which would be helpful in judging the direction the Forest needs to go with its planning goals, desired conditions, and objectives.

5. The Forest Service should define goals for desired types of visitation increase. Goals should take into account where visitors are coming from, State and local government plans to enhance outdoor recreation opportunities and industry, potential socioeconomic benefit for Forest-area residents and visitors, and the possibility of creating destination-quality motorized and nonmotorized trail networks.

6. The Forest Service should make allowances in the forest plan for a future downhill ski resort in Daggett County or the Vernal area along Highway 191 or Highway 44 because of the economic and recreational benefits to local communities.

7. The Forest Service should consider the following facts and management strategies to minimize the impacts of recreational use on the ecosystem of the Ashley National Forest:

   - Literature suggests that concentrating visitor use in previously impacted or hardened sites and trails will likely be a successful management strategy, while dispersal strategies may result in a proliferation of recreation disturbance.

   - Management strategies and actions that concentrate visitor use to minimize vegetation and soil impacts can be employed in a similar way to minimize wildlife impacts.

   - Wildlife often adapt to consistent, non-threatening recreational activities. Containment strategies that spatially concentrate use on formal trails and impact-resistant recreation sites can limit negative wildlife impacts.

   - Modifying the location and timing of use, such as shifting trails and recreation sites away from areas of high-quality wildlife habitat to areas of lower-quality habitat, is also an effective strategy.

   - Off-trail activities can be discouraged or prohibited in particularly sensitive areas or during sensitive times, such as through temporary prohibitions on use near a bird rookery or nest.

   - If any alterations in recreation use or new trail, road, or facility development may expand use into new areas, the Forest Service should fully consider how they will affect habitat fragmentation, critical habitat, migration corridors, the effective size of habitat patches, and other landscape-level concerns.

8. The Forest Service should manage water-based and shoreline recreation activities in freshwater river and lake environments to minimize the potential inputs of pollutants (e.g., sunscreen, food scraps, pathogens, sediment runoff from trails and recreation sites) and direct trampling disturbance of shorelines and littoral zones (land areas closest to the water). This is particularly important in oligotrophic (nutrient-poor, low-productivity) lake ecosystems common to high mountain environments but may be less vital to high-volume river systems on the Colorado Plateau. Research suggests a linear relationship with use and some response variables such as E. coli bacteria (Hadwen et al., 2010; Monz et al., 2013). Therefore, in some spatially limited, high-use settings, limiting total numbers of recreationists at any one time may be an effective strategy.

9. The Forest Service should update the recreation section to add more objectives, guidelines, and strategies to meet the many desired conditions.

10. The forest plan should include options for developing additional motorized and nonmotorized trails.

11. The forest plan should change motorized trail designations to allow for larger utility terrain vehicles, which are increasing in popularity.

12. The forest plan should increase the maintenance and improvement of facilities. Failure to maintain facilities such as trails, roads, and campgrounds should not be used as an excuse for closure. The plan should recognize that maintenance is essential to the new recreation-based economy for rural communities.

13. The Forest Service should clarify whether electric bicycles (e-bikes) are considered motorized travel or mechanized travel and whether they would be permitted in special designation areas on the Ashley National Forest.

14. The Forest Service should clarify how the 113,000 acres that would be closed for special use authorizations was calculated.

15. The Forest Service should review the data and analysis in the socioeconomic section related to wilderness, including statements that "users looking for solitude may have limited opportunities" on page 206 and statements that "communities valuing solitude and naturalness for cultural uses may have limited options." There are at least 275,175 acres in the High Uintas Wilderness and additional roadless areas.

Responses

1. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. The Forest also identifies areas where there are recreational opportunities free from the sights and sounds of motorized use for recreationalists who prefer those settings. Although some areas do not include motorized trails or roads, other areas on the Ashley National Forest offer a similar recreation experience that can be accessed by motorized vehicles.

2. Due to unknown future changes in technology and recreation equipment, a blanket statement regarding approval is not appropriate as standards and definitions may change over time.

3. There are many places on the Ashley National Forest where motorized and nonmotorized recreational opportunities overlap. The Forest also identifies areas where there are recreational opportunities free from the sights and sounds of motorized use for recreationalists who prefer those settings.

4. The level of dispersed recreation has been steadily increasing on the Ashley National Forest. This information has been identified from observations by Forest Service field-going personnel and at specific areas, such as the Green River below the Flaming Gorge Dam, where the number of visitors can be accurately counted. It is not possible to capture all of the dispersed recreation use on the Forest.

5. The Ashley National Forest seeks to enhance recreation opportunities and settings for all visitors to the Forest. The type and location of the enhancements may draw visitors from different locations depending on the desired recreational activity they wish to participate in. FW-DC-ROS-02 describes the desired condition to provide outdoor recreation settings, opportunities, and experiences for year-round activities that provide a sense of place for both community residents and visitors. The forest plan includes other plan direction for roads, trails, and recreation facilities to provide project direction and assist in identifying mitigation measures.

6. Nothing in the proposed forest plan would expressly prohibit a future downhill ski resort special use permit on the Ashley National Forest. If a downhill ski area is approved, a plan amendment may be considered if necessary for the management of the ski area.

7. During site-specific NEPA project analysis, effects and mitigations measures are analyzed and developed for project activities, including effects to soil and water and wildlife. The forest plan includes desired conditions, standards, guidelines, and objectives that would guide projects and assist in identifying mitigations measures for all resources.

8. The forest plan is primarily intended to 92ithin92 Forest Service personnel in identification, analysis, and implementation of projects and activities on National Forest System lands. Area-specific restrictions may be identified as appropriate in specific management actions. The revised forest plan includes numerous desired conditions, objectives, and guidelines relating to healthy and resilient watersheds, aquatic plants and wildlife, and groundwater-dependent ecosystems. The revised forest plan also includes the identification of riparian management zones and associated plan components. These zones provide critical transition zones linking terrestrial and aquatic ecosystems and include desired conditions and guidelines. Furthermore, past Forest Service NEPA analysis for projects and plans that are still in place have identified multiple project constraints to protect water quality. These include the travel management plan for the Ashley National Forest (Forest Service 2009), which has a 300-foot minimum distance from a stream, wetland, or other body of water for motorized travel for the purposes of dispersed camping, unless it is signed as exempt (this does not include reservoirs). The High Uintas Wilderness management plan (Forest Service 1997) also includes limits on camping locations 92ithin 200 feet of high-elevation lakes and rivers in the High Uintas Wilderness.

9. Objectives and other plan direction in the Recreation Management Area section of the plan are designed to move toward the desired conditions in the other forest wide recreation sections.

10. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. When new motorized or nonmotorized trails are proposed and accepted, the project will be analyzed in a project-specific NEPA analysis to identify the effects to forest resources. The forest plan includes objectives for developing, changing width designations, and improving motorized and nonmotorized trails,

11. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. For new motorized trails or changes to current classification, the Forest would conduct a project-specific NEPA analysis to identify the effects to resources of adopting specific routes as Forest Service System trails. The plan includes an objective in the General Recreation Areas section to change the classification of 10 miles of 50” or less trails to 60” or less trails within 5 years of plan approval.

12. The forest plan includes objectives for trails, roads, and campgrounds related to improvements and maintenance. Goals in the roads, trails, and facility sections of the forest plan are included to continue and increase cooperation and collaboration in maintaining roads, trails, and facilities through partnerships and volunteers.

13. The Forest Service has recently released information and guidelines related to electric bicycle use. Electric bicycles are considered motorized vehicles on Forest Service lands. This information can be found at www.fs.usda.gov/visit/e-bikes.

14. The language regarding acreages closed for special use permits was removed from the final EIS with the inclusion of Alternative B modified. Special use permits across all alternatives will remain at constant levels or increase moderately based on demand.

15. Although there are 275,175 acres in the High Uintas Wilderness, that is not the only area where visitors seek solitude on the Forest. Not all visitors seeking solitude for specific activities such as hunting, fishing, or backpacking have the ability or equipment to access the High Uintas Wilderness.

Recreation – Backcountry Recreation Management Areas

Letter numbers 25, 120

Issue Statements

1. The Forest Service should state the intent and need of the backcountry recreation management areas designation. Backcountry recreationalists can already backpack in the area.

2. The forest plan should facilitate improved management of backcountry recreation management areas by explicitly restricting motorized travel and avoiding commercial timber harvest within them to help to maintain vital primitive and natural characteristics in these places that are worthy of conservation-oriented management.

Responses

1. The recreation management areas were developed to identify areas to focus road, trail, and recreation facility improvements for the different types of recreational settings and opportunities that occur within these areas. Recreation management area mapping would not include the elimination of any existing Forest Service System roads or trails.

2. Approximately 57 percent of the National Forest System lands on the Ashley National Forest are inventoried roadless areas. The recreation opportunity spectrum includes 20 percent primitive and 26 percent semiprimitive nonmotorized. A majority of the backcountry recreation management areas are inventoried roadless areas that have restrictions on road construction and timber harvest. Suitability for inventoried roadless areas includes plan component DA-SUIT-IRA-01, which states: “Inventoried roadless areas are not suitable for timber production. Timber harvest may be allowed for other resource benefits consistent with the 2001 Roadless Area Conservation Rule.” The suitability component for backcountry recreation management areas (MA-SUIT-RMABACK-01) states: “Backcountry recreation management areas are suitable for wheeled motorized travel consistent within the recreation opportunity settings as assigned and on designated roads, trails, and areas, but motorized trails are a minimal part of the trail network.”

Recreation – Destination Recreation Management Areas

Letter numbers 74, 120

Issue Statement

1. The analysis in chapter 3, page 81, and chapter 3, page 174 (Effects from Livestock Grazing) is incomplete. It only analyzes the impacts from grazing; the Forest Service should acknowledge or consider the impacts from increased recreation use such as trampling of vegetation, eroding of streambanks, and creation of trails by humans and vehicles. The plan should acknowledge and analyze the impacts to destination recreation management areas by all uses. The acreage for

destination management recreation management areas under alternative C is also inaccurate in places.

2. The proposed closure of the destination recreation management areas to grazing under this plan is in violation of Forest Service Handbook 2209.13 chapter 10, 16.6. Areas have been adjudicated and delineated for livestock grazing and except in an emergency a grazing permit cannot be canceled without a two-year notification. Closure of the destination recreation management areas to grazing would require additional project-level NEPA analysis to modify and delineate new allotment boundaries. Some sections of the forest plan state that destination recreation management areas would "exclude" grazing, while other sections use the term "closed." The difference between these terms should be clarified.

3. The Forest Service should include descriptions and analyses of stressors to bighorns and other types of wildlife, especially at-risk species, caused by additional human use of destination recreation management areas. Some of the proposed destination recreation management areas partially overlap with bighorn sheep herd home range; the stressors to the bighorns in such situations would be substantial, and the residual effects of sickness, further dispersion, and other negative elements would be untenable.

Responses

1. Impacts from increased recreation use are analyzed in project-specific NEPA analysis for new or expanded developed recreation facilities, not in the EIS for the forest plan. As part of the NEPA analysis, mitigations for these impacts are identified, such as hardened trails, information and regulation signage, and control devices such as fences or other barriers.

2. The Forest Service developed a range of alternatives based on scoping comments. The removal of grazing within destination recreation management areas as a part of alternative C was in response to scoping comments.

3. For any expansion of existing developed recreation facilities or any new facilities, a NEPA analysis would be completed for the site-specific project. This would include analysis of effects to bighorn sheep. Through the analysis, project constraints and mitigations would be identified to reduce stressors to bighorn sheep and other wildlife. Furthermore, although recreation may potentially cause stress to wildlife, including bighorn sheep, it appears that bighorn sheep may be somewhat tolerant of recreation activities (Papouchis et al. 2001; MacArthur et al. 1982; Longshore et al. 2013; Wiedmann and Bleich 2014; Toweill and Geist 1999), as evidenced, for example, by the consistent use and exhibition of undisturbed behavior of bighorn sheep along Highway 191, Forest Service roads, and campgrounds near Flaming Gorge. Likewise, the Utah Division of Wildlife Resources unit management plan for bighorn sheep in this area (UDWR 2019) indicates that bighorn sheep in the area are not disturbed by recreational activities. The Ashley revised forest plan includes plan components that address recreational and/or human disturbance to wildlife and at-risk species. For example, there are guidelines to protect nesting raptors (including the peregrine falcon), bats, wintering ungulates, migrating ungulates, and U.S. Fish and Wildlife Service birds of conservation concern. See also appendix D of the FEIS and the crosswalks' contained within that document.

Recreation – Dispersed

Letter numbers 114, 128, 135

Issue Statements

1. Currently, there are many places in the Forest where dispersed camping is appropriate and encouraged and has been administratively allowed outside the 150-foot rule. The forest plan should address these dispersed camping areas and should identify areas that support recreation outside the 150-foot rule that are beneficial, sustainable, and ecologically supported as designated areas.

2. The Forest Service should recognize the value that connecting with nature through dispersed camping and recreation brings. Restricting this form of recreation and limiting areas of use will only increase impact. Restricting use to designated sites or to a specific number of sites is arbitrary and could potentially limit the Forest Service from actively managing use. The Forest Service should be able to add in additional resources as needs increase. User conflicts or possible resource damage can often be solved through management solutions. The Forest Service should implement these practices before closure. The Forest Service should adopt dispersed camping standards within this plan to require public input for any dispersed camping closures. Allowing dispersed camping should also be seen as a management tool for offsetting the socioeconomic inequities that are taking root as ultra-wealthy residents displace lower- and middle-income individuals and families from the area of the Ashley National Forest.

3. The Forest Service should support shared use. As long as overall visitation numbers are appropriate for the affected resources, motorized and nonmotorized users can be compatible with one another. Motorized and nonmotorized recreation use often overlap as off-highway vehicles often increase accessibility to nonmotorized recreational activities such as hiking, camping, and equestrian use. To prevent and avoid adverse resource impacts and user conflict, the Forest Service should actively manage the area and routes. Through different management strategies and proper education, negative impacts can be properly mitigated without closures. As the popularity of outdoor recreation grows, the Forest Service should be looking at ways to provide reasonable access that will sustain the growing numbers of visitors. Additional loops and routes for motorized activities should be used to accommodate the increase in use and mitigate negative impacts.

Responses

1. The dispersed camping 150-foot rule in Utah was identified in the 2009 travel management decision (Forest Service 2009). Addressing dispersed camping areas that fall outside of the 150-foot area would require a NEPA analysis for adding additional Forest Service System roads. This would be project specific and outside of the forest plan revision.

2. The Ashley National Forest plan revision does not restrict dispersed camping. Desired conditions are included for dispersed recreation opportunities. Any closure or restriction of specific dispersed recreation opportunities would be site specific and would require a NEPA analysis separate from forest plan revision.

3. There are many places on the Ashley National Forest where motorized and nonmotorized recreational opportunities overlap. The Forest also identifies areas where there are recreational opportunities free from the sights and sounds of motorized use for recreationalists who prefer those settings.

Recreation – Motorized

Letter numbers 2, 6, 13, 68, 76, 113, 123

Issue Statements

1. The Forest Service should consult the following source in evaluating motorized recreation alternatives: Wuerthner, George (ed). 2007. Thrillcraft The Environmental Consequences of Motorized Recreation. Chelsea Green Publishing Company. White River, Vt.; Forest Service Technical Report RWU - 2905 2005 (recognizing there is a lack of evidence that educational programs lead to behavioral changes in motorized users); and USU Institute for Outdoor Recreation and Tourism studies (showing that nearly 40 percent of riders admit going off legal trails on their last ride).

2. The Forest Service should consider the distance motorized sound may travel when considering the reduction or expansion of motorized recreation under the range of alternatives. The Forest Service should consider options to minimize noise propagation and the impacts of noise on wildlife and quiet users. Roads and trails, including illegal user-created routes, should be mapped and sound contours plotted showing the distance and aerial effects on wildlife security areas and "quiet" users. Road noise from vehicle traffic within a U.S. national park was shown to extend over 1.5 km into backcountry areas at some locations, requiring visitors to hike this distance to experience natural sounds (Park et al., 2009). This suggests that management interventions, such as reductions in vehicle speeds, roadway surface treatments, and noise limits for motor vehicles and equipment (such as those recently adopted by the U.S. National Park Service—NPS, 2019) may be options to minimize noise propagation.

   Other research suggests that noise from hikers (e.g., loud talking, cell phones, etc.) can be reduced by 2–3 dB with educational interventions (Manning et al., 2010). The Caribou National Forest Winschell Dugway draft EIS (p. 68) provided an analysis of sound decay with distance, assuming the source sound level of one or two ATVs at 96–99 dBA would decay to 69–72 dBA at 3200 feet from the source, a level still above the Environmental Protection Agency recommended outdoor limit of 55 dBA (p. 78). Noise is a particularly objectionable aspect of snowmobile (over-snow vehicle) use. A Park Service report showed that even "quiet" snowmobiles could be heard more than two miles away, thus affecting a four-mile-wide area adjacent to travel corridors or use areas (U.S. Department of the Interior, National Park Service. Winter Use Plans: Supplemental Draft Environmental Impact Statement. Yellowstone and Grand Teton National Parks and John D. Rockefeller, Jr., Memorial Highway. March 29, 2002).

3. The Forest Service should consider the needs of mobility-impaired users and keep as much of the Forest open for off-road vehicle access as possible so they can enjoy forest resources.

4. The Forest Service should examine plans for motorized access to ensure they all comply with the National Trails Strategy. The Forest Service must consider that choosing an alternative that expands motorized user access to the Forest would provide a signal to the motorized community that its cooperation in reducing impacts and creating a sustainable trail network has been recognized and would provide an incentive for further partnership.

5. Motorized recreation in alternative D should be modified to be consistent with the overall intent of the alternative, more closely match the management in alternative B, and reflect local county and user group plans developed in partnership with the Forest Service. Several locations that alternative D zones as semi-primitive nonmotorized are identified in alternative B as semi-

primitive motorized zones. This type of conflict of site-specific designations is especially important in three of the locations. First, the Daggett County Trails Master Plan has identified Sol's Canyon for expanding off-highway vehicle trails to connect the town of Manila with the Ashley National Forest, and only alternative B would zone it as semi-primitive motorized (with all the other alternatives zoning it as semi-primitive nonmotorized). Second, the Daggett County Trails Master Plan has identified Dutch John Mountain for expanding off-highway vehicle trails, and only alternative B would zone it as semi-primitive motorized (with all the other alternatives zoning it as semi-primitive nonmotorized). Third, improving the Badlands off-highway vehicle trail system depends on expanding off-highway vehicle trails in Road Hollow and Alkali Canyon, and only alternative B would zone it as semi-primitive motorized (with all the other alternatives zoning it as semi-primitive nonmotorized).

Additional plans come from other community-based efforts like the Uintah County OHV Master Plan and Badlands Trail Committee and were developed in partnership with the Forest Service. The direction of these plans should be accurately reflected in the forest plan. To coordinate with the 2019 Daggett County Trails Master Plan, the following zone designations from alternative D should be included in all alternatives, including the final alternative chosen: zone the Green's Draw area as semi-primitive motorized, which the 2019 Daggett County Trails Master Plan has identified as critical to building an off-highway vehicle link between the Dutch John area and the rest of Daggett County with Uintah County; zone Dry Gulch Creek Road to Heller Lake as semi-primitive motorized, which the 2019 Duchesne County Trails Master Plan selected as a concept to connect motorized singletrack across the south slope of the Uintas (the Dry Gulch Irrigation Company also requires use of this road for maintaining their water supply); and zone the Galloway Spring area as semi-primitive motorized as it includes existing trails that ought to be considered in travel planning.

6. The forest plan should zone most of the Forest motorized to allow for the managerial flexibility that will be needed to meet off-highway vehicle demand in a sustainable fashion. Aligning these recreation opportunity spectrum designations is critically important as nonmotorized recreation opportunity spectrum zones prevent the consideration of motorized trail additions, while motorized recreation opportunity spectrum zones don't prevent the consideration of nonmotorized trail additions or require the addition of motorized trail additions.

   The draft forest plan's zoning of half the Ashley National Forest as recreation opportunity spectrum classes that prohibit the consideration of motorized recreation is problematic for at least three reasons. First, creative planning solutions in unknown future conditions will be difficult under the proposed rigid zone changes. For example, in the future electric power will likely dominate the vehicle and bicycle markets, making such uses entirely suitable in many of the areas that the draft forest plan proposes to rigidly zone as nonmotorized. The Ashley National Forest needs the flexibility that motorized recreation opportunity spectrum zones provide to deal with that future uncertainty. Second, these areas have not and would not depend on rigid zoning for protection as environmental review of trail development is onerous and will likely become only more onerous over the life of the forest plan. Third, motorized recreation opportunity spectrum zones do not limit the Forest Service's options like nonmotorized ones do; rather, they provide the agency with needed discretion to meet the challenges of all issues.

7. The Ute Indian Tribe does not allow the use of all-terrain vehicles on its reservation. This should be corrected or noted in the following locations in the draft EIS: page 2, line 11; page 96, line 19; and page 289, lines 21–25. The Ashley National Forest and the Forest Service should work with

the Tribe to enforce this rule on Indian Country lands within the Forest regardless of the alternative selected.

8. Trails that link Manila Park and other areas in Uintah County to the trail along SR-44 should be maintained and reopened to all-terrain vehicle and snowmobile use. The Don Hatch trail should be opened to all-terrain vehicle use. The locations of the trails are close enough to SR-44 that this would not cause additional impacts over the highway traffic.

9. To keep up with current trends, all-terrain vehicle trails should be revised to accommodate the wider side-by-side off-highway vehicles.

Responses

1. The Forest Service published the Travel Management Rule (36 CFR part 212) in 2005. The goal of this rule was to identify a transportation system that is environmentally and financially sustainable while meeting public needs. The Ashley National Forest completed a Travel Management analysis in 2009 and has increased visitor education and enforcement regarding motorized travel. The forest plan does not designate or authorize motorized routes. When specific motorized roads or trails are proposed through updates to the Travel Management Plan, the provided resources will be utilized in the analysis of effects of any new routes.

2. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. The forest plan does not identify specific additional motorized routes. When new motorized trails are proposed or over-snow vehicle use is studied, a NEPA analysis to identify the effects to Forest resources is conducted. Soundscape information is included in the analysis to analyze the effects to recreation and wildlife resources from these specific routes. However, because future route locations are not known and because the forest plan does not address winter over-snow vehicle travel management, the suggested information has not been utilized in the revised forest plan.

3. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. The Forest also identifies areas where there are recreational opportunities free from the sights and sounds of motorized use for recreationalists who prefer those settings. Although some areas do not include motorized trails or roads, other areas on the Ashley National Forest offer a similar recreation experience that can be accessed by motorized vehicles.

4. The Forest Service embraces a shared-stewardship approach in providing and managing a sustainable system of both motorized and nonmotorized trails. The Ashley National Forest's proposed management direction includes a goal to increase the roles of communities, partners, and volunteers in planning, developing, and maintaining motorized and nonmotorized trails.

5. The Forest Service reviewed the recreation opportunity spectrum alternative maps in comparison with the county trails master plans. The Ashley National Forest seeks to provide recreational opportunities and settings for both motorized and nonmotorized uses. Alternatives were developed for the forest plan revision to provide a range of recreational opportunities and settings.

6. The Ashley National Forest strives to provide the appropriate level of motorized and nonmotorized recreation opportunity spectrum classifications. The Forest also identifies areas where there are recreational opportunities free from the sights and sounds of motorized use for

recreationalists who prefer those settings. The responsible official will utilize the analysis in the EIS and take into account comments when selecting which alternative or parts of an alternative will be included in the record of decision.

7. A goal plan component was added to the Transportation Infrastructure - Trails section for all alternatives which states, the Forest coordinates with the Ute Indian Tribe to restrict off-highway vehicles crossing the Forest boundary onto Tribal lands. Also in the FEIS it was clarified that off-highway vehicles are prohibited on tribal lands.

8. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. For new motorized trails or changes to current classification, the Forest would conduct a project-specific NEPA analysis to identify the effects to resources of adopting specific routes as Forest Service System trails.

9. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. For new motorized trails or changes to current classification, the Forest would conduct a project-specific NEPA analysis to identify the effects to resources of adopting specific routes as Forest Service System trails. The draft plan includes an objective in the General Recreation Area section to change the classification of 10 miles of 50” or less trails to 60” or less trails within 5 years of plan approval.

Recreation – Nonmotorized

Letter number 58

Issue Statement

1. The Forest Service should create trails that have multiple users such as mountain bikes, motorcycles, hiking, and horses. In the winter many could be utilized as cross-country ski trails and/or snowmobile trails since they are narrow enough to use on single-track trails.

Response

1. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. The plan includes an objective in the General Recreation Management Area section to construct 10 miles of designed use mountain bike trails over the life of the plan, if local user groups or partnerships are identified to conduct annual trail maintenance. Additionally, there is a desired condition in the trails section of the plan that states: “Nonmotorized single-track trails are available for mountain biking, horseback riding, and hiking.

Recreation – Recreation Management Areas

Letter numbers 60, 74, 113, 128

Issue Statements

1. The Forest Service should explain why recreation management area designations are needed and what regulations guide the designations. The Forest Service should also explain how it identified and set the boundaries for backcountry recreation management areas, general recreation management areas, and destination recreation management areas and how backcountry recreation management areas differ from wilderness. Unlike the Wilderness Act, which retained livestock grazing as it predated the wilderness designation, the Ashley National Forest is now utilizing new

designations with less authority but without the same respect and retention for existing livestock grazing allotments and permits. The introduction of recreation management areas appears to be an attempt by the Forest Service to restrict the multiple uses that occur on the Forest without statutorily or administratively designating the area as a national recreation area, wilderness, or inventoried roadless area. Under alternative C, almost all of the destination recreation management areas overlap with livestock grazing allotments, and the management direction is to prohibit livestock grazing (draft EIS, pp. 26, 118–119). The draft EIS even states that there may be a need to close additional acres where cattle cannot be effectively restricted, which would result in additional loss of permitted head months. Any designated areas with existing livestock grazing should be designated as general recreation management areas, which the draft EIS defines as those areas where "dispersed and developed recreation, fuelwood gathering, vegetation management, livestock grazing, electrical transmission infrastructure, communication sites, and oil and gas production may occur."

2. The Forest Service should consider that using the greater acreage of backcountry recreation management areas from alternative C would likely be less costly than actively managed and developed general and destination recreation management areas and would better support the Ashley's distinctive roles and contributions, which are related to recreation, water resources, terrestrial and aquatic ecosystems, and social and economic values and contributions. To preserve the primitive and undeveloped characteristics that are foundational to the Forest's distinctive roles and contributions, there should also be no distinction between summer and winter recreation opportunity spectrum classes in backcountry recreation management areas, and the final revised plan should include a desired condition that states: "The recreation opportunity spectrum classes within backcountry recreation management areas are either primitive or semi-primitive nonmotorized, consistent with the associated recreation opportunity spectrum map in the approved plan."

3. Recreation management area designations and recreation opportunity spectrum designations are generally redundant and sometimes conflict. The forest plan should avoid statements that would make the backcountry recreation management area categorically prohibit motorized recreation, as under alternative B several small parts of the Ashley National Forest would be zoned as backcountry even though they're also zoned semi-primitive motorized in terms of the recreation opportunity spectrum. The introduction to backcountry recreation management areas on page 83 currently states: "The summer recreation opportunity spectrum settings in these areas are semi-primitive nonmotorized and primitive classes to support remote recreation pursuits that require less dependence on development." For consistency and clarity, it should include the word "predominantly" before "semi-primitive."

Responses

1. Every plan must have management areas or geographic areas or both (36 CFR 219.7(d)).The terms "management area" and "geographic area" may be used to describe how plan components apply to specific parcels of National Forest System land, with locations shown on maps. The definitions of geographic area and management area are defined at 36 CFR 219.19. Geographic areas are based on place, while management areas are based on purpose. The recreation management areas were developed to identify areas to focus road, trail, and recreation facility improvements for the different types of recreational settings and opportunities that occur within these areas and to provide settings and opportunities for different types of recreational activities. The recreation management areas were developed utilizing the recreation opportunity spectrum and the recreation specialist's knowledge of the Ashley National Forest with coordination from

the forest plan revision interdisciplinary team. The Forest Service developed a range of alternatives for recreation management areas, which included a restriction on livestock grazing in the destination recreation management areas for alternative C to analyze for effects in the EIS.

2. The forest plan revision process provides a range of alternatives for analysis. As such, there are multiple configuration alternatives for the recreation management areas, including the backcountry recreation management areas. The winter recreation opportunity spectrum classifications will be developed through a separate NEPA process for over-snow vehicle travel management.

3. The recreation management areas were developed to identify areas to focus road, trail, and recreation facility improvements for the different types of recreational settings and opportunities that occur within these areas and to provide settings and opportunities for different types of recreational activities. As stated in suitability plan component (MA-SUIT-RMABACK-01): Backcountry management areas are suitable for wheeled motorized travel consistent within the recreation opportunity settings as assigned and on designated roads, trails, and areas, but motorized trails are a minimal part of the trail network. As suggested by the commenter, the word predominantly was added before semiprimitive nonmotorized for clarification.

Recreation – Recreation Opportunity Spectrum

Letter numbers 69, 74, 101, 113, 114

Issue Statements

1. The Forest Service should consider over-snow vehicle use when developing recreation opportunity spectrum designations and not close current use areas to over-snow vehicle use.

2. The Forest Service should explicitly define recreation trends, show visitation data and recreation management area usage, and discuss development pressures to explain the development of the alternatives. The document must show a balance of backcountry, dispersed, and developed camping and other recreation uses to justify proposed development and show that the plan is accommodating multiple uses.

3. The forest plan should be consistent with local County plans. The Daggett County Trails Master Plan has identified Green's Draw and Dutch John Mountain as critical connecting routes for off-highway vehicle use between Dutch John, Uintah County, and Manila, but alternative B would close Green's Draw to motorized use. Alternative B would also close the Dry Gulch Creek Road to Heller Lake. In the Duchesne County Trails Master Plan, this route was selected as a concept to connect motorized single-track users across the south slope of the Uintas. Dry Gulch Creek Road to Heller Lake is also used by the Dry Gulch Irrigation Company for maintaining their water supply. The alternative B proposal to open up more of Sol's Canyon as roaded natural is in line with the Daggett County Trails Master Plan goals to provide an off-highway vehicle connection between Manila and the Forest.

4. Under alternative B, the Forest Service should reconsider eliminating the highly used motorized area on the west side of Taylor Mountain Road. Closing this area would eliminate the opportunities for many users to experience Ashley Gorge. The area would be nearly impossible to close since there are many existing routes to and from the area and no natural way of separating it from open areas. The Forest Service should also reconsider the proposed change of a large area near Marsh Peak and Lakeshore Basin to primitive under alternative B. That area is used heavily

by snowmobilers; changing that designation would cut off major use in that area. The Forest Service should enact the proposed alternative B change of Road Hollow and Alkali Canyon from semi-primitive nonmotorized to semi-primitive motorized. This would allow more access as part of the Badlands off-highway vehicle trail system.

5. The forest plan should provide for the continuation of hunting, fishing, trapping, and shooting sports as a valid and vital component of the recreation spectrum. The Forest Service should consider public land access needs in forest planning efforts, including close collaboration with State wildlife agencies to create or maintain access points to the national forest that are important for managing wildlife and removing barriers to hunting and angling participation.

6. The Forest Service should open additional off-highway vehicles under alternative D and explore and incorporate additional recreation access from alternative B.

Responses

1. The Ashley National Forest does not currently have winter recreation opportunity spectrum classifications, which are determined through travel management planning, a separate planning process from revising the forest plan. When over-snow vehicle travel management is conducted, the winter recreation opportunity spectrum will be developed and analyzed through a NEPA process.

2. The forest plan revision process provides a range of alternatives for analysis. Alternative B modified provides a balance between all of the recreation opportunity spectrum classifications, while alternative C emphasizes nonmotorized uses and alternative D emphasizes motorized uses. The analysis was based on the available information.

3. The Forest Service used the recreation opportunity spectrum alternative maps in comparison with the county trails master plans. The Ashley National Forest seeks to provide recreational opportunities and settings for both motorized and nonmotorized uses. Alternatives were developed for the forest plan revision to provide a range of recreational opportunities and settings. The area on the west side of the Taylor Mountain Road is within the Ashley Karst National Recreation and Geologic Area. The Dingell Act that designated this area prohibited any construction of new roads, motorized trails, or access routes. The recreation opportunity spectrum classifications in the forest plan are for summer uses only. When the Ashley National Forest conducts motorized over-snow vehicle travel management, winter recreation opportunity spectrum classifications will be developed. Portions of the Badlands off-trail vehicle system do not have a definitive location on the east side of Highway 191. When these locations are identified, a NEPA analysis will be completed to identify the effects to recreation settings and opportunities.

4. The forest plan revision process provides a range of alternatives for analysis. When over-snow vehicle travel management is conducted, separate from the forest plan revision, the winter recreation opportunity spectrum will be developed and analyzed through a separate NEPA process.

5. Access for recreational activities, including hunting, fishing, trapping, and shooting, is conducted through a travel management decision or through site-specific project-level NEPA analysis. The forest plan revision process includes a range of alternatives for the recreation opportunity settings that provide different levels and types of recreational uses.

6. The forest plan revision process provides a range of alternatives for analysis. Alternative B modified provides a balance between all of the recreation opportunity spectrum classifications, while alternative C emphasizes nonmotorized uses and alternative D emphasizes motorized uses.

Recreation – Recreation Special Uses

Letter number 74

Issue Statement

1. In chapter 3 on pages 283, 302, and 305, the draft EIS assumes that there will be no increase in special-use recreation permits but states that demand is increasing for all types of authorizations. The Forest Service should explain how or why there will be no increase in special-use recreation permits despite increasing demand.

Response

1. The statement that there will be no changes in the type and number of recreation special use permits available is an assumption for the analysis. The number and type of recreation may change in the future pending results from a needs assessment and capacity analysis for areas or uses on the Ashley National Forest.

References

Letter number 64

Issue Statement

1. The References section seems to be missing references. The Forest Service should use professional standards when preparing documents, which includes using in-text citations and providing best available science.

Response

1. All the references cited in the final EIS and plan are now listed in these documents' reference lists. These documents are available in the project records for the Ashley National Forest plan revision. The Forest has also prepared a spreadsheet listing references suggested by the public as best available science and identifying whether each was considered in the analysis (and if it was not considered in the analysis, giving the rationale for that decision).

Research Natural Areas

Letter number 118

Issue Statement

1. Particular areas that should be considered for research natural area designation include Audry Lake Drainage, Big Brush Creek drainage, Sims Peak Potholes North, and South Fork Rock Creek Fen. These areas were recommended in a previous comment and should be reevaluated and reconsidered for both research natural area and wilderness designation.

Response

1. The Forest Service used Forest Service Manual 4063 (Research Natural Areas) as a filter to make determinations regarding candidate research natural areas for the forest plan. The filtering process

followed criteria from the Objectives section of the manual (4063.02 – Objectives), with emphasis given to Objective 1, "maintain a wide spectrum of high quality representative areas that represent the major forms of variability"; Objective 3, "protect against human caused environmental disturbances"; and Objective 6, "serve as baseline areas for measuring long-term ecological change." Initial areas of consideration were Gilbert Bench due to its high-elevation alpine features and the South Forth Rock Creek and Sheep Creek fens due to their restricted rich fen qualities that are exceptional on this Forest. The fens did not qualify because of their long history associated with livestock grazing as well as addition of timber harvesting and/or recreational use. The fens were nevertheless recognized for their distinguishing features; therefore, plan components were developed specifically to provide protection against current drivers and stressors (e.g., FW-DC-RAREHAB-01). On the other hand, Gilbert Bench did qualify due to its alpine nature (not represented by existing research natural areas) and exceptional vegetation diversity. The Gilbert Bench proposed research natural area is analyzed under alternative C of the EIS.

Areas proposed by Grand Canyon Trust were considered later using the same filter. Distinguishing features and habitat for Big Brush Creek Gorge, Audry Lake, and Sims Peak Potholes North proposals were similar to existing research natural areas (Ashley Gorge, Shale Creek, and Sims Peak Potholes). They did not add new and exceptional areas or habitats for scientific research. South Fork Rock Creek had been considered earlier. Reevaluation of these areas is unnecessary.

Regarding wilderness area consideration, recommendations of wilderness areas and research natural areas used separate analyses with different sets of criteria. For wilderness recommendations, the Ashley National Forest completed the Region 4 inventory and evaluation process and offered opportunities for public participation. Utilizing this information, the Forest developed a range of alternatives to analyze for effects as recommended wilderness. This process followed land management planning process requirements in Forest Service Manual 1923 and in the 2012 Planning Rule (36 CFR 219.7(c)(2)).

Scenic Byways

Letter number 24

Issue Statements

1. The Forest Service should add the following sentences after the first sentence on page 314 of the draft EIS: "The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at: https://rules.utah.gov/publicat/bulletin/20ll/20110715/34954.htm."

   The Forest Service should modify the Red Cloud Loop Scenic Backway description on page 314 of the draft EIS to read: "This backway can be accessed from Highway 191 in the Vernal area" instead of Highway 131.

Responses

1. The FEIS has been edited to include the information suggested in the comment.

Scenic Resources

Letter numbers 24, 62, 74

Issue Statements

1. The partial retention scenery management category is too high for alternative D in table 3-82 on page 293 of the draft EIS.

2. The Forest Service should modify the following sentences on page 298 of the draft EIS to read: "The Forest Service would annually consider and prioritize easements identified and agreed upon by State and County governments and private landowners for providing access to the national forest." This would provide the Forest Service with more opportunities to plan for changes that affect the visual character compared with alternatives A and C."

3. The following sentence on page 292 of the draft EIS is inaccurate: "Managing for natural-appearing scenery is important to the public." There are certain areas of the forest where natural-appearing scenery is important, but other areas, such as in the current partial retention or modification visual quality objective areas, where modifications of scenery would likely be acceptable to the public.

4. The Forest Service should add the following sentence to page 291 of the draft EIS after the sentence ending in "the Red Cloud Loop Scenic Backway is 36.2 miles in the decision area, and the Sheep Creek Scenic Backway is 11.4 miles in the decision area." The modified sentence should read: "The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at: https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.

Responses

1. Scenic integrity objectives were developed and modified, as appropriate, to provide for the scenic character, which is a component of sustainable recreation in the 2012 Planning Rule, and a range of alternatives was developed for scenic integrity objectives based on resource integration for ecological, social, and economic sustainability and multiple uses (page 10, draft EIS). Alternative D (page 20, draft EIS) describes how scenic integrity objectives were modified, including the amounts of moderate or low scenic integrity objectives in alternative D, following its emphasis on a more developed recreation setting. Environmental consequences on scenic resources for alternative D are located on pages 297–298, draft EIS. Cumulative Environmental Consequences for Scenic Resources also disclose cumulative impacts for alternative D (page 298–299, draft EIS).

2. After reviewing the analysis in the Scenic Resources section, the planning team has modified the sentence to read as follows: "The Forest Service would annually consider and prioritize easements identified and agreed upon by State and County governments and private landowners for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character compared with alternatives A, B, and C."

3. The importance of managing for scenery that appears natural scenery to the public is documented in the Ashley National Forest's scenery report for the assessment (Buerkle 2017), which is referenced in the Scenic Resources Affected Environment section (pages 291–292, draft EIS). Scenic integrity objectives were developed and modified, as appropriate, to provide for scenic character. A range of alternatives was developed for scenic integrity objectives based on resource integration for ecological, social, and economic sustainability and multiple uses (page 10, draft EIS). Some alternatives provide for more natural-appearing scenic character, and some provide for more altered scenic character. The range of alternatives are analyzed in the Environmental Consequences for Scenic Resources section (pages 293–299, draft EIS).

4. The EIS has been edited according to your comment.

Social and Economic Sustainability and Environmental Justice

Letter numbers 24, 62, 74, 90, 114, 123, 125, 135

Issue Statements

1. The Forest Service should acknowledge direct financial impacts from alternative C.

2. The Forest Service should include discussion of impacts by alternative for those with mobility impairment-related disabilities. Specifically, consider whether any route closures or recommended wilderness in the Ashley National Forest management plan would disproportionately harm disabled users' ability to access public lands. Also consider if adjustment to proposed management is needed to mitigate impacts to this group

3. In addition to a recreation alternative, the Forest Service should consider developing an alternative that corrects the disturbing socioeconomic trends that are taking root in the Western communities that call the areas surrounded by the Ashley forest home. At the very least, the Forest Service should resist turning the Ashley National Forest into a restrictively managed nature preserve for the growing number of ultra-wealthy residents that are displacing everyone else across the West. The Forest Service should incorporate the findings from "The Slums of Aspen: Immigrants vs. the Environment in America's Eden" by Lisa Sun-Hee Park and David Pellow and "Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West" by Justin Farrell. Specifically consider how Western communities surrounded by public land are undergoing significant socioeconomic changes.

4. The Forest Service should review the discussion of economic changes under alternative C due to the exclusion of livestock from destination recreation management areas. Specifically, the following components should be examined: (1) the lack of economic ties to the reduction in head months and (2) the statement that "whether the entire pastures would be closed depends on whether the management areas could be managed to restrict cattle."

5. The Forest Service should include additional data to support the tourism and recreation discussion in the socioeconomic section of the EIS, including visitation trends and forecasts and visitation data for types of recreation

6. Chapter 2, page 16 of the draft EIS, in the Social and Economic Contributions section, states that "Alternative A is focused on a commodity-based approach and emphasizes economic output associated with forest resources. The economic importance of recreation is not emphasized, and contributions from ecosystem services are not specifically addressed." This seems inconsistent

with other goals of the plan. On page 10, sustainable recreation was identified as a key focus of this plan. On page 15, recreation management is tied to an assumption of moderate to heavy levels of recreation. It is important for the reader to know what the increase in visitation is and how recreation use has changed. The Forest Service should also provide the change in socioeconomic value to the surrounding community.

7. The Forest Service should address how the shift toward backcountry and nonmotorized recreation may shift the economics of the Forest; economic multipliers are different across different recreation sectors.

8. The Forest Service should review the data and analysis in the socioeconomic section related to wilderness, including the following: (1) the data presented for visitor satisfaction levels in designated wilderness associates with developed services and facilities (p. 185), given that there are no developed services and facilities in wilderness, and (2) statements that "users looking for solitude may have limited opportunities" on p. 206 and statements that "communities valuing solitude and naturalness for cultural uses may have limited options." There are at least 275,175 acres in the High Uintas Wilderness and additional roadless areas.

9. The following input on recommended approaches for economic analysis of livestock grazing should be considered:

   - The analysis on pg. 203 of the draft EIS understates the impact to the beef cattle industry of grazing on the Ashely National Forest, and that analysis should utilize the number of weaned beef calves to determine percent of cattle supported in the region. That number isn't given in the 2017 inventory but can be estimated by taking the number of all cattle and calves and subtracting milk cows and 85 percent of the number of beef cows (an estimate of the number of unweaned beef calves). Using these figures, the Ashley National Forest allotments support about 12 percent of the beef cattle in Daggett, Duchesne, and Uintah Counties.

   - The Forest Service should incorporate Power, T. 2002. Taking stock of public lands grazing—An economic analysis. In Welfare Ranching, The Subsidized Destruction of the American West, Wuerthner, G., and Mattson, M. [eds]. pp. 263–269. Power summarized the importance of Federal lands grazing for each western state. A table with further information is provided to demonstrate the insignificance of the economic impact of permitted grazing.

   - USDA values for grazing permits based on animal unit months permitted (Torell, L.A., Bartlett, E.T., Obermiller, F.W) have not been adjusted down in permitted AUMs to account for today's heavier cattle and calves, which are consuming double the forage the Forest Service allocates per animal unit month. This adjustment in numbers would cut the permitted animal unit months in half, therefore lowering permit values as collateral for loans or for sale. Other factors would include the uncertainty over Forest Service actions that may reduce these animal unit months based on updating stocking rate calculation, allotment or pasture closures, or reductions to address increasing drought and lowered forage production.

   - Torell, L.A., Bartlett, E.T., Obermiller, F.W., The Value of Public Lands Grazing permits and the Grazing Fee Dilemma. College of Agriculture and Home Economics, New Mexico State University.

10. Specific text changes should be made to address discussion of differences between alternatives in terms of impacts from vegetation and wildland fire management in the socioeconomic and environment justice section. Suggested changes included the following:

    - On page 213, edit text to read "Under alternative C, reduced mechanical treatments and reliance on natural processes would reduce short-term impacts from treatment but provide reduced long-term benefits to ecosystems when compared to alternative B."

    - On page 213, text states that "Impacts under alternative C would be similar to those described under alternative B. Due to a reliance on natural processes, short-term impacts from use of prescribed fire would be reduced compared with other action alternatives; however, emissions would occur from use of managed wildland fires." However, under this alternative, the risk of uncharacteristic wildfire and associated health impacts from emissions would be greater than under alternative B due to the restrictions on active vegetation management in alternative C.

    - On page 213, edit text to read "Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with alternative A but to a lesser degree than alternative B due to the restrictions on active vegetation management."

    - On page 204, edit text to read "The lack of quantitative objectives for vegetation treatments under alternative A and the limitations on vegetation treatments under alternative C, however, would limit the ability to achieve forest-wide changes."

    - On page 204, edit text to read "The lack of quantitative objectives for vegetation treatments under alternative A and the limitations on vegetation treatments under alternative C, however, would limit the ability to achieve forest-wide changes."

    - On page 213, edit text to read "This would result in an additional potential for site-specific impacts on the ability to access recreation areas (in terms of time and cost to access)."

    - On page 189, check table reference; the text includes a cross-reference indicating that key tribal resources and relevant habitat types are identified in table 3-53 in the Areas of Tribal Importance section. However, table 3-53 is titled "Minority and Low-Income Populations within the Socioeconomic Plan Area (2018)." Areas of Tribal Importance don't seem to be included in this table.

11. There is a contradiction between text on page 203, which states that "Under all alternatives, grazing on National Forest Service lands will continue to represent only minor contributions to the ability of the traditional use to continue in the area, particularly for cattle grazing" and text on page 247, which states "although typical operators depend only partially on public lands to sustain their livestock, forage sources on Federal lands still represent a critical part of grazing operations." The text on pg. 247 is more accurate and should be carried forward.

12. Text on page 202 stating " Overall, oil and natural gas prices have dropped significantly since much higher levels seen earlier this decade " should be revised to note the recent rebound in prices from historic lows in 2020.

13. The Forest Service should make changes to the recreation experiences matrix (table 3-58 in the draft EIS), including the following specific edits to recognize additional uses: families use destination recreation management areas (see tables 3-61, 3-62, and 3-63), general recreation

management areas, trails with mechanized access, and trails with motorized access. Large groups use trails with mechanized access and trails with motorized access. Hunters use remote areas with low use. Anglers use destination recreation management areas, backcountry recreation management areas, and developed recreation sites. Mountain bikers use destination recreation management areas and backcountry recreation management areas (see tables 3-61, 3-62, and 3-63). Off-highway vehicle users use developed recreation sites and backcountry recreation management areas where there are existing motorized routes (see tables 3-61, 3-62, and 3-63). Cultural and historic site visitors use trails with mechanized access and trails with motorized access to reach these sites. Environmental justice populations also use trails with motorized access.

14. There is inconsistent text related to the number of sawmills on page 197 and page 186 of the draft EIS.

15. The Forest Service should provide information on the location of respondents in the 2008 Beliefs and Values Study (Russell 2008); the differences in responses from those in the 2008 Krannich study may be a result of not being in the proximity to the Ashley National Forest.

16. Updated data and footnotes to tables in the socioeconomic section should be provided as follows:

    - Update with 2020 census data (page 179, table 3-44 and associated text; page 180, table 3-45 and associated text; page 180, table 3-46 and associated text)

    - Update employment data for counties in Utah from agencies such as the Utah Department of Workforce Services (page 181, table 3-47 and associated text; page 182, table 3-49 and associated text)

    - Update average earnings and per capita income data (page 182, table 3-48 and associated text)

    - Update expenditure data, which should be available for federal fiscal year 2021 (page 183, table 3-50 and associated text)

    - Update PILT and SRS data for 2020 and 2021 (page 184, table 3-51 and associated text)

    - Page 184, footnote to table 3-51, edit footnote to read: "*Portion of total PILT attributable to National Forest System acres. Additional payments to the analysis area are made as a result of other Federal landownership (for example, the BLM)."

    - Page 184, update text to indicate that the SRSCS has been authorized again after March 2018

17. The Forest Service should further evaluate and establish desired conditions and related guidelines or objectives for environmental justice in the forest plan and incorporate an adaptive management strategy based on the proposed monitoring program that would incorporate measures to address Forest changes or management activities that impact environmental justice communities. This would help the Forest identify changes to management approaches or develop forest plan amendments to better serve the impacted communities.

18. The Forest Service should include an easily understandable accounting of all costs for the various types of vegetation treatments, including prescribed fire application in inventoried roadless areas and wilderness areas and for commercial logging, fuels reduction, and prescribed burning throughout the Ashley National Forest. The estimated cost per acre should be provided for each

treatment, as well as costs for construction of new temporary roads, reconstruction of existing roads, and road obliteration and/or decommissioning per mile of road.

19. Information provided on the economic dimensions of wilderness should be considered.

Response

1. Project-level NEPA analysis will be required for implementation. Project-level NEPA may analyze financial considerations, as warranted.

2. The Ashley National Forest seeks to provide recreational opportunities for all types of recreation uses, including both motorized and nonmotorized trail opportunities. The Forest also identifies areas where there are recreational opportunities free from the sights and sounds of motorized use for recreationalists who prefer those settings. Although some areas do not include motorized trails or roads, other areas on the Ashley National Forest offer a similar recreation experience that can be accessed by motorized vehicles.

3. The commenter suggested the following books be taken under consideration: The Slums of Aspen: Immigrants vs. the Environment in America's Eden by Lisa Sun-Hee Park and David Pellow and Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West by Justin Farrell. These books document how two specific Western communities, Aspen, Colorado, and Teton County, Wyoming, with neighboring public land has undergone unique socioeconomic changes. Socioeconomic trends in the region surrounding the Ashley National Forest were addressed during the assessment phase of the plan revision. The need for change recognizes the changing demographics of the surrounding communities and the need for sustainable recreation, economic resiliency, and ecosystem services. A current snapshot of the socioeconomics of the surrounding region is presented and discussed in the affected environment of the EIS. The current range of alternatives creates a balance between protection of places and ecosystems and use of and access to the public lands by a variety of user groups.

4. The text related to both (1) and (2) has been edited for clarity. Regarding (1), the economic effects of closing portions of active grazing allotments under alternative C are described in the draft EIS on pages 204, 209, 210 and 219. In summary, assuming the reduction in permits is proportional to the pasture area affected, the total permitted head months is estimated to decrease by 3 percent in the affected pastures, or 0.14 percent across the Forest. This reduction does not result in a meaningful impact on the regional economy, but it would affect individual permittees. Regarding (2), the analysis used the percent of the pasture that would be closed based on GIS data and then applied that percentage to the number of animal unit months in the pasture. The assumption was that livestock within the pasture could be managed so that they would not get into the closed destination recreation management areas identified in alternative C. If livestock cannot be managed to stay out of the closed destination areas (i.e., through herding, natural boundaries, or fencing), the entire pasture may need to be closed. These situations would be determined at the site-specific level during implementation.

5. Socioeconomic trends in the region surrounding the Ashley National Forest and recreational uses and trends were addressed during the assessment phase of the forest plan revision. The need for change recognizes the changing demographics and recreational demands and the need for sustainable recreation. A current snapshot of the recreation opportunities and socioeconomics of the surrounding region and recreation visitor contribution to the local economy is presented and discussed in the affected environment section of the EIS. The EIS has been updated to reflect

national trends in recreation to support expected future forest uses and needs for sustainable recreation.

6. To clarify, alternative A is the current plan, not the revised plan. The revised plan does emphasize sustainable recreation. The text has been updated to clarify this.

7. Forest planning does not change visitation or trends in user groups. The economic contribution is analysis is based on the visitor numbers and types from the most recent round of the National Visitor Use Monitoring survey. The discussion in the draft EIS has been updated to better reflect the social and economic differences in types of recreation visitors. The discussion also has been improved to address broad trends in recreation visitors.

8. The analysis has been updated to better address users' wilderness experiences related to both (1) and (2). Regarding (1), wilderness recreationists utilize developed recreation when entering the High Uintas Wilderness from developed trailheads. The Recreation section of the EIS also addresses this use. Regarding (2), the analysis in the EIS has been changed to better capture impacts to wilderness recreation experiences.

9. The socioeconomic section has been updated to incorporate the 2002 Power reference. The Torell et al. (n.d.) reference was not included in the final EIS as the Forest Service uses head months to permit livestock grazing, not animal unit months. Minor updates to the analysis in the EIS have been incorporated.

10. These edits have been incorporated, as appropriate, to be correct and consistent throughout the document. The edits are intended to better discuss trade-offs between the different vegetation management processes under the different alternatives.

11. These sentences have been adjusted to better reflect the use of National Forest System lands in grazing operations and its contribution to the local economy and traditional landscapes.

12. This sentence has been changed to better reflect fluctuations in oil and gas prices over a longer time horizon.

13. The suggested edits have been incorporated into the EIS, as appropriate. The text has been clarified with the following additional statement: "It is recognized that these user groups are not mutually exclusive and that the indicated uses are not a comprehensive list of all activities and areas utilized by each group. Rather, this table identifies key uses and areas of the Ashley National Forest for which management direction is most likely to impact a particular user group's recreation experience."

14. The inconsistencies have been corrected in the text.

15. This has been added to the final EIS.

16. This data has been updated, as appropriate and to be consistent with data used for modeling in the analysis.

17. The Ashley National Forest has and will follow the directive outlined in Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. This executive order directs all Federal agencies, including the Forest Service, to identify and address, as appropriate, "disproportionately high and adverse human health or

environmental effects of its programs, policies, and activities on minority populations and low-income populations." Therefore, identifying management activities that impact environmental justice communities is part of the existing directives that guide decisions, actions and the planning process. The Ashley National Forest will continue to make environmental justice part of its mission. The final EIS references Executive Order 12898 in the regulatory framework to the Social and Economic section of the plan. Goal FW-SE-GO-01 has also been modified to explicitly include environmental justice communities. A monitoring question (MON-SOCEC-03) will look at the extent that the Ashely National Forest is contributing to social and economic sustainability for local populations of environmental justice concern, including Native American Tribes.

18. Project-level NEPA will be required for implementation. Project-level NEPA may analyze financial considerations, as warranted.

19. The analysis has been updated to incorporate the economic and noneconomic values of wilderness.

Soils

Letter numbers 24, 45, 62, 64, 72, 74, 110, 123, 126, 128

Issue Statements

1. The Forest Service should make the following changes to the soils analysis of the draft EIS:

   - On page 49: "Over the life of the plan, livestock grazing management that results in improvements to land health conditions would maintain the soil condition" should be revised to "Over the life of the plan, livestock grazing management that results in improvements to meeting desired conditions."

   - On page 49: "Impacts from livestock grazing on the forests are usually concentrated in relative microsites, including areas of trailing" should be revised to "Impacts from livestock grazing on soils of the forests and rangelands are usually concentrated in relative microsites, including areas of trailing."

   - On page 51: "Under alternative B, two areas covering 10,300 acres would be managed as wilderness with 230 acres identified as potential wetlands" should be revised to "Under alternative B, two additional areas covering 10,300 acres would be managed as wilderness with 230 acres identified as potential wetlands."

   - On page 53: "This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height exceeds 4 inches" should be revised to "This would implement a 40 percent utilization level and 4 inch stubble height level." Or, "This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height exceeding 4 inches is rare.

   - On page 54: "Similar to alternative A, alternative D would not include specific utilization or stubble height guidelines. Impacts on soils under alternative D would be the same as those described under alternative A" should be revised to "If desired conditions are not met under alternative D, then site-specific adjustments will be made accordingly."

2. The draft EIS assumes that livestock grazing may be the causal factor for deteriorating soils. The analysis should also consider shallow soils, wind-swept ridges, headcuts, and recreation as ecological factors for deteriorating soils.

3. The draft forest plan lacks clear parameters for soils desired conditions and how to achieve them. The plan fails to deal with the critical component of biological soil crust. There are no standards to implement the goals for soils, and the few guidelines do not adequately address the impacts to soils from Forest Service actions. If soils are a resource determinant for other guidelines, such as livestock utilization, the final plan should include more specific parameters and monitoring for soils.

4. The Forest Service should add the following plan components for soils:

   Desired Condition: "Livestock grazing managed under regenerative grazing principles improves soil health."

   Objective: "Collect quantitative data on current soil resource condition, trends, and soil productivity."

   Guideline: "Require design features or mitigation measures to reduce impacts of management actions (compaction, displacement, increased bare soil) on all soils disturbed by the development and production of energy and minerals, timber, infrastructure, transportation, and other species uses where soils are impacted."

5. The Forest Service should explain if and where soil conditions are deteriorating in rangeland areas and why specific utilization and stubble height requirements under alternatives B and C "would better maintain rangeland conditions, including soil condition."

6. The soil analysis should include fire and fuels management impacts on soil quality. It should also include livestock use as a cause of compaction, especially on wet and riparian soils.

7. The Environmental Consequences section for soils should include acreages of impacts from fire and fuels management, designated areas, timber harvest, livestock grazing, and energy and minerals actions. Similarly, the Affected Environment section for soils should include acreages of roads and trails that cover slope ranges.

8. On page 46 of the draft EIS, the soils analysis references burn severity classes. The Forest Service should include descriptions of the three different classes and their estimated extent on the Forest.

9. The Forest Service should take soil stability and degree of slope into consideration when harvesting to maintain soils and water quality and prioritize the use of existing roads whenever possible. The Forest Service should utilize existing roads wherever possible, minimize construction of new roads, and site and design new roads in a manner that reduces erosion and impacts to water quality.

Responses

1. In response to comments, the paragraph in the draft EIS, chapter 3, Soils, on page 49 has been changed to the following:

   Effects from Livestock Grazing Management
   Disturbance to soil resources from livestock grazing is usually concentrated in relative microsites, including areas of trailing, water crossings, water sources, salt blocks, holding corrals, and bedding sites. These sites have impacts of soil displacement, loss of vegetation, and soil compaction. Impacts on soils can also add to surface erosion due to the increase in bare soil and the loss of water infiltration from compaction. Livestock grazing can cause compaction, displacement, and erosion in wetlands, in wet meadows, and along riparian corridors. Impacts in these areas of sensitive soils include trailing, sloughing of stream banks, and the development of mounds where holes are punched through the turf. Over the life of the plan, livestock grazing management that maintains or trends toward desired conditions would maintain the soil condition; however, if an area is overgrazed, the soil condition could decline.

   In response to comments, the paragraph in the draft EIS, chapter 3, Soils, on page 51 has been changed to the following:

   Effects from Designated Areas
   No new designated areas are proposed under alternative B modified and the impacts on soils in designated areas would be the same as those described under alternative A, which corresponds to those described under "Environmental Consequences for Soils Common to all Alternatives".

   In response to comments, the paragraph in the draft EIS, chapter 3, Soils, on page 53 has been changed to the following:

   Effects from Livestock Grazing Management
   Compared with alternative A, alternative C would reduce utilization levels of key forage species. Alternative C would not allow for modifications, unlike alternative B modified, and it would help ensure rangeland desired conditions are maintained. Alternative C would implement a utilization limit of key forage species to no greater than 40 percent of the current year's growth. It also would leave a 4 inch or greater stubble height of palatable herbaceous species between the greenline and bankfull of stream systems. Soil condition would benefit from the plant cover, root support, and litter additions provided by these measures that would increase effective ground cover and soil organic matter.

   In response to comments, the paragraph in the draft EIS, chapter 3, Soils, page 54 has been changed to the following:

   Effects from Livestock Grazing Management
   Alternative D would not include specific utilization or stubble height guidelines; however, alternative D has general guidelines so utilization of key forage species and stubble heights meet desired conditions for soils and terrestrial vegetation. If desired conditions are not met, then management would make site-specific adjustments, and soil conditions would benefit from maintenance of sufficient vegetation cover and litter additions to the surface soil.

   Soil condition does not attempt to summarize conditions over the Forest since they are evaluated on a site-specific basis and are constantly changing due to human-caused factors as well as natural, environmental changes, including wildfires, and drought cycles.

2. Chapter 3, page 50, is addressing the topic of livestock grazing impacts without the use of utilization and stubble height guidelines that can be used to improve rangeland soil conditions. Livestock grazing, utilization levels, and stubble height directly impact soil resources in several ways. The amount of vegetation present and providing cover is key to soil stability and erosion rates, coincides with root support and root exudates into soils, and determines the amount of litter additions to the soil surface. Plant litter provides effective ground cover and maintains soil organic matter, which is important to many soil properties, including soil structure, water-holding capacity, soil microorganisms, and nutrient cycling. The amount of native vegetation present is also a factor in limiting invasive species encroachment. Chapter 3, Affected Environment, describes how other uses and management of the forest impact soils, including timber harvest and recreation impacts. The draft EIS also discusses natural factors that determine how prone soils may be to degradation from erosion and compaction, including slope gradient, topography, climate, soil properties and surface cover.

3. The draft forest plan outlines desired soil conditions within six desired condition statements, FW-DC-SOIL-01 through 06. The desired conditions can be achieved by following the five guideline components for soil resources, (FW-GD-SOIL-01 through 05), monitoring soil conditions, and utilizing best management practices for design features and mitigations at the project level. The guidelines cover the key factors of maintaining effective ground cover and organic additions to the soil surface, guidance for post-project reclamation, and equipment limitations. These guidelines are effective in limiting detrimental soil disturbance, including erosion, and in maintaining soil productivity.

   The table for monitoring soil resources lists indicators used to evaluate soil condition, including effective ground cover, bare soil, encroachment of invasive species, detrimental soil disturbance, erosion, the condition of the surface “O” and “A” horizons, soil structure, mass wasting, and condition of fens, springs and wetlands. The monitoring is in compliance with soil quality indicators used by the Natural Resources Conservation Service and Region 4 soil condition monitoring. In response to comments the soil monitoring table has been edited so this information is more clearly stated.

   It is not required to have standards as components within each resource section. As stated in 36 CFR 219.8(a)(2), the plan must include standards or guidelines. The draft forest plan is in compliance with the Intermountain Region (Region 4) Forest Service Manual 2500 supplement 2500-2-11-1. The Regional Office guidance for soil management provides standards and guidelines that are stated to be examples, whose use is optional, and that could be used at the level of a forest plan or at the level of specific forest projects.

   Biological soil crusts are addressed in FW-DC-SO 03: “Where natural site conditions allow, biological soil crusts are present and maintained to improve nutrient cycling, add organic matter, and stabilize soils, including areas of desert-shrub, rangelands, sagebrush, and alpine ecosystems.”

4. Regenerative grazing requires tight pasture control and rotation that is not feasible in Forest Service allotments. The draft forest plan desired condition for soils, FW-DC-SO-01, discusses the connection between productive vegetation and soil quality, and this concept is repeated in the introduction to soil components: “Soils of high quality are capable of supporting productive native plant communities. Likewise, productive plant communities sustain soils by providing cover, root support, plant litter and coarse woody materials, and the organic matter and root exudates that sustain soil structure, porosity, and microorganisms.”

The suggested objective is not a plan component but is covered in chapter 4 in the plan on monitoring for soils. Quantitative and qualitative soil data is continually collected on the Ashley National Forest using soil pedon descriptions; 1/10-acre macroplots to record plant species, canopy cover, bare soil, and effective ground cover; the Region 4 Soil Condition Evaluation Form; and the forest soil disturbance field guide. In response to comments the soil monitoring table has been edited so the information is more clearly stated.

The forest plan includes soil guideline FS-GD-SOIL-05 that directs the use of design features and mitigations to prevent and reduce detrimental soil disturbance for all activities on the Forest, as follows: "National Core Best Management Practices and Regional Handbook soil and water conservation practices, as well as project-specific design features and mitigations, should be used and developed as needed to protect soils from compaction, displacement, and erosion and to maintain soil productivity."

5. Rangeland conditions, including soil conditions, are monitored on a site-specific basis corresponding to each individual allotment. There are 66 allotments on the Ashley National Forest, and approximately 997,600 acres of the Forest are used for livestock grazing. Range/ecology monitoring studies are maintained and used to monitor allotments, with data including repeat photo monitoring points, line-point intercept transects, frame plots, and 1/10-acre macroplot studies to record vegetation species, canopy cover, surface ground cover composition, and bare soil. There are approximately 22,500 range/ecology study sites spread out across the Forest.

   Specific utilization and stubble height requirements maintain rangeland and soil conditions by using the known thresholds where desired conditions are maintained or will deteriorate, depending on the type of vegetation community and its range of variability. With the potential for changes in weather patterns and increased periods of drought on the Forest, the utilization and stubble height requirements can adjust to a given year's conditions. Livestock grazing, utilization levels, and stubble height directly impact soil resources in several ways. The amount of vegetation present and providing cover is key to soil stability and erosion rates, coincides with root support and root exudates into soils, and determines the amount of litter additions to the soil surface. Plant litter provides effective ground cover and maintains soil organic matter, which is important to many soil properties, including soil structure, water holding capacity, soil microorganisms, and nutrient cycling. The amount of native vegetation present is also a factor in limiting invasive species encroachment.

6. In response to comments, the Soils section in chapter 3 of the draft EIS has been edited and includes a discussion of fire and fuels management.

   The section titled Effects from Livestock Grazing has been edited to add compaction impacts in wetlands and riparian areas, as follows:

   Effects from Livestock Grazing
   Disturbance to soil resources from livestock grazing is usually concentrated in relative microsites, including areas of trailing, water crossings, water sources, salt blocks, holding corrals, and bedding sites. These sites have impacts of soil displacement, loss of vegetation, and soil compaction. Impacts on soils can also add to surface erosion due to the increase in bare soil and the loss of water infiltration from compaction. Livestock grazing can cause compaction, displacement, and erosion in sensitive areas of wetlands, in wet meadows, and along riparian corridors. Impacts in these areas of sensitive soils include trailing, sloughing of stream banks,

> and the development of mounds where holes are punched through the turf. Over the life of the plan, livestock grazing management that maintains or trends toward desired conditions would maintain the soil condition; however, if an area is overgrazed, the soil condition could decline.

A summary table (Table 3-4: Summary of Current Main Impacts on Soil Conditions on the Ashley National Forest) has been added to provide quantitative impacts at the end of chapter 3, Affected Environment and Environmental Factors (Soils).

Impacts from hydrophobicity have been added to the Effects from Wildfire and Prescribed Fire section.

In response to comments, the Effects from Designated Areas section has been rewritten to avoid bias, as follows:

> All alternatives would manage the designated High Uintas Wilderness Area, Ashley Karst National Recreation and Geologic Area, Sheep Creek Canyon Geologic Area, seven research natural areas, 637,700 acres of inventoried roadless areas, and two suitable wild and scenic river segments. Recreation and livestock grazing use is allowed in these areas, but prescribed fire and vegetation management projects are banned in the wilderness and restrictions on new road and temporary roads limit prescribed fire and vegetation management in the national recreation and geologic area, the research natural areas, and inventoried roadless areas. Soil condition in these areas can be expected to depend on the combined impacts of all allowed uses.

7. In response to comments, a summary table (table 3-4: Summary of Current Main Impacts on Soil Conditions on the Ashley National Forest), was added to the Affected Environment and Environmental Consequences section in chapter 3 of the draft EIS for forestwide impacts. It is not feasible to estimate these impacts per alternative. It is not possible to divide the forest road and trail systems into slope classes. Most system roads maintain a slope gradient of less than 10 percent, but steeper sections exist depending on the topography of the area. A single trail can have multiple sections of different slope gradients.

   The plan components for soil resources are the same for alternatives B modified, C, and D with the exception of FW-GL-SO-02, which has higher reclamation standards in alternative C than for alternatives B and D; guideline FW-GL-SO-04 is the most restrictive for equipment use in alternative C and least restrictive in alternative B. Alternatives may be compared in appendix B of the draft EIS in the Comparison of Action Alternative Plan Components.

8. In response to this issue statement, the definition of the three soil burn severity classes has been added to the glossary of the EIS. The soil burn severity classes are used to ground-truth imagery and maps provided by aircraft using remote sensing. It is not possible to tally the acres burned at different soil burn severity classes from all past wildfires on the Ashley National Forest. Not all wildfires are analyzed and mapped for burn severity levels. The technology has been used for approximately the past 10 years on the Forest. Most fires burn with a mix of soil burn severity classes. It is also not possible to predict how many acres per soil burn severity class will burn in future wildfires because of the many factors that determine fire behavior, including type of vegetation, fuel loads, weather, and topography.

9. The draft forest plan includes components under Timber, Transportation Infrastructure, and Soils that provide guidance for road use and construction and for maintaining soil and water quality during timber harvest operations, including reclamation measures, and gradient limitations for

equipment use. These plan components are as follows: Timber: FW-ST-TI-02; FW-GL-TI-01; FW-GL-TI-02; Transportation Infrastructure—Roads and Trails: FW-ST-IN-01; FW-ST-IN-02; FW-GL-IN-02; Soils: FW-GL-SO-02; FW-GL-SO-04; FW-GL-SO-05.

Timber

Letter numbers 24, 58, 62, 77, 90, 101, 111, 121, 128

Issue Statements

1. The forest plan should incorporate larger parameters and flexibility for timber management to promote wildlife habitat enhancement and meet desired vegetation outcomes.

2. The draft EIS does not address the exceptions under the 2001 Roadless Rule for timber harvesting. Timber harvest is allowed in roadless areas to remove small-diameter timber to improve threatened, endangered, proposed, or sensitive species habitat or to maintain or restore the characteristics of ecosystem composition and structure. It is also allowed when it is incidental to a management activity not otherwise prohibited; it is needed and appropriate for personal or administrative use; or the roadless characteristics have been substantially altered due to construction of a classified road and subsequent timber harvest.

3. The Forest Service should note that almost half of the 1,500 acres available for timber production under alternative B would be for individual firewood use and not timber sales.

4. The Forest Service should make the following changes to the timber analysis in the draft EIS:

   - On page 241: “The lack of natural fire over a century has led to timber stands that are increasingly dense with older trees and thus more susceptible to insects and disease. Historical fire suppression has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife.” This should be revised to “The lack of natural fire and the implementation of passive forest management policies over a century has led to timber stands that are increasingly dense with older trees and thus more susceptible to insects and disease. Historical fire suppression and passive forest management has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife.”

   - On page 242: “The combination of fire suppression and insect infestation has also resulted in stand conditions that are potentially more susceptible to high intensity wildfires.” This should be revised to “The combination of fire suppression, passive forest management, and insect infestation has also resulted in stand conditions that are potentially more susceptible to high-intensity wildfires.”

   - On page 245: “When compared with alternative A, alternative B would use modern fire-planning tools to determine high-risk areas, which may offer some protection to timber stands suitable for production and harvest.” This sentence should be revised to remove alternative B and instead refer to alternative C.

   - On page 204, edit the text to read “The lack of quantitative objectives for vegetation treatments under alternative A, and the limitations on vegetation treatments under alternative C, however, would limit the ability to achieve forest-wide changes.”

5. The Ashley National Forest may not be able to sustain management of the suitable timber base with the projected treatments. The plan to use wildfire as a management tool is not feasible due to its impacts on wildlife and the amount of dead and dying timber. The adverse environmental impacts on habitat, soil, and watersheds from fire suppression procedures like back burns are also a concern.

6. When identifying areas as suitable or not suitable for timber production, the forest plan should take into consideration the impact of timber harvesting/thinning on watershed health and water quality. A crosswalk between areas identified as suitable for timber harvest and the guidelines to protect waterbodies, soils, and watersheds (appendix E, forest plan, chapter 2, page 45) would help ensure that adverse impacts to water quality are kept to a minimum while providing for timber harvest necessary to maintain sufficient water yields.

Responses

1. Several plan components support the concept of using timber harvest as a tool to manage the forest vegetation to accomplish multiple resource objectives and to provide wood products to the local economy. Some of these are listed below:

   - FW-DC-TI-01 Lands identified as suitable for timber production support a regularly scheduled timber harvest program that promotes ecosystem health and sustainability.

   - FW-DC-TI-02 Timber production and timber harvests contribute wood products and jobs to the local economy. A sustainable mix of timber products is offered, using a variety of harvest methods and contract types, in response to current and future market demands. This includes making fuelwood and other forest products available to the public through a robust personal-use permitting program.

   - FW-DC-TI-03 Lands suitable for timber production are resilient and resistant to damage caused by natural disturbance—wildfire, insects, and disease—and are less susceptible to economic loss of timber resources.

   There are also management approaches listed in appendix C of the plan that indicate that timber harvesting will be used to move forest vegetation toward desired conditions and to accomplish other multiple use objectives. These management approaches are listed below:

   - Timber Management Approach-01 On lands suitable for timber production, ensure that vegetation management that uses timber tending and harvesting has a primary role in modifying the composition, density, structure, and spatial arrangement of vegetation to achieve desired conditions. Harvesting tools would take precedence over other management tools such as prescribed fire or the use of natural fire.

   - Timber Management Approach-02 Ensure that timber tending and maintenance, such as pre-commercial thinning, contribute to meeting long-term desired vegetation conditions. These conditions include species composition, size classes, and improved forest resilience.

   - Timber Management Approach-03 On lands not suitable for timber production, use vegetation management that includes irregular or unscheduled timber harvests to help achieve the desired conditions when timber harvesting is consistent with other resource objectives. Purposes for harvests may include salvaging dead and dying trees, reducing hazardous fuels, maintaining or enhancing wildlife habitat, and enhancing public safety. The projected timber sale quantities

(PTSQ) and projected wood sale quantities (PTWQ), identified in FW-OB-TI-01 and FW-OB-TI-02, respectively, are not limits on harvesting. They are projections based on historic levels of harvest, industrial capacity, and economic limitations. These projections carry over to the number of acres that can be treated, as provided in FW-OB-FVC-01.

The limitation on the harvested volume is controlled by the sustained yield limit (SYL) provided in FW-ST-TI-07. This limit is 21,446 hundred cubic feet (CCF) per year; salvage volume is not included in this limit. The SYL is substantially higher than the projected timber sale quantities and projected wood sale quantities. The actual harvest volumes and acres treated via timber harvest could increase with increases in industrial capacity and greater cost effectiveness.

2. Inventoried roadless areas are not included as areas suited for timber production, but timber harvest is not precluded in these areas. Harvest could occur in these areas if one or more of the exceptions provided by the Roadless Rule can be met. See the management approach listed below:

   Timber Management Approach-03 On lands not suitable for timber production, vegetation management that includes irregular or unscheduled timber harvests has a role in achieving the desired conditions when timber harvesting is consistent with other resource objectives. Purposes for harvests may include salvaging dead and dying trees, reducing hazardous fuels, maintaining or enhancing wildlife habitat, and enhancing public safety.

3. Historically personal use fuelwood harvest has accounted for roughly half the wood volume removed from the Forest. This trend is expected to continue into the future, and the projected volume (5,204 CCF per year for both Decade 1 and Decade 2) is given in attachment C (now appendix D) of the plan. This volume is expected to be comprised entirely of salvage volume. Salvage volume is not included in the projected timber sale quantity (PTSQ) or the projected wood sale quantity (PWSQ). The harvesting of fuelwood under a personal use permit was not included in the projected 1,500 acres of vegetation treatment a year in the first decade associated with alternative B.

4. When the accumulation of biomass and increases in the number of trees through ingrowth and accretion exceed what is being removed through natural processes and management actions, forested areas become more susceptible to bark beetle outbreaks and high-intensity wildfires. Bark beetle outbreaks and periods of increased wildfire activities have historically been cyclic. Often these events are correlated with certain weather patterns. It is difficult to quantify the contributions of past and present forest management activities to possible recent increases in bark beetle outbreaks and high-intensity wildfires. Some of these recent increases could just be due to the cyclic nature of these events.

   "Passive forest management" is a subjective term without a precise definition. This term seems to imply an intent to limit forest management activities that could possibly reduce the undesirable effects of bark beetle outbreaks and undesirable wildfires. It fails to recognize other factors, such as physical constraints, regulatory restrictions, competing uses, and economic constraints, impacting the level of forest management activities. Therefore, "passive forest management" has not been included in the list of causal agents of bark beetle outbreaks and high-intensity wildfires as requested.

   "Passive vegetation management" is a term used in the draft EIS. Passive vegetation management allows for natural forest succession and relies primarily on natural processes, such as wildfire, for

changes to vegetation structure. It is used most often in association with alternative C in the draft EIS.

The edit request related to page 204 in the draft EIS is related to climate regulation and carbon stocks. The requested edit has not been made. Vegetation treatment objectives under alternative C put a greater emphasis on natural processes to achieve forestwide changes to carbon stocks. See the analysis in the Carbon Storage and Sequestration section for comparison of short- and long-term effects to carbon stocks among the different alternatives.

The typo noted on p. 245 has been corrected in the final EIS.

5. Timber management approach 01 states, "On lands suitable for timber production, vegetation management that uses timber tending and harvesting has a primary role in modifying the composition, density, structure, and spatial arrangement of vegetation to achieve desired conditions. Harvesting tools would take precedence over other management tools such as prescribed fire or the use of natural fire." This management approach emphasizes that timber harvesting as a forest management tool is prioritized over other management tools on lands suited for timber production. It would take precedence over other options, such as prescribed fire or the use of natural fires. Clarifying edits have been made to this management approach to emphasize the priority of timber tending and harvesting on lands suitable for timber production.

6. Timber harvests will be completed to move vegetation toward desired conditions, but they will not be completed specifically to increase water yield.

   A crosswalk identifying plan components to be considered when designing timber harvest projects would be helpful. A crosswalk could be developed following adoption of the forest plan to assist in implementation of the plan without being incorporated into the plan.

   Timber harvest projects on the Ashley National Forest currently make use of existing roads and skid trails and minimize construction of any new temporary roads and skid trails to complete projects. Temporary roads and skid trails are planned and constructed to avoid riparian areas, springs, and drainages in order to protect soil resources and water quality. Slope gradient and soil stability are factors considered in planning for timber projects.

   Plan components for soils include direction to protect watersheds and soils and reduce potential erosion. Soil guidelines FW-GL-SO-02, FW-GL-SO-04, and FW-GL-SO-05 outline reclamation measures for landings, temporary roads, and skid trails after project completion; provide slope gradient limitations for the use of equipment; and support the use of design features and mitigations at the project level to prevent detrimental soil disturbance, including erosion.

   Several plan components for timber resources provide direction that protects soil and watershed resources, as follows:

   > FW-ST-TI-02: Timber shall not be harvested where soil, slope, or watershed conditions would be irreversibly damaged.
   >
   > FW-GL-TI-01: Timber should be harvested only where protection is provided for streams, streambanks, shorelines, lakes, wetlands, and other waterbodies.

FW-GL-TI-02 Timber should be harvested consistent with the protection of soil, watershed, fish, wildlife, recreation and scenic resources.

Transportation and Facilities Infrastructure

Letter numbers 24, 114, 123

Issue Statement

1. The Forest Service should find other ways to mitigate impacts besides temporary or permanent road closures. The Forest Service should also acknowledge that categorical exclusions that apply for construction of new roads should be applicable to these classes and that recreation opportunity spectrum designations should apply only to recreation use.

2. Road density and status should be mapped and the density per square mile determined and be used to determine any additional closures necessary to provide security areas for wildlife.

3. The Forest Service should acknowledge that roads providing access between tribal lands and the Forest are in very poor condition and that the Forest Service supports efforts to obtain Federal Land Access Program grants or other funding to improve these access routes.

4. The sentence on page 269 that reads "Alternatives are currently being explored for the Old Stockmore Ranger Station, which is located on land not connected to the national forest" should be updated as this facility will be conveyed to the General Accounting Office, which will then convey it to the Ute Indian Tribe.

5. The Forest Service should update the following sentences on page 274 of the draft EIS to read as follows:

   "Roughly 11 miles of the route will be in the South Unit of the Duchesne-Roosevelt Ranger District."

   "The Round Park Hardened Stream Crossing Project would provide hardened ford structures at two stream crossings in the Round Park area."

Response

1. Travel management decisions are not part of forest plan revision. Guideline FW-GD-VEGTER-03 addresses the concern about the spread of noxious weeds when constructing or resurfacing existing roads: "Ground disturbances in and next to plant communities that are susceptible to or are affected by invasive plants should be seeded within 1 year following disturbance. Plants that have proven capability to compete with invasive plants should be used."

2. There are many areas on the Ashley National Forest that provide security for big game, and many areas that are 0.5 mile away from roads and motorized trails, especially in the High Uintas Wilderness area. Trails, particularly foot trails, do not affect wildlife the same as motorized trails or roads. Additionally, wildlife responses to roads are not exhibited the same among species but rather are varied in their responses depending upon the species. Some species may be affected by roads, and some may not be affected at all. The desired conditions and standards and guidelines in the forest plan will maintain habitat for wildlife, including at-risk species, throughout the Ashley National Forest. As such, habitat within any migration corridor as well as summer and winter habitats will be maintained and thus will provide the needed habitat connectivity for wildlife

species, including during migration events. Attachment E (now appendix D) of the forest plan provides a crosswalk of Forest plan components that will maintain wildlife habitats on the Ashley National Forest. An analysis of motorized roads, road density, and the potential effects on wildlife on the Forest was completed for the Forest Travel Management Plan. Additionally, the lynx migration corridor referred to in the comment is speculative and is irrelevant as a population of lynx does not occur on the Ashley National Forest. Regardless, the plan components provide habitat for lynx prey species, which will enable a lynx to procure food and move across the landscape should one temporarily disperse on to the Ashley NF.

3. The Forest Service acknowledges that several roads leading to the Forest across other jurisdictions are in poor condition. The Forest Service will continue to pursue alternate funding sources such as the Federal Land Access Program (FLAP) to help reconstruct and/or maintain these roads. The Ashley National Forest currently has two FLAP projects in construction: Taylor Mountain Road and the Sheep Creek Geologic Loop Road. The Ashley National Forest has also submitted FLAP proposals for tribal roads, but these proposals were not selected.

4. This statement accurately reflects the current situation and further details are outside the scope of the forest plan. If an approach regarding the Stockmore Ranger Station is finalized prior to the release of the final EIS, the Forest Service will consider updating this statement.

5. The sentences on page 274 of the draft EIS have been updated to read: “Roughly 11 miles of the route will be in the South Unit of the Duchesne-Roosevelt Ranger District” and “The Round Park Hardened Stream Crossing Project Provided hardened ford structures at two stream crossings in Round Park.”

Transportation and Facilities Infrastructure – Facilities

letter number 8

Issue Statement

1. The Forest Service should implement a more consistent trash pickup.

Response

1. The Ashley National Forest maintains a garbage pickup for its campgrounds. Our employees try to keep all of our facilities clean. This is not a plan revision-level decision.

Transportation and Facilities Infrastructure – Roads

Letter numbers 113, 123

Issue Statements

1. The Ashley National Forest plan revision should identify how road decommissioning will be accomplished and provide a monitoring and enforcement plan. The Forest Service should also work to monitor, control, and prevent the spreading of noxious weeds when constructing temporary roads or resurfacing existing roads.

2. The EIS should include a plan for temporary project route closures as well as additional route closure throughout the Ashley National Forest as mitigation for the cumulative effects of logging, vegetation treatment, grazing, and all-terrain vehicles/off-highway vehicles/over-snow vehicle use in the region and to create and protect wildlife security areas in the Ashley National Forest.

3. Management tools to protect wildlife as described in alternative D should be included across all alternatives.

4. The Forest Service should incorporate scientific literature for the effects of motorized routes on ecosystem processes such as increased erosion, habitat destruction, soil and water pollution, noise pollution, exotic invasions, and wildlife disturbance, elimination, and dispersion

Responses

1. This is a travel management decision that is not part of the forest plan revision. Guideline FW-GL-TV-03 states: Ground disturbances in and next to plant communities that are susceptible to or are affected by invasive plants should be seeded within 1 year following disturbance. Plants that have proven capability to compete with invasive plants should be used."

2. The forest plan is strategic in nature and does not include project and activity decisions, which are made later and only after more detailed analysis and further public involvement. Closing roads and mitigations for future cumulative effects from grazing, logging, vegetation treatment, off-highway vehicle use in the region is outside the scope of the forest plan revision. An analysis of motorized roads, road density, and the potential affects to wildlife on the Forest was completed for the Forest's Travel Management Plan. Desired conditions and standards and guidelines in the plan will maintain habitat for wildlife, including at-risk species, throughout the Ashley National Forest. Habitat within any migration corridor as well as summer and winter habitats will be maintained and thus will provide the needed habitat connectivity for wildlife species, including during migration events. Attachment E (now appendix E) of the forest plan provides a crosswalk of Forest plan components that will maintain wildlife habitats on the Ashley National Forest.

3. It is noted that the commenter prefers alternative D. The EIS provides a range of alternatives to evaluate a range of issues that are addressed in different ways. If all alternatives were the same as alternative D, then there would only be one alternative. If so, there would not be the required adequate range of alternatives. The literature referenced by the commenter was reviewed, but the literature did not contain any new information than what was already considered in the development of plan components for the proposed plan.

4. The Ashley National Forest acknowledges that roads have effects on resources but also acknowledges that there is a need for roads as the Forest Service is a multiple-use agency. Therefore, the forest plan provides desired conditions for the various resources on the Ashley National Forest to ensure their maintenance. Regarding the wildlife resources, attachment E (now appendix E) of the forest plan provides a crosswalk of plan components that will maintain wildlife habitats on the Ashley National Forest.

Unit Capability – Funding

Letter numbers 64, 126

Issue Statement

1. The Forest Service should provide the necessary staff and funding to complete the NEPA process and to implement the management identified in the forest plan. Additionally, the forest plan should include a statement of the Forest's budgetary capability.

Response

1. As required by the 2012 planning rule (36 CFR 219.1(g)), the responsible official must ensure that plan components are within the fiscal capability of the planning unit. Fiscal capability was considered in developing the objectives and monitoring requirements, based on reasonably foreseeable budgets. Forest budgets may fluctuate over the life of the forest plan but are not dictated by the forest plan or alternatives. Forest budgets are distributed by an act of Congress; therefore, no variation across alternatives is modeled. As stated in chapter 1 of the plan: "An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives should be based on reasonably foreseeable budgets. Objectives are intended to be reached over the life of this forest plan, considered to be the first 15 years of its implementation, unless otherwise specified." Plan objectives, goals, and other plan content also promote partnerships and other opportunities to increase capacity for plan implementation and monitoring through shared stewardship, as recommended by the National Advisory Committee for Implementation of the National Forest System Land Management Planning Rule (2018). Areas of the plan that focus on shared stewardship and use of partnerships to achieve objectives include fires and fuels management (FW-GO-FIRE-02 and 03, FW-DC-HVRA-01, FW-OB-HVRA-01, FW-GO-HVRA-01 and 02) and recreation (FW-GO-RECDEV-01, FW-GO-TRAIL-01).

Unit Capability – Volunteers

Letter number 113

Issue Statement

1. The Forest Service should work with motorized recreation groups to coordinate volunteer work, such as motorized route maintenance and off-highway vehicle management.

Response

1. The forest plan has many plan components that direct the Forest Service staff to work with communities, partners, and volunteer groups on projects and on maintenance across many different resources, including motorized and nonmotorized trails.

Vegetation

Letter numbers 52, 72, 64, 74, 123, 126, 128

Issue Statements

1. The role of wildfire, grazing, and browsing on conifer encroachment into vegetation communities should be more thoroughly analyzed by habitat and the differences should be discussed between vegetation communities (e.g., riparian vs. meadow wetlands vs. aspen) and the newest science should be cited. In particular, the plan should explain why livestock grazing is expected to "minimally affect seral aspen communities" with a discussion of current conditions from microplot assessments. Overall, there needs to be more analysis by the Forest Service of the effects of grazing on forest health and the adverse consequences to fuels, fire cycles, fire intensity, insect infestations, infiltration, and nutrient cycling in any NEPA process for the Ashley National Forest plan revision as well as in any other subsequently proposed grazing, resource extraction, or timber projects on the Ashley National Forest.

2. In the table in chapter 2, page 23, titled Annual Vegetation Treatment: Alternative C, "No comparable plan components" should read "Same as alternative A."

3. The analysis of the effects of grazing on terrestrial vegetation under alternative D appears to be flawed and biased. The plan should convey how each permit and allotment has annual monitoring, allotment management plans, and annual operating instruction meetings and plans, all of which guide livestock grazing to meet desired conditions. Additionally, impacts to livestock grazing from annual vegetation treatments should be discussed.

4. The Forest Service should replace Engelmann spruce with lodgepole pine in the following sentence: "Together, these coniferous vegetation types cover about 53 percent of Ashley National Forest lands, with mixed conifer and Engelmann spruce" because table 3-14 indicates more acreage of lodgepole pine than Engelmann spruce.

5. The Forest Service should review and embrace current research on restoring ecosystems using the ever-increasing availability of native plant materials to improve not only resistance to invasion but also to restore ecosystem resilience as well as the tremendous array of ecosystem services provided by the landscapes managed by the Forest Service. Beyond using native plant materials that are currently available, the Forest should also become a source for increasing demand for the development and production of a greater number of species of native plant materials that are more than native by scientific name. The Forest Service should actively manage landscapes to control and reduce noxious weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach), particularly in recreation management areas. Furthermore, the Forest Service should ensure that the discussion in the EIS related to sustainable ecosystems acknowledges the importance of maintaining native plant species. The Forest Service should explain why land health standards are referenced for some alternatives instead of moving towards desired conditions related to livestock grazing.

6. The Forest Service should specify the treatments that would be used to accomplish the following objective (FW-OB-NFV-01): "Restore ecological function, integrity, and resilience; move toward upward trend; or maintain desired condition of 2,500 acres (on average) annually of non-forest vegetation during the life of the plan. This would apply to non-forest areas threatened by conifer encroachment or invasive plants or that are in degraded condition."

7. Ecological sites need to be used to calculate the percentage of potential for total ground cover. These sites need to be refined as well since the Natural Resources Conservation Service ecological site descriptions are on a general scale and soil can vary within a short distance. The Forest Service should reword to reflect the ecological sites, not use a strict 85 percent.

8. FW-DC-NFDS-01 should address biological soil crust rather than managing for bare soil, and FW-DC-NFV-01 should define what "move towards upward trend" means.

9. The following language should be added to the rare and unique habitat types section for calcareous or rich fens, peatlands or fens found in glacial canyons, and peatland or fen with limestone influence: "However, because of the rarity of these ecosystems, and because of how little we understand about the potential effects of climate change on these unique areas, the Forest will continue to monitor these areas very closely. Management activities will be avoided in these areas."

10. The plan should clarify that livestock grazing is not a significant stressor on sagebrush. The volume of data and research regarding sage grouse and sagebrush habitat do not identify livestock grazing as a stressor. Instead, overgrazing by wild horses, ungulates, or livestock may be a stressor to sagebrush habitat. Drought is most commonly the direct cause of stress on sagebrush communities. Moreover, the draft EIS overstates the potential for some livestock grazing to place stress on sagebrush communities because cattle will only eat sagebrush when there is nothing else to eat.

11. The discussion in alternative D should address noxious weeds.

12. The draft EIS is lacking analysis of the potential effects of each alternative on threatened and endangered and species of conservation concern plants.

13. The following guideline is too prescriptive and should not apply across the Forest: "To help support sprouting and sprout survival sufficient to perpetuate the long-term viability and resilience of aspen clones, livestock utilization of key forage species should be limited to no greater than 50 percent of current year's growth, except where long-term monitoring and research demonstrates that a different allowable use level is appropriate." Project-level NEPA analysis should determine the appropriate vegetation objectives and management practices to achieve those objectives. Additionally, the plan provides no rationale to support a 50 percent use limit.

14. The forest plan should include discussion of the Forest Service's native plant materials policy (Forest Service Manual 2070), Native Plant Materials Policy: A Strategic Framework (Forest Service 2012), and the Interagency National Seed Strategy

15. The forest plan states that desired conditions, standards, and guidelines for terrestrial vegetation are to be applied at the forestwide scale unless otherwise specified. This dilution to the 'forestwide' scale renders all these plan components meaningless. Additionally, the plan does not provide standards for nonnative species, and there is no examination of what "nonnative" species are include in terrestrial vegetation guideline 02.

Responses

1. The draft EIS consists of summaries of the in-depth analyses prepared during the forest plan assessment. Summarized analyses regarding conifer encroachment into affected non-forest vegetation communities are found throughout the draft EIS. In many instances, the absence of expected fire intervals has led to departure from the natural range of variation, resulting in an increase of conifers encroaching into and trending to displace non-forest vegetation. These trends have been documented concurrent with and in the absence of livestock grazing. At higher elevations, conifer encroachment is documented at timberline and within subalpine meadows, with and without livestock grazing as a stressor. Changes in climate and other unidentified drivers and stressors are likely factors.

   In regard to seral aspen, most communities are classified as transitional range for livestock. Since seral aspen is subordinate to conifers, minimal grazing occurs within most of these forest types due to minimal forage production. Persistent aspen, on the other hand, is an important community for livestock grazing. In conclusion, livestock grazing, fuel loading, fire, insect infestation, nutrient cycling, and other conditions, stressors, and drivers were analyzed during the assessment. For full analyses of these conditions and trends, refer to documents prepared during the forest plan assessment (Huber et al. 2017). Conclusions of these analyses are based on hundreds of permanent study points referenced from approximately 22,500 studies located throughout the

Ashley National Forest, and from reputable sources and datasets. The review of literature pertaining to aspen (Carter 2012) did not alter forest plan assessment conclusions, nor did it contain additional analyses, conditions, or trends applicable to aspen condition and trend on Ashley National Forest that forestwide, long-term monitoring provided. Site-specific data, along with other cited sources, are considered best available science.

2. Since there are no components to compare with any of the other alternatives, the statement is correct and the edit has been made.

3. Chapter 2 of the draft EIS highlights and analyzes the differences between the alternatives. In the case of livestock grazing, livestock forage utilization and stubble height guidelines, permitted head months, and permitted grazing acres have different values by alternative; therefore, an analysis is warranted. In regard to annual monitoring, allotment management plans and annual operating instruction meetings and plans, these administrative actions are common across all alternatives, not just alternative D; therefore, no comparison of alternative analysis is required. Vegetation treatments associated with livestock grazing are included in the draft EIS discussion, and additional analysis from the forest plan assessment has been included in the final EIS.

4. Mixed conifer and Engelmann spruce are grouped together in the subalpine habitat type and are later addressed together in the analysis. These two vegetation types are grouped in this paragraph anticipating their grouping in the analysis. However, to reduce confusion in this paragraph, the sentence has been modified.

5. Plan components regarding the appropriate use of plant materials to improve, restore, and/or maintain ecological integrity, resilience, and sustainability are consistent with direction given in the Forest Service native plant materials policy. The use of nonnative plant materials with moderate to high resource values and proven capability to compete with invasive plants that do not invade and displace neighboring resilient native communities may be considered for restoration purposes where native vegetation communities are unlikely to establish through natural regeneration or seeding of native plant materials (Forest Service 2012). On the Ashley National Forest, degraded conditions are usually associated with the presence and abundance of invasive plants such as cheatgrass and halogeton. Plan components FW-GO-VEGTER-03 and 04 were designed to support and enhance native plant material research and production. Plan components applicable to all the alternatives support an integrated approach to reduce the establishment, suppress the spread, and minimize the impacts of noxious weeds, including FW-DC-VEGTER-08, FW-GD-VEGTER-03 and 04, and FW-GO-VEGTER-01 and 02. Finally, the Forest Service does recognize the importance of native plant communities and has developed appropriate plan components designed to maintain or restore them within the plan unit. Related plan components include FW-DC-VERTER-01 through 05, FW-GD-VEGTER-01, and FW-GO-VEGTER-01.

   The review of the suggested literature pertaining to native plant materials use (Monsen et al. 2004; Dorner 2002; Hufford and Mealor 2014; Johnson et al. 2010) did not warrant additional plan components or modification of the plan components cited above. These components adequately encompass the directions and guidelines recommended in the cited publications.

   The 2012 forest plan regulations delineate plan components to be used to maintain or initiate a trend towards ecological health, integrity, and sustainability, and these include desired conditions, guidelines, standards, objectives, and goals. The Bureau of Land Management commonly uses “land health standards” as a means to accomplish similar goals. The use of “land health

standards" in the draft EIS is inappropriate. Corrections have been made to delete this term and to refer to desired conditions as the appropriate comparison throughout the analysis.

6. There are numerous types of treatments that can be considered during restoration action, but treatments are not specified within the objective (FW-OB-VEGNF-01) for a couple of reasons. First, the forest plan is a programmatic document that provides long-term direction with parameters for the Forest. Restoration and other management actions are typically site specific and occur at the project level. Spatial, temporal, and design considerations occur during project-level analysis. Second, the full gamut of restoration treatment types that currently exist cannot completely nor reasonably be listed within the objective. Furthermore, new desirable treatment methods may be developed over the life of the new plan.

7. Potential ground cover for vegetation communities on the Ashley National Forest is not determined using ecological site descriptions but is derived from baseline data taken at reference sites that is also supported by related publications. With this data, Goodrich (2021) summarized potential ground cover for major vegetation communities on the Ashley National Forest, which is considered best available science. Eighty-five percent of potential for ground cover is not considered restrictive or an implied standard but is a threshold or benchmark for helping determine resource desired condition. It accommodates reasonable management impacts while conserving soil resources. This component of desired condition has been used for nearly 30 years and is strongly supported by long-term monitoring on the Ashley National Forest.

8. Language has been added to include biological soil crusts in the desired condition description for desert shrub communities (FW-DC-SHRUB-01). Also, the language in FW-OB-VEGNF-01 was edited to improve the clarity of the statement.

9. The forest plan monitoring program contains monitoring questions and indicators that address the physical and biological elements of the ecosystem, including rare calcareous fens and peatlands. The monitoring question and indicators specific to rare and unique habitats is MON-WATER-03. The desired condition description (FW-DC-RAREHAB-01) for these communities provides the direction of habitat components to monitor: "development and accumulation of peat. The size of fens or peatlands remains constant, and organic soils retain current depth, quality, and uniformity." Stressors and drivers that impact or might impact calcareous fens and peatlands, including climate change processes, would be the focus of long-term monitoring. Additionally, plan component FW-ST-RAREHAB-01 curtails or mitigates management activities that might disrupt ecological processes and hydrologic connectivity, diminish organic soils, and/or compromise ecological integrity and resiliency.

10. Livestock grazing is a stressor of sagebrush communities, which is well supported by both the literature and an abundance of site-specific, long-term monitoring data. Grazing can and has affected the vegetation composition, structure, cover, and density of sagebrush communities. Removal of vegetation also affects total effective ground cover. This is supported by hundreds of permanent study points in sagebrush on the Ashley National Forest. With that said, desired condition has been and can be achieved and maintained concurrent with livestock grazing, which is also supported by the literature and by site-specific, long-term monitoring. Over the course of history, most allotments have documented adjustments in stocking rates, season of use, management actions, vegetation treatments, etc., to correct or improve unsatisfactory rangeland conditions in sagebrush communities. To conclude, the draft EIS notes and discusses other important stressors of sagebrush, including fire, drought, and invasive plants.

11. Chapter 2 of the draft EIS highlights and analyzes the differences in the alternatives. No formal discussion or alternative comparisons of noxious weeds are found in chapters 2 or 3 of the draft EIS because integrated plan components for noxious weeds are common across all alternatives and are based on needs for change identified in the assessment of forest resource condition and trends. Plan components are listed and described in alternative B (appendix E; the forest plan).

12. Chapter 2 of the draft EIS highlights and analyzes the differences between the alternatives. No formal discussion or alternative comparisons of threatened and endangered and species of conservation concern are found in chapters 2 or 3 of the draft EIS because integrated plan components for these plants are common across all alternatives and are based on needs for change identified in the assessment of forest resource condition and trends. Plan components are listed and described in alternative B (appendix E; the forest plan).

13. Aspen is an important vegetation community that exists throughout the montane regions of the Ashley National Forest. Livestock grazing is authorized and occurs in most aspen woodlands across the forest. Aspen sustainability relies on modes of regeneration (catastrophic, continual, episodic), which are discussed in detail in the forest plan assessment. These sprouting events usually occur following tree mortality disturbances such as fire. Since ungulate browsing is a stressor to aspen sprouts, allowable use of "no greater than 50% of current year's growth" of preferred livestock forage is applicable forestwide. The utilization guideline (FW-GD-ASPEN-02) parallels that which is found in the livestock grazing section of the forest plan (FW-GD-GRAZ-01). These guidelines are supported in the literature and by decades of short-term and long-term monitoring on the Ashley National Forest, which is considered best available science. Hundreds of permanent study sites in persistent and seral aspen validate the guideline. Additionally, the guideline provides utilization exceptions if "long-term monitoring and research demonstrates that a different allowable use level is appropriate."

14. Guidelines FW-GD-VEGTER-01 and 02 are consistent with direction given in the Forest Service native plant materials policy (Forest Service 2012). Nonnative plant materials with moderate to high resource values and proven capability to compete with invasive plants that do not invade and displace neighboring resilient native communities may be considered for restoration purposes where native vegetation communities are degraded and the reestablishment of a native plant community is not likely to occur either through natural regeneration or seeding of native plant materials.

15. Forestwide plan components for terrestrial vegetation are meaningful and applicable, especially in regard to current conditions and trends on the Ashley National Forest. The initial phase of the forest plan revision was to inventory forest resources. For terrestrial vegetation, this required descriptions of the natural range of variability and current conditions and trends for important vegetation communities; an assessment of departure of current condition, if any, from natural range of variability; identification and discussion of impacts of drivers and stressors on these communities; and a prediction of trend into the foreseeable future. Most plan components are forestwide because they are applicable to all terrestrial vegetation. As stated in the Terrestrial Vegetation introduction, plan components were "designed to maintain or restore ecological function and vegetation integrity and resilience. . . . Plant community attributes, such as composition, structure, species richness, ground cover, and disturbance response, are plan component indicators. These indicators are used to define, measure, and evaluate ecological function, integrity, resilience, and sustainability. Terrestrial vegetation on the Ashley National Forest can be adequately assessed, for the most part, using these attributes." Additionally,

nonnative species referred to in FW-GD-VEGTER-02 were fully discussed during the assessment. Standards for nonnative species are unnecessary. Guidance in the guideline states, "Nonnative plant materials should have moderate to high resource values with proven capability to compete with invasive plants, but they should not invade and displace neighboring resilient native communities." This limits the type of nonnative plants that can be used for restoration purposes.

Vegetation – Forested

Letter numbers 24, 62, 64, 72, 74, 123, 126, 128

Issue Statements

1. Under the Alpine vegetation type description (page 88), add more detail about the influence of climate change on alpine vegetation because alpine ecosystems are often ranked as highly vulnerable to climate change. Review recommended literature for inclusion.

2. The guidelines for aspen restoration should be revisited and sources included for these guidelines. The following sources should be consulted in development of these guidelines: Kitchen et al 2019, Rogers 2017, Rogers et al 2014, Olmsted 1979, and Jones et al 2009. Rationale should be provided for inclusion of the 50 percent use limit on herbaceous protects aspen regeneration from browse, and the Forest should consider removal as this guideline is too prescriptive and should not apply across the Forest. Rather, allow project-level NEPA to determine the appropriate vegetation objectives and management practices to achieve those objectives. Additionally, the exception only can occur with both long-term monitoring *and* research.

3. The five coniferous forest types should each have their own discussion of Influences of Drivers and Stressors, Comparison of Natural Range of Variation, and Current Conditions with consistent inclusion of potential threats from climate change (see Halofsky et al. 2018, part 1). Additionally, chapters 6 and 7 of Halofsky et al. (2018) should be referenced for more detailed information on the effects of climate change for all cover types referenced in the draft EIS. The Forest Service should consider changing ambiguous statements on "if" climate continues to warm to "as" climate continues to warm.

4. The Forest Service should expand upon what "plant species richness is within the range of variability" means.

5. The current condition, composition, and productivity of the conifer stands in the Ashley National Forest should be characterized and the effects of past timber projects and livestock grazing on forest stand structure, understory plant communities, and woody residue should be addressed. Security cover should be identified and mapped, and the forest plan should be designed to retain and promote security cover. These elements should be analyzed to meet the intent of NEPA and the National Forest Management Act.

6. Under desired conditions FW-DC-FVA 01, "Invasive plant species might be present, but these do not disrupt ecological processes nor diminish community resilience," the standard should be provided and this source should be referenced: Stohlgren, T. J., D. Binkley, G. W. Chong, M. A. Kalkhan, L. D. Schell, K. A. Bull, Y. Otsuki, G. Newman, M. Bashkin, and Y. Son. 1999. Exotic plant species invade hot spots of native plant diversity. Ecological-Monographs 69:25–46.

7. The desired conditions for aspen should include more detail, and the plan should also address post-treatment or general landscape pre-treatment protections from browsers.

8. Inconsistencies within the plan on whether vegetation treatments will occur on an annual or decadal basis should be addressed. The total acres of timber harvest and vegetation treatments should also be correctly stated and consistent throughout.

9. Under desired condition FW-DC-FVA 02, "Aspen stands, both seral and persistent community types, regenerate sufficiently to maintain long-term sustainability, especially following disturbances. New aspen sprouting should occur equal to, but may extend beyond, the pre-disturbance perimeter," more details about recruitment, versus simple regeneration, should be included.

10. The use of timber harvests as an approach to controlling bark beetles is not scientifically sound (see Six et al. 2014).

11. The Forest Service should not assume that all pinyon and juniper woodlands that occur on the Forest are persistent. Are there any nonpersistent pinyon-juniper woodlands (e.g., mountain big sagebrush communities that have been replaced by pinyon-juniper woodlands) on the Forest?

Responses

1. Descriptions and comparisons of natural range of variation and existing condition, detailed analyses of associated drivers and stressors, with documented and/or predicted future trends of alpine vegetation types occurred during the assessment phase of the Ashley forest plan revision (see Huber et al. 2017, p. 184). Additional detail in the forest plan is unnecessary.

2. Kitchen et al. (2019), Rogers (2017), and Rogers et al. (2014) were not reviewed during forest plan assessment because these publications were not available at the time. These have now been reviewed, as have Olmsted (1979) and Jones et al. (2009). Plan components FW-GD-ASPEN-01 through 04 regarding aspen resilience and long-term sustainability are consistent with the recommendations of these publications. Additionally, these guidelines are a result of the analysis that occurred during forest plan assessment. The analysis is based on hundreds of permanent study points monitoring aspen, referenced from approximately 22,500 studies located throughout the Ashley National Forest. Site-specific data is considered best available science.

   Guideline FW-GD-ASPEN-02 is similar to the utilization guideline found within the Livestock Grazing section (FW-GD-GRAZ-02), in that livestock utilization is limited to 50 percent, unless long-term monitoring and research demonstrates a different allowable use level. The guideline provides flexibility to address project-level conditions related to livestock grazing. Additionally, long-term monitoring data derived from hundreds of aspen studies on the Ashley National Forest confirm that 50 percent or less utilization of key forage species in aspen communities minimizes livestock browsing of new suckering within mature as well as recently disturbed (e.g. fire) aspen stands. Long-term data also demonstrates that moderate livestock grazing (e.g. ≤ 50% use) reduces or eliminates the need of change in livestock management or temporary rest from grazing in recently disturbed aspen stands as prescribed by Kitchen and others (2019).

3. The influences of drivers and stressors on the five coniferous forest types, as well as comparison to natural range of variation, current conditions, and impacts due to climate change, are described in detail in the Terrestrial Report of the Forest Plan Assessment (Huber et al. 2017). The draft EIS incorporates this assessment report by reference. Ambiguous statements have been corrected.

4. Plant species richness is simply the number of different species found in a community or habitat such as aspen. Natural range of variability is the variation of ecological characteristics and processes over scales of time and space, with a timeframe long enough to capture the full range of variation produced by dominant natural disturbances such as fire, drought, flooding, and changes in climate. Species richness within the natural range of variability is the range of different species (from the least to most) that are known to occur within a community or habitat type while existing within its natural state. Ranges for community species richness are derived from reputable publications and reference areas, including exclosures, that minimizes anthropogenic activities such as livestock grazing and recreation. The Ashley National Forest cites hundreds of studies, referenced from approximately 22,500 study points, that are applicable to develop ranges of species richness in major vegetation communities such as aspen, sagebrush, and alpine. This data is considered best available science. The term and definition for "species richness" and "species richness within the natural range of variability" have been added to the glossary of the final EIS.

5. Security cover for wildlife is typically regarded as forested areas. The desired conditions and guidelines in the Forested Vegetation section of the plan will maintain forested areas across the plan area, thus providing security areas for wildlife.

6. As stated in the forest plan, a desired condition is a description of specific social, economic, or ecological characteristics of a defined area toward which management of the land and resources should be directed. Desired conditions must be described in terms that are specific enough to allow progress toward their achievement but not include completion dates. Desired conditions should include components with benchmarks or thresholds so that assessments of compliance or departure related to desired condition can be made. In plan component FW-DC-ASPEN-01, there are several components of desired condition with measurable or overall detectable qualities, including "Invasive plant species might be present, but these do not disrupt ecological processes nor diminish community resilience." Ecological processes and resilience are detectable qualities that can be assessed for condition and trend. With consistent, long-term monitoring of these and other aspen desired condition components (e.g., height class, vegetation composition, ground cover), assessments can be made to determine condition, trend, and compliance to or departure from desired condition. An additional standard is not necessary because benchmarks and thresholds have been built into the desired condition to provide reference and trigger action if necessary.

   Stohlgren et al. (1999) was reviewed and considered. Currently, few noxious or invasive plant species have established within aspen-dominated communities. The exception is musk thistle, but this noxious weed has not yet demonstrated the capacity to alter ecological processes or community resilience in aspen, including vegetation composition.

7. Desired conditions for aspen (FW-DC-ASPEN-01 and 02) are consistent with plan component requirements found in the 2012 Planning Rule at 36 CFR 219.7. Aspen desired condition statements consist of specific ecological characteristics applicable for that community type. These include structure, ecological function, distribution, composition, species richness, ground cover, sustainability, and resilience. These are either measurable or they at least have detectable qualities. Aspen desired conditions include benchmarks or thresholds so assessments to determine condition, trend, and compliance to or departure from desired condition can be made. Furthermore, guidance is given in plan components FW-GD-ASPEN-01 through 04 for recently disturbed aspen communities. These forestwide mitigations reference vehicle disturbances,

livestock grazing, and aspen treatment strategies. Additional site-specific mitigation measures would be designed, analyzed, and implemented at the project level. Forest plan aspen guidelines resulted from analysis conducted during the forest plan assessment. The Ashley National Forest cited hundreds of studies, referenced from approximately 22,500 study points, that are applicable to aspen. This data is considered best available science.

8. Inconsistencies and errors have been reviewed and corrected as necessary.

9. To clarify the differences between aspen regeneration and recruitment, additional language has been added to plan component FW-GD-ASPEN-02. Also, terms and definitions for recruitment and regeneration in reference to aspen have been added to the glossary.

10. Six et al 2014 does not state that the use of timber harvest is not scientifically sound but rather states the pros and cons to this management strategy. This publication is clarified in Fettig et al 2014, which outlines management strategies for both bark beetle suppression and prevention in the western United States. Actions that are short-term and suppressive in nature such as sanitation harvest, fire, pheromones, and insecticides act as direct controls on bark beetles. Preventative actions offer indirect control and may entail preventative thinning, a well-documented management tool that can improve tree vigor and reduce susceptibility to bark beetle attack by altering stand conditions (Webb 2017), including age class and species composition. The objective of such harvest operations is not to stop a large-scale beetle outbreak like those that have occurred in recent decades but rather to reduce the probability and severity of future infestations within treated areas. Prevention treatments are expected to be used in accordance with insect activity with consideration for host abundance, bark beetle presence, proximity to bark beetle-caused mortality, and bark beetle population status before implementing prevention techniques.

11. The Forest Service has not made the assumption that all areas with pinyon and juniper that occur on the Forest are persistent woodlands. Preliminary mapping of persistent pinyon-juniper and nonforested vegetation is complete. There are areas mapped and typed as non-forested (e.g., brush) even though pinyon-juniper has increased in cover. At project- or site-specific scales, mapping would be fine-tuned as needed using keys (Romme et al. 2007, table 1) to help distinguish between areas that are persistent pinyon-juniper and areas of potential pinyon-juniper expansion into nonforested vegetation types.

Vegetation – Other

Letter number 64, 72, 101

Issue Statements

1. Claims that sagebrush communities dominated by nonnative grasses are in “satisfactory condition” should be explained in terms of management goals and desired condition, and livestock grazing as a driver or stressor of sagebrush communities should be more thoroughly discussed. Additionally, the word “limited” should be removed from the following sentence: “In relative terms, sagebrush has limited recreation value.”

2. Livestock grazing and climate change should be evaluated as stressors to alpine ecosystems.

3. The Forest Service should consider removing “02 Within the Anthro Plateau land type association, change no less than 200 acres of mountain big sagebrush every 5 years during the life

of the plan from 20 percent or greater canopy cover, to less than 5 percent canopy cover to enhance brood rearing and summer habitat for greater sage-grouse." This is not in accordance with the metrics from current greater sage-grouse management recommendations.

4. Noxious and invasive plants are slowly replacing native forage for elk and other species. The Forest Service should actively manage landscapes to control and reduce noxious weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Native plant communities provide the highest nutritional value for wildlife, thus the Forest Service should use native plant seed mixes in all restoration work.

Responses

1. Many sagebrush communities, particularly mountain big sagebrush, were plowed and seeded with nonnative perennial grasses between 1940 and 1960. Most of these seedings have persisted since that time but with moderate to considerable increases in density and cover of native perennial graminoid and forb species. These communities are in satisfactory condition in terms of ecological function, condition, and resilience. Sagebrush continues to be the driver of these communities. Sagebrush and other shrub associates return within expected intervals following disturbances such as fire. Invasive annuals are absent or of low presence. Although at the lower end of the range, plant species richness is within or close to the natural range of variation. Total effective ground cover is within 85 percent of potential for these sagebrush communities. Plants of moderate to high resource value dominate vegetation cover, including fair to good representation from perennial native plants. These conditions meet desired condition elements enumerated in the forest plan components. The primary factor of sagebrush communities trending away from desired condition and natural range of variation is the establishment, spread, and dominance of annual invasive species. Additional discussion concerning livestock grazing as a stressor to sagebrush communities has been added to the final EIS. Finally, edits have been made to the specified sentence so that it now read "in relative terms, sagebrush has less recreational value than other areas of the Forest."

2. Livestock grazing and climate change were specifically evaluated as stressors to alpine ecosystems during the assessment phase of forest plan. Refer to the Ashley National Forest Assessment, Terrestrial Ecosystems, System Drivers, and Stressors Report (Huber et al. 2017) for the complete analysis. The draft EIS summarizes the findings of that assessment and highlights key trends.

3. Sage grouse habitat on Anthro Mountain consists of mountain big and black sagebrush communities with no riparian corridors or open meadows. In cooperation with Utah Division of Wildlife Resources and Utah State University, sage grouse movements and uses, including those of brood-rearing hens, have been tracked and analyzed using telemetry data for over 20 years on Anthro Mountain. With the lack of riparian areas and open meadows, areas of burned mountain big sagebrush are focal areas for sage grouse brood rearing. Plan component FW-OB-SAGE-01 is consistent with greater sage-grouse management recommendations. The plan component is only applicable to the Anthro Mountain Plateau landtype association of the Ashley National Forest. Site-specific data is considered best available science

4. Plan components applicable to all the alternatives support an integrated approach to reduce the establishment, suppress the spread, and minimize the impacts of noxious and invasive plant species while maintaining or improving ecological conditions of terrestrial vegetation. Plant-related components include FW-DC-VEGTER-01, 02, 05, 08; FW-GD-VEGTER-03, 04; FW-

GO-VEGTER-01, 02; FW-OB-PJ-01; FW-GD-PJ-01; and FW-OB-VEGNF-01. Plan components are designed to enhance and/or maintain healthy, resilient native communities but also provide additional restorative direction for vegetation communities seriously compromised by or highly susceptible to noxious weeds and invasive plants (FW-DC-VEGTER-06, FW-GD-VEGTER-01through 04, FW-GO-VEGTER-03 and 04). These plan components are supported by an abundance of forest-specific data, which is considered best available science.

Watersheds and Aquatic and Riparian Ecosystems

letter numbers 24, 45, 62, 64, 72, 74, 90, 99, 123, 125, 126, 128

Issue Statement

1. The Forest Service should consider the following edits to the Watersheds and Aquatic and Riparian Ecosystems analysis of the draft EIS to clarify discussion and/or provide factual corrections:

   a. On page 12 Under the Elements Common to All Alternatives: “Provide protection for riparian areas.” This language should be changed to “Manage riparian areas.”

   b. On page 60: After the following sentence, “Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory from livestock and wild ungulates, fire suppression, roads, and motorized recreation,” include the following text: “Nonmotorized recreation can also affect stream dynamics and hydrology, such as nonmotorized trail improvements near streams.”

   c. On page 60: “At higher elevations in the Uinta Mountains, these include a glacial lake, potholes, kettle ponds, and beaver ponds.” This should be consistent with page 64, which states there is more than one glacial lake.

   d. On page 60: “Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory from livestock and wild ungulates, fire suppression, roads, and motorized recreation.” This should be revised to “Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory streambank damage and soil compaction from livestock and wild ungulates.” The sentence should also include nonmotorized recreation as a stressor.

   e. On page 62: “There are 14 pipelines that traverse parts of the Ashley National Forest, three of which are used for electricity generation.” This sentence should be revised because Moon Lake Electric is decommissioning the electricity generation facilities in the Yellowstone Canyon and Uinta Canyon areas and the associated pipelines will be removed.

   f. On page 63: “Several municipalities extend their protection areas onto the Ashley National Forest, including the following municipalities in Utah: City of Green River, Duchesne, Whiterocks, Tridell, Vernal, Manila, and Dutch John.” This sentence should clarify which state, Utah or Wyoming, the City of Green River is located in.

   g. On page 63: “This objective includes securing water rights for waters not reserved, in accordance with state laws, for water needed on acquired lands and securing rights on reserved lands . . .” This should be revised to “This objective includes securing water rights for waters not reserved, in accordance with state law and interstate Compact constraints, for water needed on acquired lands and securing rights on reserved lands . . .”

h. On page 64: After the following text, "Herbaceous-dominated ecosystems are typically dominated by a mix of grasses," include the following text: "and grass-like species."

i. On page 67: "In riparian areas, vegetation will be treated to move it toward the desired conditions. This will be primarily to restore native species composition and reduce the encroachment of such species as conifer trees and salt cedar, where appropriate." This should be revised to "In riparian areas, floodplain connectivity will be improved in order to restore conditions that support native, riparian vegetation. This may also be done in conjunction with removal of conifer trees and salt cedar, where appropriate."

j. On page 72: "These protective plan components would reduce impacts on water quality from surface disturbance, recreation, and motorized and nonmotorized users." This should be revised to "These protective plan components would reduce impacts on water quality from surface disturbance, recreation, and motorized and nonmotorized users but may prohibit certain restoration projects that could benefit water quality in the long term."

k. On page 72: "This raises the possibility of increased sedimentation, higher water temperatures, and shifts in flood severity or frequency, essentially destabilizing watersheds." This should be revised to "This raises the possibility of increased sedimentation, higher water temperatures, and shifts in flood severity or frequency, essentially destabilizing watersheds when compared to alternatives B and D."

l. On page 72: "The threat of uncharacteristic wildfire would continue and be the highest of all alternatives." This should be revised to "The threat of uncharacteristic wildfire would continue and would be the highest of all alternatives, except for alternative C, which would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and where allowing wildfires to burn would be the main fuel treatment."

m. On page 74: "The threat of uncharacteristic wildfires would continue and would be the highest under all alternatives the overall watershed condition would be at risk from uncharacteristic wildfires with the potential to reduce overall WCF scores." This should be revised to "The threat of uncharacteristic wildfires would continue and would be the highest under all alternatives (except for alternative C); the overall watershed condition."

n. On page 76: "Recommended wilderness areas include extra protection for riparian and wetland vegetation, including restrictions on surface disturbance, development, and access that would preserve riparian and wetland vegetation and structure in these areas; however, restrictions on restoration in recommended wilderness could affect the Forest Service's ability to improve these riparian, wetlands, and possibly fen communities." This should be revised to "Recommended wilderness areas include extra protection for riparian and wetland vegetation, including restrictions on surface disturbance, development, and access that would preserve riparian and wetland vegetation and structure in these areas; however, restrictions on restoration and fuels management in recommended wilderness could affect the Forest Service's ability to improve and protect these riparian, wetlands, and possibly fen communities."

o. On page 78, the Effects from Designated Areas section is missing.

p. On page 79: After the following text, "Impacts on water quality would be reduced, compared with alternative A, from reductions in surface disturbance, restrictions on motorized travel,

and a reduction in the concentration of recreation users," include the following text: "However, areas with special designations rely more on natural processes rather than active fuels management and restoration projects, which can lead to increased risk of uncharacteristic wildfire and resultant negative impacts on water quality from 'flood after fire' events."

q. On page 80: After the following text, "Alternative C would reduce disturbance from such activities as recreation and mechanical treatments, compared with alternative A; however, additional constraints on restoration treatments could also affect the effectiveness of restoration," include the following text: "Alternative C would rely more on natural processes, which could leave riparian vegetation at greater risk for uncharacteristic wildfire."

r. On page 83: "Beyond the Ashley National Forest boundary, past, present, and future actions by other entities, as well as activities associated with rural residential communities." This should be revised to "Beyond the Ashley National Forest boundary, past, present, and future actions by other entities, as well as activities associated with rural residential communities, impact watersheds and aquatic and riparian ecosystems."

2. The Forest Service should review calculations throughout the Watersheds and Aquatic and Riparian Ecosystems analysis. The following inconsistencies should be corrected:

a. On page 65, table 3-8, Total Average Size (Acres)—the math doesn't average when totaled and divided. The Forest Service should redo the math and provide an explanation of how average acres are determined.

b. On page 66: "Conifers are encroaching across elevations on the Uinta Mountains, with 500 acres observed during vegetation mapping (Forest Service GIS 2020). Conifer encroachment is common for the mid- to low elevations and is likely attributed to fire suppression." Are the 500 acres only found at one elevation?

c. On page 71: "In general, watersheds with more than 1 mile of road per square mile can be considered to have moderate to high road density (Forest Service 2011c)." If a road were 20 feet wide, a mile of road would occupy 105,600 square feet or 2.42 acres of a 640-acre square mile. This is only 0.00378 percent of a square mile occupied by roads and should not be considered a moderate to high road density.

d. On page 73: The text states there are 1,000,700 acres of active allotments, but on pages 24 and 248 under alternative C, it states there are 919,700 acres available.

e. On page 79: "Livestock grazing would be restricted in destination recreation areas under alternative C. This would remove 13,000 acres from grazing and would eliminate potential impacts on water quality for streams." This statement implies that all destination recreation management areas are near streams.

f. On page 80: "Alternative C would reduce acres available for active grazing allotments by 130 acres." This should be revised to 13,000 acres.

3. The Forest Service should use active management for wildfire suppression in wilderness areas to reduce the long-term risk of uncharacteristic wildfire and promote the success of restoration projects. This would ensure proper functioning condition and the long-term viability of watersheds and riparian ecosystems. In addition, the proposed special designations in existing

wilderness areas are not necessary because there are existing protections against management activities in wilderness areas.

4. The Forest Service should review and include other scientific literature that identifies the potential benefits of livestock grazing on watersheds, aquatics, and riparian ecosystems. The study by Neff et al. (2005) took place in southeast Utah, where the climate and soils may be different than northern Utah and at higher elevations found in the Ashley National Forest.

5. The Forest Service should partner with the State on the implementation of programs such as the Grazing Improvement Program to reduce impacts to water quality while also supporting continued livestock production and big game hunting on the Ashley National Forest

6. The final EIS should include an analysis of the role of beaver in maintaining healthy riparian and stream habitats and how the loss of beaver in history was a significant driver of degraded conditions in many Utah streams. At a minimum, this analysis should reference Wohl (2021).

7. The Forest Service should prepare a separate and detailed watershed and riparian conservation strategy based on the findings of the Riparian and Wetland Ecosystems of the Ashley National Forest, Assessment of Watershed Vulnerability to Climate Change for the Uinta-Wasatch-Cache and Ashley National Forests, Utah, and the Forest Service's watershed condition framework. The watershed and riparian conservation strategy should identify specific desired conditions to protect and restore ecological integrity of watersheds, riparian areas, and water quality and water resources and identify priority watersheds for protection, maintenance, and restoration.

8. The forest plan should include management to maintain or restore the ecological integrity of riparian areas in the plan area, including plan components to maintain or restore the structure, function, composition, and connectivity. There should be more standards and guidelines for streams, seeps, and wetlands, including fens, to establish greater protections and applied management for the desired conditions and goals.

9. The forest plan should include additional language for FW-OB-WA-01 that allows for watershed restoration to begin prior to the end of the 10 years for the preceding two restoration efforts to allow for overlap with the life of the plan. This could be beneficial for ongoing watershed improvement projects that exceed the 10-year requirement but do not exceed the life of the plan.

10. The final EIS should include a description of the amount of saltcedar that has invaded the forest and riparian areas. It is not clear what the extent of this invasive species is.

11. Reliance on best management practices to protect aquatic resources is a flawed approach. Research suggests best management practices increased watershed and stream damage because they encourage heavy levels of resource extraction under the false premise that resources can be protected by best management practices (Stanford and Ward, 1993 [94], Rhodes et al., 1994 [95] Espinosa et al., 1997). Stanford and Ward (1992) termed this phenomenon the "illusion of technique." Page 92: See Ziemer, R.R., and T.E. Lisle, 1993, Evaluating sediment production by activities related to forest uses—A Northwest Perspective. Proceedings: Technical Workshop on Sediments, Feb. 1992, Corvallis, Oregon. Pp. 71–74. Page 93: Espinosa, F.A., Rhodes, J.J. and D.A. McCullough. 1997. The failure of existing plans to protect salmon habitat on the Clearwater National Forest in Idaho. J. Env. Management 49(2):205–230. Page 94: Stanford, J.A., and J.V. Ward., 1992. Management of aquatic resources in large catchments: Recognizing interactions between ecosystem connectivity and environmental disturbance. Watershed Management:

Balancing Sustainability and Environmental Change, pp. 91–124, Springer Verlag, New York. Page 95: Rhodes, J.J., Espinosa, F.A., and C. Huntington. 1994. Watershed and Aquatic Habitat Response to the 95-96 Storm and Flood in the Tucannon Basin, Washington and the Lochsa Basin, Idaho. Final Report to Bonneville Power Administration, Portland, Or.

12. The Forest Service does not address whether surface waters governed by Wyoming law are meeting their designated uses or otherwise complying with Wyoming water quality standards. Similarly, the Forest Service mentions 303(d) listing as being a factor in determining watershed condition in the Air, Soil and Watershed Resources Assessment Report on pages 93–94, and 97 but fails to map these impaired waters, explain how this impairment is considered in the overall assessment, or 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. The Forest Service fails to specify the Utah water quality standards applicable to the Ashley National Forest. By rule, all waters in the Ashley National Forest in Utah, have been designated as Category 1 waters (Utah Administrative Code R317-2-12.1). In Utah, Category 1 waters are given the same protections granted to outstanding national resources waters under the Federal antidegradation policy. The draft forest plan must ensure that Forest Service management activities and decisions comply with this Utah water quality standard.

13. The draft EIS may be using riparian and meadow wetlands terminology interchangeably or lumping those habitats. Descriptions of these vegetation and habitat communities should be described separately as they need to be managed differently. Recommendations from this source should be incorporated: Surfleet et al. 2020. Hydrologic Response of a Montane Meadow from Conifer Removal and Upslope Forest Thinning. Water. 12. Doi:10.3390/w12010293.

14. The Forest Service should edit the language related to the impacts from designated areas on page 76 to acknowledge that restrictions on fuels management in recommended wilderness could affect the Forest Service's ability to improve and protect riparian, wetlands, and possibly fen communities.

Responses

1. Comments noted, and in a majority of cases modification/corrections have been made based on the input.

    a. As stated in the revised plan: "Riparian management zones (RMZs), with associated plan components, are established to protect the ecological integrity of these areas from potential harmful effects of catastrophic wildfire, unmanaged recreation, and potential overgrazing." The Forest acknowledges that the riparian management zone is a management zone for the protection of the ecological integrity of zone. Language has been added to the passage about managing and providing protection for riparian areas.

    b. A statement that nonmotorized recreation can also have localized effects in areas of concentrated use has been added to final EIS.

    c. The passage has been edited as suggested.

    d. A statement that nonmotorized recreation can also have localized effects in areas of concentrated use has been added to final EIS.

    e. The passage has been changed based on the comment

f. A small edit was made based on the comment to clarify that Green River is located in Utah.

g. This Passage has been changed based on input from the Forest Service Intermountain Region office.

h. The edit has been made based on the comment

i. The original language in this statement has been retained. Stream/floodplain connectivity falls under the general statement on aquatic habitat restoration that appears on this page. Language has been added to watershed aquatic and riparian ecosystem management approach 06 in the forest plan based on this and other public comments: "Seek opportunities for restoring down-cut/aggraded channels, floodplain function, and water table availability to riparian and wetland vegetation."

j. This passage has since been altered and the statement commented on no longer appears. The suggested language does appear later under the analysis of the action alternatives.

k. The passage has been edited for clarity. It now reads: "The threat of uncharacteristic wildfire would continue and would be the highest under all alternatives, posing increased risk for sedimentation, higher water temperatures, shifts in flood severity/frequency, and other destabilizing effects."

l. Passage revised for clarity, but suggested language about alternative C in comment not incorporated, based on measures assumption is wildfire risk would be highest with Alt A.

m. Suggested language about alternative C in comment not incorporated, based on measures the assumption is wildfire risk would be highest with Alt A.

n. Section on effects from designated areas revised based on Alternative B modified in final EIS, which would include the same two suitable wild and scenic river segments and RNAs as alternative A

o. This is intentional. Under the topic of overall watershed condition, discussion of designated areas does not appear for any of the action alternatives.

p. An addition has been made based on the comment.

q. The suggestion in this comment is covered in the section Effects from Vegetation and Fire Management that follows the section mentioned in the comment. A statement regarding limitations of restoration options was added to the passage.

r. Correction has been made based on the comment.

2. Comments noted, and in a majority of cases modification/corrections have been made based on the input.

a. The table has been edited/clarified based on the comment.

b. A correction has been made to the paragraph; the error has been removed.

c. Units were retained as they are consistent with established methodology. The default density classes provided in the Forest Service's Watershed Condition Classification Technical Guide

(Forest Service 2011b, p. 26) are expressed in miles/square mile. Class breaks are based on road density classes in A Framework to Assist in Making Endangered Species Act Determinations of Effect for Individual or Grouped Actions at the Bull Trout Subpopulation Watershed Scale (USFWS 1998, p. 23).

d. The correct acreage is 919,700. The final EIS has been modified to correct this conflict. The error has been corrected.

e. The comment was considered, but the text was retained regarding streams located in destination recreation management areas.

f. The passage has been clarified based on the comment.

3. The Wilderness Act and related regulations limit the type of treatment options that can be performed in these areas.

4. The passage in the EIS and associated references have been updated based on the comment.

5. The draft plan has incorporated management approaches under Working and Coordinating with Tribes, Partners and Cooperators (07 and 10 on pp. 103–104). This topic was discussed in the Ashley National Forest's assessment (Forest Service 2017) and the technical reports informing the assessment, drawing on references that predate Wohl (2021). This document will be retained and referenced in the future during project-specific analysis and planning involving beaver and beaver dam analogs.

6. The suggested literature source will be retained and used for site-specific NEPA analysis for projects involving beaver and beaver dam analogs. This topic was discussed in 2017 assessment documents. The aquatic ecosystems report (Plunkett 2017) covered the topic and gave local examples of beaver activity improving riparian conditions. It was also mentioned in Dwire and Smith (2016). Table 7 in the Air, Soil, and Watershed Resources technical report (Bevenger et al. 2017) identified landtypes on the Forest where beaver play a role forming the riparian systems. This is addressed in the draft plan at FW-DC-WA-05 and in Watershed Aquatic and Riparian Ecosystems management approach 02.

7. The forest plan is a strategy developed based on findings of the assessment phase of plan revision. Technical reports informed and were cited in the draft EIS and informed the components and management approaches chosen for the plan. Examples include FW-GL-WATER-01, FW-DC-RMZ-03, FW-GL-RMZ-01 through 04, FW-GL-VEGTER-03, FW-DC-TRAIL-02, FW-GL-TRAIL-02, FW-GL-MINL-04, FW-DC-ROAD-05, 07, FW-ST-ROAD-02, FW-GL-ROAD-02, FW-ST-RAREHABH-01, FW-GL-FIRE-01,03, FW-ST-TIMB-01, 04, 08,10, FW-GL-TIMB-01, 02, FW-GL-GRAZ-01, 02, FW-GL-AIR-01, and Watershed Aquatic and Riparian Ecosystems management approaches 01–09. Priority watersheds are a part of the forest plan and are discussed in attachment A of the draft plan.

8. Desired condition plan components in the revised forest plan concerning riparian areas, seeps, streams, and wetlands include FW-DC-WATER-01, 03 ,04, 06, 07, and FW-DC-RMZ-01. Other related plan components to attain/maintain desired conditions include FW-ST-ROAD-02, FW-GL-ROAD-02, FW-GL-MINL-04, FW-GL-RMZ-01 through 05, FW-GL-WATER-01 through 03, FW-OBJ-WATER-01 through 03, FW-OB-VEGNF-01, and FW-ST-RAREHAB-01. Appendix 3 in the revised forest plan contains management approaches that are also intended to protect, restore, and maintain streams, and wetland and riparian area characteristics described in desired

conditions. Examples include Watershed Aquatic and Riparian Ecosystems management approaches 01–07 and Fisheries management approaches 03–06. In response to comments, the updated version of the forest plan contains language modification to Watershed, Aquatic, and Riparian Ecosystems management approaches 5 and 7 for clarity regarding floodplain/stream and spring/wetland function. FW-DC-WATER-03 was modified to include springs and riparian areas. Two additional guidelines were adapted from management approaches regarding the use of best management practices to protect aquatic resources (FW-GL-WATER-03) and the use of vegetation management activity in riparian management zones (FW-GL-RMZ-05).

9. The language in the objective states "at least" 2 per 10 years and does not prevent a faster pace. Nor does it prevent the intent to have more than two focus watersheds in place at any one time. Attachment A depicts three priority watersheds in place at the moment. As stated in attachment A of the draft plan, priority watersheds will change over the life of the forest plan. They are reevaluated periodically based on ecological values, restoration goals, regulatory requirements, and changes in Forest Service priorities and those of other agencies, Tribes, organizations, and interested parties.

10. The language has been modified for clarity based on the comment. Saltcedar is one of the invasive species that is targeted by the Forest's weed program. It occurs in lower elevations of the Forest, predominantly along the highwater line of the Flaming Gorge Reservoir and in some locations along the Green River below the dam.

11. Comment and literature sources have been noted. Use of best management practices (BMPs) is a widely practiced and accepted method for controlling nonpoint source pollutants under the Clean Water Act. As policy, the Forest Service incorporates BMPs into land management and works with states in their non-point source pollution programs. Examples are the memorandums of understanding between the Forest Service and the States of Utah and Wyoming, in which it is agreed that BMPs are developed and implemented for forest and rangeland activities with the intent to meet water quality standards (Wyoming DEQ and Forest Service 2016; Utah DEQ 2017). Various published studies have demonstrated the effectiveness of BMPs in reducing nonpoint pollutants. Examples appear in the 2016 EPA Decision Not To Regulate Forest Road Discharges Under the Clean Water Act; Notice of Decision (EPA 2016, pp. 43496–43497, 43509–43510).

12. Figure 3-6 in the EIS depicts the map suggested. The topic also is covered in the water quality discussion on page 61. The watershed condition framework (Forest Service 2011b) contains indicators factored for a watershed's condition rating; water quality impairment status, road density, road proximity, road maintenance, riparian vegetation condition, and upland condition are among the indicators that are factored. The forest plan contains a variety of components and management approaches to maintain and protect waters.

13. In the assessment phase of the plan revision, documents such as the aquatic ecosystems report (Plunkett 2017) and the Natural Range of Variation Report (Dwire & Smith 2016) and Halofsky et al. (2018) on climate vulnerability recognized and assessed riparian and groundwater dependent ecosystems separately. Plan components specific to fens and groundwater-dependent ecosystems are FW-DC-WATER-09,10, FW-OB-WATER-03, FW-GL-WATER-02, FW-ST-RAREHAB-01. Other approaches deemed appropriate for both surface-fed and groundwater-fed habitats list these features combined. Examples are the inclusion of groundwater-dependent ecosystems among the waterbodies in the riparian management zone segment of the plan and guidelines such as FW-GL-TIMB 01. Riparian management zone guidance and precautions

would apply to wetlands, springs, lakes, ephemeral channels, and sensitive or potentially unstable areas in addition to streams and rivers. (In other land management decision documents, these same areas are sometimes termed aquatic management zones.) At the project-specific level, differences in these habitats are recognized and different design and management features are applied.

The suggested reference by Surfleet et al. (2020) has been reviewed for possible incorporation in the final EIS. This reference is a study of hydrologic response (soil moisture water table, water budget) to the removal of conifer in a dry meadow habitat in a montane area of California. The study briefly cites the general importance of removing encroaching conifer for successful meadow restoration but focuses on measuring hydrologic changes, water table increases post treatment, and decreases in shallow soil moisture during the prolonged dry season (June–November) experienced in that region of California. It is unclear whether specific water budget and soil moisture results would apply to snow-melt dominated and summer monsoonal climate of the Ashley National Forest. The article does not give specific recommendations beyond the general treating of meadows for conifer encroachment. Conifer encroachment in meadow habitats was identified and discussed in the assessment phase of plan revision and also identified by long-term vegetation studies of meadow sites on the Ashley National Forest. Plan component FW-OB-VEGNF-01 sets treatment objectives for non-forested habitats based on the assessment findings. This would apply to areas threatened by conifer encroachment.

14. The language mentioned in the issue statement has been modified to improve clarity.

Watersheds, Aquatics, and Fisheries

Letter numbers 24, 64, 76, 90, 99, 123, 126

Issue Statements

1. The Forest Service should prioritize maintenance or relocation of roads and trails to prepare for an influx in travel and ensure the continued health of forest watersheds. The Forest Service should take steps to protect those watersheds that rate either fair or poor on the roads and trails indicator for the Watershed Condition Framework score (85 percent). The Forest Service should consider the potential for increased sediment, higher stream temperatures, and decreased vegetative cover while choosing an alternative that can also accommodate increased travel and recreation. The Forest Service should give special consideration to those watersheds that may be at risk if there is a dramatic increase in road density following the expansion of the Forest's trail systems.

2. The Forest Service should consider the following recommendations for watershed plan requirements and direction to help attain proper functioning condition of waterways:

   a. The draft plan should require preparation of watershed plans and set periodic deadlines as part of a continual and achievable process for ensuring that all watersheds on the Ashley National Forest attain proper functioning condition over time. The forest plan should adopt a methodical approach, envisaging the creation and updating of watershed restoration plans and the restoration of two impaired watersheds every 5 years.

   b. As part of its watershed restoration planning process, the Forest Service should also develop plans to prioritize roads for decommissioning or maintenance.

c. The adoption of the following desired conditions implements these goals: Restoration of any watersheds functioning at risk or as impaired to properly functioning condition is a management priority.

d. Suggested desired condition: Water quality, instream flows and water levels are adequate to maintain and restore riparian resources, channel conditions, fish and aquatic habitat, recreation and scenic values and other natural resources. Watersheds, including the rivers, streams, lakes, meadows, bogs, fens, wetlands, vernal pools, and springs they encompass and the ecosystems they support, function properly based on the features and processes that maintain the physical and biological integrity and resilience of watershed health, including water quality, in-stream flow regimes, physical and biological connectivity, robust riparian and aquatic habitat, stream channel stability, and biotic community structure.

e. To achieve these desired conditions, the following objectives should be adopted: Within three years of plan approval and every subsequent 5 years, develop 5- and 10-year action plans for watershed restoration that will return Priority Class 2 or 3 watersheds to proper functioning condition, including by stabilizing, rehabilitating, and restoring wetlands, lakes, meadows, vernal pools, springs, and fens.

f. Suggested objective: Within 7 years after plan approval and every 5 years thereafter, move at least two Priority Class 2 or 3 watersheds into a Class 1 watershed condition so that the restored watersheds are properly functioning.

g. The following standard, necessary to impede efforts to protect and restore watershed health, should also be adopted: Before authorizing the initiation of an activity that may adversely impact watershed condition, collect sufficient data to represent and document baseline watershed condition. Through the life of the activity, monitor watershed condition with adequate frequency to determine if the activity is adversely impacting watershed function.

h. These guidelines would achieve the goals of the 2012 Planning Rule and the protection and restoration of Forest watersheds: Prioritizing routes in Class 2 and 3 watersheds and watersheds with impaired waters, decommission roads and reclaim user-created routes, focusing on roads that cross or parallel streams and other surface waters so that road densities do not exceed 1.5 miles per square mile.

i. Suggested guideline: Manage activities so that they do not impact the proper function or classification of Class 1 watersheds. Where activities have the potential to impact watershed function in Class 2 or 3 watersheds, manage activities to restore watershed function and to move these watersheds to a properly functioning condition.

j. Suggested guideline: Limited short-term or site-scale effects from activities may be acceptable if they support watershed function improvements.

3. To comply with Utah water quality standards, the Forest Service must—in addition to restoring impaired waters—manage activities on the Forest in a manner that prevents any degradation of existing water quality. To meet the obligation to comply with Utah water quality standards, the forest plan can best address impaired water quality and prevent degradation by requiring that activities be managed so that they do not degrade water quality or prevent the attainment of water quality standards. In contrast, the approach of the draft plan fails to restore impaired streams and

to prevent degradation of Category 1 waters generally, particularly those that are currently impaired.

4. Based on the need to protect water quantity, the Forest Service should exercise its discretion to deny or condition access to State-granted water rights or authorizations located on the lands under its jurisdiction as necessary to protect aquatic and aquatic-dependent resources, including scenic and aesthetic values, and protect fish and wildlife habitat on the Forest. Therefore, the forest plan should establish minimum instream flows and water levels needed to maintain and restore riparian resources and protect and restore these flows and levels, including by conditioning access to water rights.

   Additionally, to adequately protect drinking water supplies, the following desired conditions should be established: Drinking Water Source Protection Zones are properly delineated and activities in these zones are being managed to avoid any potential contamination of or threat to the quality of surface or ground water. Drinking Water Source Protection Plans cover all applicable watersheds, and the terms and conditions of these Protection Plans are being met. Restriction clauses are included in all permits, leases, or other documents authorizing use within municipal supply watersheds. All Forest Service projects or decisions are improving or maintaining and are not degrading drinking water sources.

   The following standards set out these planning and implementation process: Within one year of plan approval and each subsequent year as necessary and in conjunction with the relevant public drinking water supplier, develop a management plan for each Drinking Water Source Protection Zone to maintain and restore water quality and ensure that any Forest activities that have the potential to impact the zone will not cause or contribute to any contamination of surface or ground water. In the year following the development of any Drinking Water Source Protection Zone plan, implement the plan. At least every 4 years, evaluate and revise the plan to ensure that Drinking Water Source Protection Zones are protected and restored. Within 5 years of plan implementation, achieve Class I watershed conditions in every watershed that serves as a source of drinking water. Within 5 years of plan implementation, undertake management actions necessary to ensure that water quality in any surface waters that serve as sources for drinking water and/or recharge sources of drinking water and/or flow-through drinking water protection zones are meeting all relevant beneficial uses and are meeting water quality standards for every pollutant and parameter. Within 1 year of plan implementation and again after drinking water source assessments and protection plans are updated and completed, map the boundaries of all drinking water sources and recharge areas and drinking water protection zones and withdraw these areas from mineral entry and close them to mineral and/or energy leasing. Within 2 years of plan implementation and again after drinking water source assessments and protection plans are updated and completed, revise any existing permits and/or authorizations consistent with drinking water source protection plans to afford the highest protection to drinking water sources and protection zones.

5. Contaminants introduced by livestock grazing, construction and use of roads and routes and the development of minerals should be banned from any watersheds that serve as sources for drinking water. The following standards should be implemented: Close Drinking Water Source Protection Zones to surface-disturbing activities, including mineral leasing, the sale of mineral materials, and locatable mineral entry. Immediately and in keeping with any updated or new drinking water source protection plans, manage all activities on the Ashley National Forest consistent with

drinking water source protection plans and to afford the highest protection to drinking water sources and protection zones.

This guideline should also be included: Manage activities that may impact Drinking Water Source Protection Zones, including road use and maintenance, urban and wildland uses, recreation and other human activities, wild and domestic animals use near source waters, fertilizer and pesticide use, air pollution, and utility corridors, to prevent contamination of and any adverse impact to ground and surface waters and water quality.

6. Water quality monitoring data collected for streams potentially supporting cutthroat trout, tributaries to the Colorado River system, and its threatened and endangered fish species needs to be analyzed and reported. The effects of diversions for livestock and irrigation on stream flows should all be analyzed for the NEPA analysis for the Ashley National Forest plan revision. The cumulative effects from recreation, logging, and vegetation management occurring throughout the Ashley National Forest and the associated livestock grazing and soil damage (erosion, bare soil, compaction) on watershed function and stream flows for threatened and endangered species should be analyzed and reported in this NEPA analysis for the Ashley National Forest plan revision.

7. The Forest Service should update the following objective to include examples of what improving habitat connectivity means: “Improve habitat connectivity along five stream reaches in the first 10 years of plan implementation.”

8. There should be more guidelines to reach desired condition for fisheries.

9. The watershed section of the draft EIS must address the Tribe’s water rights and the need for the forest plan to directly address the priority of the protection of the Tribe’s water supply and water storage. Page 61 should also state that water quality standards do not apply to water bodies within the Reservation boundary because those areas remain Indian Country, not subject to state jurisdiction.

10. The forest plan should recognize that the lack of management activities in special designation areas increases the long-term risk of wildfire and hampers efforts to restore watersheds to properly functioning condition.

Responses

1. There is an objective in place for improving watersheds based on the Watershed Condition Framework and priority watershed process (FW-OB-WATER-01).Plan components regarding road network capacity maintenance and location include (FW-DC-ROAD-04, 05, 07’ FW-ST-ROAD-02, FW-GL-ROAD-02; FW-GL-RMZ-04). Several management approaches address the topic (Transportation Infrastructure 03, Watershed, Aquatic and Riparian 05, 07, 08) As a matter of Forest Service policy, the prioritization and planning to construct, maintain, relocate, or close roads is an interdisciplinary process; watershed conditions and 303(d) status are among the factors considered.

2. a. The plan and the EIS incorporate the Watershed Condition Framework and the watershed condition assessment tracking tool developed by the Forest Service. Restoration plans are developed for priority watersheds (attachment A of appendix E draft plan; appendix B in the revised forest plan). As a matter of policy outside of plan revision, the Forest Service currently uses the watershed improvement tracker. This tracker manages data, observations and planning

details about sites that need to be, or have been, restored or improved with the intent of benefiting watershed and aquatic ecosystem health and function.

b. As a matter of Forest Service policy, the prioritization and planning to construct, maintain, relocate, or close roads is an interdisciplinary process; watershed conditions, 303(d) status, and priority watershed status are among the factors considered. In the draft plan see watershed/aquatics management approaches 05, 08, and 07 and FW-OB-WATER-02.

c. This suggested desired condition was considered but was determined to be covered under existing Forest Service policy and existing laws and regulations.

d. These topics are addressed under the plan components FW-DC-WATER-04, 05, 08, 09, 10; FW-DC-FISH-01, 02, 03, 05, 06; and FW-GL-SOIL-05.

e. The suggested objective was considered but not adopted. Development of restoration action plans for priority watershed would include development of essential projects for water and aquatic resources. This is part of the Watershed Condition Framework process described in attachment A to the draft forest plan and accomplished at a minimum rate described in FW-OBJ-WATER-01. At the forestwide scale (in addition to priority watersheds), the topic is also addressed in attachment B to the draft forest plan: Watershed Aquatic and Riparian management approaches 01–09, and Fisheries management approaches 01–06.

f. FW-OB-WATER-01 has the objective of improving the condition class of at least two priority watersheds every 10 years. This minimum rate was established due to the scale, detail, and timing requirements for some essential projects.

g. Pre- and post-project survey, monitoring, use of best available science, and establishment of project design features would be performed at the project-specific NEPA scale (mentioned in the draft forest plan at FW-GL-SOIL-05 and Watershed, Aquatic, and Riparian Ecosystems management approach 03). As current policy in the Forest Service, outside of individual forest plan scale, National Core Best Management Practices monitoring is performed for selected projects across the National Forest System.

h. As a matter of Forest Service policy, the prioritization and planning to construct, maintain, relocate, or close roads is an interdisciplinary process; watershed conditions, 303(d) status, and priority watershed status are among the factors considered. In the draft forest plan, see also Watershed, Aquatic, and Riparian Ecosystems management approaches 05, 08, 07 and objective FW-OB-WATER-02. The suggested road density goal was considered but not adopted. Class thresholds for road density are part of the Watershed Condition Framework rating system. The decision was to retain those thresholds when scoring watersheds and considering potential improvements.

i. Plan components throughout the revised forest plan are designed to manage, protect, and restore watershed conditions. Some examples are FW-GD-WATER-01, 02, FW-DC-RMZ-03, FW-GD-RMZ-01 through 05, FW-GD-VEGTR-03, FW-ST-ROAD-02, FW-GD-ROAD-02, FW-GD-MINL-04, FW-DC-ROAD-, 05, 07, FW-DC-TRAIL-02, FW-GD-TRAIL-02, FW-ST-REHAB-01, FW-GD-FIRE-01, 03, FW-ST-TIMB-01 through 04, 08, 10, FW-GD-TIMB-01, 02, FW-GD-GRAZ-01, 02, FW-GD-AIR-01, FW-OB-WATER-01 through 03, FW-OB-TRAIL-01, 02, FW-OB-HVRA-01, 02, FW-OB-FIRE-01 through 03, FW-OB-VEGNF-01, FW-OB-CONIF-01, FW-OBJ-PJ-01, and FW-OB-FISH-01 through 04, as well as Watershed, Aquatic, and

Riparian Ecosystems management approaches 01–09. Outside of forest plan revision, existing Forest Service policy and Federal and local regulations and guidance are in place for watershed protection and memoranda of agreement are in place with State water quality divisions for voluntary nonpoint pollution management.

j. This is addressed under FW-GL-WA-01 in the draft forest plan.

3. The revised forest plan and final EIS recognize Federal and State regulation regarding protection of water quality and antidegradation policy. Plan components and management approaches throughout the plan contain direction for preservation of water quality and practices consistent with state and federal nonpoint source pollution strategies. Examples include FW-DC-WATER-08, FW-OB-WATER 01 through 03, FW-GD-WATER-01, 02, FW-GD-SOIL-01 through 05, FW-DC-RMZ-03, FW-GD-RMZ-01 through 05, FW-GD-VEGTR-03, FW-DC-TRAIL-02, FW-GD-TRAIL-02 and O3, FW-GD-MINL-04, FW-DC-ROAD-05, 07, FW-ST-ROAD-02, FW-GD-ROAD-02 and 03, FW-ST-RAREHAB-01, FW-GD-FIRE-01, 03, FW-ST-TIMB-01 through 04, 08, 10, FW-GD-TIMB-01, 02, FW-GD-GRAZ-01, 02, and FW-GD-AIR-01, as well as Watershed, Aquatic, and Riparian Ecosystems management approaches 01–09. Watershed, Aquatic, and Riparian Ecosystems management approach 03 recognizes the development of project-specific best management practices by referring to Forest Service and the most current State nonpoint and silvicultural best management practice manuals. Outside of forest plan revision, existing Forest Service policy, guidance, Federal and local laws, and memorandums of understanding with State water quality divisions also address actions for water quality protection. The 2012 Planning Rule and 2015 amendment give guidance that plan components may be used to carry out laws, regulations, or policies but should not merely repeat existing direction from laws, regulations, or directives. References to other resources are preferred (Forest Service Handbook 1909.12 chapter 22.1).

4. The suggestion of minimum flow requirements is outside the scope of the forest plan revision and the authority of the Forest Service. Under Utah water law, State agencies (e.g., the Division of Wildlife Resources) would be the entities to request or obtain minimum flow rights for wildlife and aquatic species. Mapping, designation of drinking water source protection zones, and updates to source protection plans for public water supplies are established between drinking water providers and the State divisions of drinking water. Guideline FW-GL-WATER-01 in the draft plan addresses compatibility with drinking water source protection plans. An updated energy leasing analysis is not a part of the Ashley forest plan revision.

5. The suggested standards and guideline were considered but not adopted. The current standards and guidelines and existing Federal regulations are sufficient for resource protection. Elements of the suggested standard for excluding mineral development from large portions of watersheds serving as sources for drinking water are beyond the authority of the Forest Service and beyond the scope of the forest plan. For leasable minerals, the Forest Service would have to complete a leasing analysis before any new mineral leases could be issued on the Ashley National Forest. The leasing analysis process is used to determine which areas of the Forest should be made available for future mineral leasing and which lease stipulations would be appropriate for those areas. Any future suitability determinations for mineral leases would follow existing laws and regulations and would include a leasing analysis with review and input from Tribes, County governments, State governments, and the public.

Regarding the second suggested standard, FW-GD-WATER-01 in the revised forest plan already gives guidance that management activities in drinking water source protection areas should be consistent with applicable source water protection requirements and goals.

The suggested guideline was also considered but not incorporated because existing plan components and management approaches address the majority of the topics listed in the suggested guideline (examples include FW-GL-WATER-01 and 03, FW-DC-RMZ-02, FW-GL-RMZ-01 through 06 FW-GL-VEGTR-03, FW-DC-TRAIL-02, FW-GL-TRAIL-01 through 03, FW-GL-MINL-04, FW-DC-ROAD, 05, 07, FW-ST-ROAD-01 and 02, FW-GL-ROAD-01 through 03, FW-ST-RAREHAB-01, FW-GL-FIRE-01, 03, FW-ST-TI-01 through 04, 08, 10, FW-GL-TIMB-01, 02, FW-GL-GRAZ-01, 02, FW-GL-AIR-01, and Watershed, Aquatic, and Riparian Ecosystems management approaches 01–07). Outside of the forest plan, other elements are already addressed by existing Forest Service policy, guidance, Federal and local laws, oil and gas leasing stipulations, pesticide management plans, allotment management plans, and project-specific decisions. The 2012 Planning Rule and 2015 amendment give guidance that plan components may be used to carry out laws, regulations, or policies but should not merely repeat existing direction from laws, regulations, or directives. References to other sources are preferred (Forest Service Handbook 1909.12 chapter 22.1).

6. Ecosystem-level plan direction for water, watersheds, aquatic, and riparian areas emphasizes conservation, maintenance, and restoration of aquatic and riparian ecosystem integrity, which would help protect habitat from sediment-causing activities and restore previously damaged habitat. This would reduce the threat of fish habitat degradation and might even improve previously impaired conditions. See appendix D to the final EIS for the persistence analysis for Colorado River Cutthroat Trout, including the plan components that alleviate or eliminate key threats.

   The following monitoring questions are in the watershed- and groundwater-dependent ecosystems section the chapter 4 of the plan: MON-WATER-01: Are watersheds and water quality being maintained or moved toward desired conditions? MON-WATER-02: Are water bodies being maintained or moving toward desired conditions? MON-WATER-03: Are wetlands and riparian habitats being maintained or moving toward desired conditions? The indicators for these monitoring questions include trends in water quality and project monitoring for the implementation and effectiveness of best management practices to protect water quality. In addition, there are specific monitoring questions for fisheries and livestock grazing.

   In addition, any project that has a water depletion component is analyzed at the project level and consultation with FWS is engaged. The recovery program for the downstream endangered fishes is designed to mitigate any upstream effects as long as the effects are nominal and within the bounds set by the recovery program.

7. The intent is to improve the connectivity of channel habitats and stream networks for aquatic organisms. An example would be replacing or modifying road culverts currently preventing aquatic organism passage. Watershed, Riparian and Aquatic Ecosystems management approach 06 addresses maintaining and restoring connectivity of streams, floodplains, riparian, and wetland areas. The language of the management approach has been modified for clarity.

8. The planning team believes that all the watershed, aquatics, fisheries, and riparian management zone direction offer enough plan components to achieve the identified desired conditions for fisheries. No new plan components have been added in response to this general comment.

9. The National Forest Management Act directs the Forest Service to prepare management plans that provide for multiple uses and sustained yield of forest resources, in accordance with the Multiple-Use Sustained- Yield Act of 1960. It specifies that the national forests shall be managed for outdoor recreation, range, timber, watershed, and wildlife and fish purposes. Forest plans do not affect specific treaty rights or other valid existing rights established by statute. The forest plan has desired conditions and other guidance for watershed management to protect water quality as a headwater source for downstream use, but it does not address the administration of specific water rights. The Forest Service complies with Federal and State law in administration of water rights. The language in the draft EIS on water quality standards in Indian Country has been reviewed and modified.

10. The referenced passage in the draft EIS is intended as a general summary of the effect of special designation areas on riparian area vegetation structure and composition common between the alternatives. The suggested language regarding wildfire risk is covered elsewhere in the comparison of alternatives.

Water – Conservation Watershed Network

Letter numbers 99, 128

Issue Statements

1. The Forest Service's land use plan should put more emphasis on the kinds of projects and infrastructure needed to move watersheds in the right direction. With at least 50 watersheds functioning at risk (draft EIS, page 58), the objective of improving at least two priority watersheds over 10 years is not going to solve the problem.

Responses

1. The forest plan has an objective to improve a minimum of two focus watersheds every 10 years. Other forestwide objectives in the plan for fuels, vegetation management, roads and trails infrastructure, fisheries and aquatics, riparian areas, streams, and wetlands also contribute to watershed restoration. Appendix 3 in the forest plan contains management approaches that further describe strategies for watershed improvement. These include management approaches Watershed, Aquatic, and Riparian Ecosystems 01–07, Transportation Infrastructure 01–11, Fisheries 01–04, Trails 01–03, Recreation 02, Fire 01, and Coordinating with Tribes, Partners and Cooperators 01, 02, 07–10. Outside of plan revision, the Forest has partnered with States and other entities in the Watershed Restoration Initiative and the Shared Stewardship programs to pursue landscape multiple watershed scale projects designed to improve ecological conditions in priority areas of common interest among partners. See also the related response for Water, Aquatic, and Riparian Ecosystems issue statement 9: "The language in the objective states "at least" 2 per 10 years and does not prevent a faster pace. Nor does it prevent the intent to have more than two focus watersheds in place at any one time. Attachment A depicts three priority watersheds in place at the moment. As stated in Appendix 2 of the proposed plan, priority watersheds will change over the life of the forest plan. They are reevaluated periodically based on ecological values, restoration goals, regulatory requirements, and changes in Forest Service priorities and those of other agencies, Tribes, organizations, and interested parties." Some indicators ranking as risk elements in the Watershed Condition Framework (example presence of large dams/diversions score as departures from natural flow regimes) are beyond the Forest Service's scope/authority or contrary to the Forest Service's multiple-use mandate. Projects focus on elements which can be improved through integrated restoration efforts and partnerships.

Water – Riparian Management Zones

Letter numbers 60, 125, 126, 128

Issue Statements

1. Some commenters asked that the Forest Service reduce the width of the riparian management zones, while others suggested increasing the width of these zones. In addition, some suggested that the Forest Service should clarify how the width of the zone is measured and indicate how "no surface occupancy" is being considered.

2. Conifer encroachment in riparian areas is largely attributed to the loss of floodplain connectivity and riparian wetlands rather than to lack of wildfire. Wildfire treatments to reduce conifer encroachment should be cited or removed. Revise with new information and consult Macfarlane et al. 2016.

3. The Forest Service should add the following objective for riparian management zones: "Restore the vegetation structure and composition of at least 500 acres in riparian management zones every 5 years. Priority shall be given to zones that are at most risk from large-scale high-intensity fire, flooding events associated with climate change, or associated with streams listed as 303(d): Impaired Waters."

4. The Forest Service should identify potential conflicts through a grazing-riparian management zones crosswalk between grazing allotments and riparian area usage. The crosswalk could serve as a management tool or early warning system to protect riparian areas and water quality through adjustments to grazing levels, timing, and duration in riparian management zones.

5. Guideline FW-GL-RMZ-01 should incorporate language that the Forest Service will use an existing or any forthcoming pest management plan to select the appropriate pesticide to target specific vegetation and will ensure that the label instructions are followed. This will provide additional measures to ensure the least amount of indirect impacts on water features associated with riparian management zones.

6. The plan should explain why there is a focus on providing for "desired nonnative plant, vertebrate, and invertebrate communities" in riparian management zones and list what species these are.

7. Water resources and the values they support are of central importance to Forest management goals, water supplies, nearby communities and the people of the United States. Accordingly, the draft forest plan should prohibit construction of infrastructure associated with mineral or energy resource activities, including roads, within 50 feet of the top of the stream bank of an intermittent or ephemeral stream and prevent the construction of infrastructure associated with mineral or energy resource activities, including roads, within a zone that consists of a wetland or riparian area and the uplands within 325 feet of the margin of a wetland or riparian area. To carry out the dictates of the 2012 Planning Rule and protect Forest resources, the draft forest plan should mandate that the exploration, development, and production of mineral and energy resources be conducted in an environmentally and culturally sensitive manner to avoid, wherever possible, and otherwise minimize adverse effects on public health and safety, wildlife and wildlife habitat, soils, and air and water quality. Such an approach would serve to protect water quality from degradation, as required by State water quality standards, and would maintain and restore

watersheds and aquatic ecosystems, water resources, and riparian areas and provide ecological conditions to support the diversity of plant and animal communities.

Responses

1. The language describing default dimensions of riparian management zones has been modified for clarity. The default dimensions have been retained.

2. The language in the passage on page 77 of the draft EIS has been edited for clarity. “Restore waterbody/floodplain connectivity” has been added to the statement on aquatic habitat restoration. The Macfarlane et al. (2017) reference depicts the use of a regional-scale remote sensing LANDFIRE model of potential departure/conversion of riparian vegetation from natural conditions. The document's discussion of limitations of the model described its applicability primarily for coarse-scale assessment of riparian vegetative condition in human-affected landscapes. Other references and forest-specific sources of data were used to inform the riparian and terrestrial vegetation range of variability assessments for the Ashley (Huber 2017; Plunkett 2017). Site-specific data is considered best available science.

3. The suggested objective was considered but not adopted. These actions are covered in existing objectives and management approaches elsewhere in the draft plan (FW-OB-FISH-01 and 04, FW-OB-WATER-01 through 03, FW-OB-VEGNF-01, and Watershed, Aquatic, and Riparian Ecosystems management approaches 01–09).

4. Crosswalks are being considered and developed as aids during the rollout and implementation phase of the plan revision process but not as components or appendices of the plan itself.

5. It is policy throughout the Forest Service that Forests develop and follow pesticide management plans. A Forest’s pesticide management plan is updated independent of the timeframe followed for its forest plan revision. The current version of the Ashley National Forest’s pesticide management plan contains language requiring training, familiarity, and application according to label directions. A variety of other guidance exists in the plan to protect water resources. The 2012 Planning Rule and its 2015 amendment direct that plan components may be used to carry out laws, regulations, or policies but should not merely repeat existing direction in laws, regulations, or directives (references to these sources are preferred). Attachment B of the draft plan (now appendix C of the plan) contains watershed/aquatics management approach 03, which uses project-specific best management practices in riparian areas. These would include practices for chemical application.

6. Plan components regarding appropriate plant materials to improve, restore, and/or maintain ecological integrity, resilience, and sustainability are consistent with direction given in Forest Service plant materials policy. The use of nonnative plant materials with moderate to high resource values that are proven to compete with invasive plants but do not invade and displace neighboring resilient native communities may be considered for restoration purposes where native vegetation communities are unlikely to establish through natural regeneration or seeding of native plant materials.

   On the Ashley National Forest, degraded conditions are usually associated with the presence and abundance of invasive plants such as cheatgrass and halogeton. Plan components FW-GO-VEGTER-03 and 04 were designed to support and enhance native plant material research and production. Plan components support an integrated approach to reducing the establishment, suppressing the spread, and minimizing the impacts of noxious weeds (FW-DC-VEGTER-08;

FW-GD-VEGTER-03 and 04; FW-GO-VEGTER-01 and 02). The Forest Service does recognize the importance of native plants and has developed appropriate plan components designed to maintain or restore native plant communities within the plan unit (FW-DC-VERTER-01 through 05, FW-GD-VEGTER-01, and FW-GO-VEGTER-01). These limit the type of nonnative plants that can be used for restoration purposes.

State wildlife agencies manage for populations of desired non-native species that use aquatic and riparian zones. They do this for both consumptive and nonconsumptive users as well as for wildlife diversity. Non-native invertebrates may be considered as biological controls in invasive weed management.

7. Plan components are in place regarding roads and facilities avoiding waterbodies and riparian management zones (e.g., FW-ST-ROAD-02, FW-GL-ROAD-02 and 03, FW-GL-MINL-04, FW-GL-RMZ-04). Energy development is further regulated by existing lease stipulations, project-specific design requirements, Federal and local laws, and regulations and policies outside of plan revision.

Wilderness – Wilderness Act

Letter numbers 24, 60

Issue Statement

1. The following plan Standard should be added to address management of recommended wilderness areas: "No motorized or mechanized transport by the public shall be allowed."

2. On page 17 and 19 of the draft EIS, the Forest Service should recognize that wilderness management direction relies on natural processes, which removes many tools otherwise available to benefit terrestrial vegetation communities

Response

1. Forest plans generally do not restate law or policy. The 1984 Utah Wilderness Act, Public Law 98-428, states: "Subject to valid existing rights, each wilderness area designated by this Act shall be administered by the Secretary of Agriculture in accordance with the provisions of the Wilderness Act of 1964 (78 Stat. 892) governing areas designated by that Act as Wilderness areas." The prohibition of motorized equipment or mechanized transport is Forest Service policy for wilderness areas administered under the provisions of the 1964 Wilderness Act.

2. Wilderness is recognized as a multiple use by the Forest Service and as such includes specific restrictions to maintain the wilderness character for which the areas were designated.

Wilderness – High Uintas Wilderness Area

Letter numbers 24, 62, 90

Issue Statements

1. The Forest Service should make the following changes to the Alternatives chapter of the draft EIS:
   On page 12: "All alternatives will provide management direction in keeping with language in legislative direction for the designated High Uinta Wilderness Area (276,175 acres on the Ashley National Forest). Inventoried roadless areas (approximately 637,700 acres on the Ashley National

Forest) will be managed in accordance with relevant regulations." Pages 69 and 70 indicate that there are 274,000 acres of High Uinta Wilderness Area in the Ashley National Forest and page 158 indicates there are 276,175 acres. The Forest Service should correct this inconsistency.

2. The plan should recognize that wilderness management direction removes many tools otherwise available to benefit terrestrial vegetation communities.

Responses

1. The Forest Service has corrected the acreage of the Ashley National Forest's managed portion of the High Uintas Wilderness to the official acreage of 274,218 acres throughout the document.

2. Wilderness is recognized as a multiple use by the Forest Service and as such includes specific restrictions to maintain the wilderness character for which the areas were designated.

Wilderness – Recommended Wilderness

Letter numbers 21, 24, 25, 57, 58, 60, 113, 118, 123, 128

Issue Statements

1. The Forest Service should not further limit recreation opportunities and access to public lands under alternatives B, C, and D due to large acreages being closed off.

2. The Forest Service should clarify the discrepancies in recommended wilderness between alternative B and appendix G.

3. The following areas should be considered for recommended wilderness:

   • Alkali Canyon Wilderness Area
   • Big Brush Creek
   • Big Brush Gorge
   • Big Ridge Wilderness Area
   • Carter Creek Wilderness Inventory Area
   • Cottonwood Wilderness Inventory Area
   • Cow Hollow Wilderness Inventor
   • East Uinta
   • Flat Top Mountain
   • Goose Egg Peak
   • Goslin Wilderness Inventory Area
   • Lake Fork Mountain Wilderness Inventory Area
   • Lightning Ridge
   • Nutter's Canyon Wilderness Inventory Area
   • Pole Creek Wilderness Inventory Area
   • Queant Lake
   • Red Canyon Wilderness Unit
   • Right Fork Indian Canyon Wilderness Inventory Area
   • Sheep Creek East Wilderness Inventory
   • Timber Canyon East Wilderness Inventory Area
   • Timber Canyon West Wilderness Inventory Area
   • Wagon Road Ridge Wilderness Inventory Area
   • Wire Fence Wilderness Inventory Area

4. The Forest Service should consider analyzing or combining wilderness areas that share adjacent boundaries, biota, and key functions.

5. The Forest Service should ensure that suitable timber harvest would not be allowed in any of the recommended wilderness areas.

6. The Forest Service should not establish additional wilderness on the south slope of the Uintas as use would greatly increase.

7. The Mount Lena Wilderness Inventory Area should be separated into a northern unit (north of existing all-terrain vehicle trails) and a southern unit (south of these trails). Each of the resulting units would qualify as a wilderness area.

8. The Forest Service cannot inventory and evaluate new areas to determine their suitability for wilderness designation in this plan revision process or they will violate the Utah Wilderness Act.

Responses

1. The land management planning process requirements in Forest Service Manual 1923 and in the 2012 Planning Rule direct the Forest Service as follows: "In developing a proposed new plan or proposed plan revision the responsible office shall: (v) Identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation" (36 CFR 219.17©(2)). The Ashley National Forest conducted the Region 4 inventory and evaluation process and offered opportunities for public participation. Utilizing this information, the Forest developed a range of alternatives to analyze for effects on resources from recommended wilderness, including recreation access.

2. A modified Alternative B was developed that does not include any recommended wilderness. Appendix G has been edited to reflect this change.

3. The Ashley National Forest conducted the Region 4 inventory and evaluation process and offered public participation opportunities. Utilizing this information, the responsible officer identified and developed a range of alternatives to analyze for effects as recommended wilderness.

4. The Ashley National Forest conducted the Region 4 inventory and evaluation process and offered public participation opportunities. Utilizing this information, the responsible officer identified and developed a range of alternatives to analyze for effects as recommended wilderness.

5. Forest Service Handbook 1909.12 Chapter 70 (74.1), states that all plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. The plan includes desired conditions, standards, and guidelines to protect and maintain these characteristics, including a standard that "Timber harvest shall not be allowed."

6. The Ashley National Forest conducted the Region 4 inventory and evaluation process and offered public participation opportunities. Utilizing this information, the responsible officer identified and developed a range of alternatives to analyze for effects as recommended wilderness.

7. The Ashley National Forest conducted the Region 4 inventory and evaluation process and offered public participation opportunities. Utilizing this information, the responsible officer identified and developed a range of alternatives to analyze for effects as recommended wilderness.

8. The release language of the Utah Wilderness Act is similar to other wilderness acts of its time. The language in Title II, Sec 201(b)(2), makes it clear that while the RARE II review was sufficient for that time, the Forest Service shall be required to review the "wilderness option" during subsequent revisions of forest plans. Section 201(b)(4) also makes it clear that lands in the inventory shall be managed for "multiple use" except that those lands identified as recommended for wilderness designation through the Forest planning process may be managed to protect their wilderness suitability. Only the performance of a statewide wilderness assessment was prohibited by the Utah Wilderness Act of 1984. Individual reviews by each Forest do not violate this prohibition. The prohibition of a statewide review was intended to prevent a RARE I or RARE II-type exercise.

Wild and Scenic Rivers

Letter numbers 24, 62, 75, 93, 128

Issue Statements

1. The Forest Service should clarify why it is proposing to include the four eligible segments that were not determined to be suitable for Wild and Scenic River in the preliminary suitability determination under alternative C.

2. The draft EIS wrongly states that the 2012 Forest Planning Rule allows or requires a Wild and Scenic River suitability analysis. The Forest Service should clarify and rectify this.

3. The Forest Service is required to protect rivers found eligible (through a planning process) as well as those found suitable (e.g., Congressionally recommended study rivers).

4. The four streams newly found eligible in the draft EIS (Dowd Creek, Honslinger Creek, North Skull Creek, and Spring Creek) should remain protected as eligible streams in the final forest plan. The Forest's finding of these four streams to be not suitable was premature was based on a narrow set of factors. The Forest Service should include other evidence provided for suitability, including:

   1. Dowd Creek—3.1 miles; Classification Recreational/Scenic; outstandingly remarkable values: Cultural, Wildlife, Climate Adaptation.

   2. Honslinger Creek—2.3 miles; Classification Recreational; outstandingly remarkable values: Cultural, Wildlife, Climate Adaptation

   3. North Skull Creek—1.8 miles; Classification Wild; outstandingly remarkable values: Cultural, Wildlife, Climate Adaptation

   4. Spring Creek 2—6.8 miles; Classification Recreational/Scenic; outstandingly remarkable values: Cultural, Climate Adaptation

   The four eligible streams are uniquely located and intact and provide broad migration corridors and opportunities for climate adaptation. Correspondingly, additional consideration should be given to the potential eligibility and suitability of headwaters streams and other higher-elevation portions of streams to anticipate and accommodate those upward-moving adaptations of sensitive species, as one primary function of Wild and Scenic protections is the maintenance of connectivity.

5. The Forest Service should find the 28 rivers and streams that the Forest has found eligible in recent years to be still eligible.

6. The Forest Service should finalize its eligibility report before performing a suitability determination on streams found to be eligible or it will violate the law.

7. Eleven stream segments meet the Wild and Scenic River eligibility qualifications. Unless analyzed and documented as not eligible by the Forest, these segments should be found eligible and should be correspondingly subject to protective management prescriptions under the forest plan. The Forest Service must analyze, document, and publish its finding for all 11 rivers, as required by law. These segments are:

   1. East Fork Farm Creek—3 miles; Classification Wild; OPV: Wildlife

   2. 2. East Fork White Rocks River—Additional outstandingly remarkable value Proposed (Wildlife) – 3 miles; Classification Scenic; outstandingly remarkable values: Wildlife, Scenic

   3. Farm Creek—3 miles; Classification Wild; outstandingly remarkable value: Wildlife

   4. Fivemile Creek—5 miles; Classification Wild; outstandingly remarkable values: Ecological, Botany

   5. K P Creek—3 miles; Classification Wild; outstandingly remarkable values: Ecological, Botany, Wildlife

   6. Minnie Creek—2 miles; Classification Scenic; outstandingly remarkable values: Ecological, Botany, Wildlife

   7. Mosby Creek—5 miles; Classification Scenic; outstandingly remarkable values: Ecological, Wildlife

   8. Poison Creek—2 miles; Classification Wild; outstandingly remarkable values: Ecological, Wildlife

   9. Reynolds Creek—3 miles; Classification Scenic; outstandingly remarkable values: Fish, Wildlife, Ecological, Botany

   10. Sixmile Creek—6 miles; Classification Wild; outstandingly remarkable values: Botany, Wildlife

   11. Spring Creek 1—3 miles; Classification Scenic; outstandingly remarkable values: Ecological, Botany

8. The Forest Service should replace the term “temporary classification” with “recommended designation” on page 5 of the draft EIS since only Congress has the authority to “classify” lands or waters as wilderness or wild and scenic rivers.

9. The Forest Service should work with Native American Tribes regarding potential sacred sites, cultural values, and indigenous knowledge pertaining to the management of Wild and Scenic eligible streams under the Wild and Scenic River Act, particularly as they relate to potential documented Cultural outstandingly remarkable values in each potentially eligible stream reach.

Collaboration with the Ute Indian Tribe and other Forest-associated Tribes should be documented in both the draft forest plan and draft EIS, as well as the final forest plan and final EIS.

10. Dowd Creek, Honslinger Creek, Spring Creek, and North Skull Creek do not meet the "free flowing" or "outstandingly remarkable" requirements under the Wild and Scenic River Act.

11. Page 73 of the draft EIS states that "In turn, 1,670 acres of riparian vegetation communities, 1,000 acres of wetland vegetation, and 960 acres of possible or likely fens would receive increased protection through designation of these river corridors (table 3-9)." The 42 miles of the Uinta River tributaries suitable for Wild and Scenic River designation are within the High Uintas Wilderness Area, so Wild and Scenic River designation doesn't provide increased protection; the protection against management activities, such as timber harvest, is already in place. Multiple layers of special designations within wilderness are not necessary.

Responses

1. The Forest Service completed the draft wild and scenic rivers eligibility study and report in May 2019. The four eligible segments were included in alternative C to ensure a full range of alternatives was considered. The four segments were identified to be eligible with cultural outstandingly remarkable values. The Forest Service completed a wild and scenic river suitability study in 2021. Even though the segments were found to not be suitable, they remained in alternative C, again to ensure analysis of the full range of alternatives.

2. Suitability for eligible segments can be determined in a plan revision process. The benefit to conducting the analysis with the revision process is due to the updated plan direction that sets forth the desired conditions across the plan area and is developed with consideration of integrated resource management. The 2012 Planning Rule at 219.10 (b)(v) includes the following language: "Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the national Wild and Scenic River system." The Forest Service Handbook has more detailed direction related to this: "Any eligible river may be studied for its suitability for inclusion in the National System at any time. Rivers may be studied for suitability as part of a plan development or revision" (FSH 1909.12, chapter 83). There is a benefit to conducting the analysis with the revision process, because the forest plan sets forth the desired conditions across the plan area and is developed with consideration of integrated resource management, it is preferable to conduct the analysis for suitability within the broader picture that comes with the revision analysis

3. The forest plan includes interim management direction for the Forest Service-identified eligible and suitable rivers or segments, including the plan component standards or guidelines identified in Forest Service Handbook 1909.12, chapter 80. Note that "A river determined through a suitability study to be not suitable shall no longer be considered eligible and interim protection measures no longer need to be applied to those rivers" (FSH 1909.12, chapter 84.3).

4. The wild and scenic river eligibility study followed direction in the FSH 1909.12 chapter 82.73a. Section 1(b) of the Wild and Scenic Rivers Act establishes categories of outstandingly remarkable values. Although the criteria within each category may be modified and additional criteria may be included to make them more meaningful in the region of comparison, the Ashley did not include additional categories such as those suggested by the commenter of migration corridors and opportunities for climate adaptation. The established criteria within the categories were utilized. The revised plan addresses climate change vulnerability and adaptation more broadly.

Refer to appendix F for the wild and scenic river suitability study which followed the direction in Forest Service Handbook 1909.12, chapter 80, 83.2, Objective of the Suitability Study, and 83.21, Criteria for Determining Suitability. It was determined that management of the cultural resources using other Federal laws was appropriate for the protection of the identified outstandingly remarkable value in the absence of other outstandingly remarkable values along the segments. Under the National Historic Preservation Act, and in consultation with the tribes, the Forest Service is adequately able to provide for protection of the cultural or historic resources.

5. Forest Service staff used the Ashley National Forest eligibility determination and the 2008 suitability studies (Forest Service 2005b, Final Eligibility Determination of Wild and Scenic Rivers; Forest Service 2008, Wild and Scenic River Suitability Study for National Forest System Lands in Utah) when developing the revised forest plan. The river segments previously evaluated for eligibility in 2005 and suitability in 2008 were not reevaluated as part of the forest plan revision process. Neither the commenters nor the Forest Service have identified changed circumstances that have affected the outstandingly remarkable values. If changed conditions warrant review of a past suitability determination, the responsible official can choose to restudy. Although we did not find changed circumstances to warrant restudy of the segments found not suitable in 2008, those streams could be restudied in the future based on changed circumstances.

6. The Forest Service released the Final Wild and Scenic River Eligibility Report[4] (Forest Service 2022b) in December 2022. In addition, an erratum to the draft eligibility report and summary responses to comments submitted on the draft report was released in December 2022 (Forest Service 2022c).

7. The Forest Service studied the named river and stream segments by mapping watercourses at the 5th Level Hydrologic Unit scale to a scale of 1:100,000 for eligibility in the 2005 Ashley National Forest Eligibility Determination Rivers. The 2012 planning rule required any named segment on a standard US Geological Survey (USGS) 7.5-minute quadrangle map to be studied for eligibility. The Forest Service compared what was studied for eligibility in 2005 to the named segments on USGS 7.5-minute quad maps and 40 segments were identified that were not studied in 2005. Of these 40 segments four were identified to have an outstandingly remarkable values (ORVs) of cultural. The other 36 segments were not found to have any ORVs that are not rare, unique, or exemplary with respect to the region of comparison (Forest Service 2005b). The river segments previously evaluated for eligibility in 2005 and suitability in 2008 were not reevaluated as part of the forest plan revision process due to limited changed circumstances.

8. The wording "temporary classification" was removed from chapter 1, which now reads: Forest Service-identified eligible and suitable rivers or segments and recommended wilderness areas do not guarantee formal designation..." The planning rule at 36 CFR 219.10 provides for interim management of Forest Service eligible or suitable rivers or segments, to protect their values prior to a congressional decision whether to designate them as part of the National Wild and Scenic River System. This includes required plan components, including standards and guidelines, to provide for "protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system."

9. The Ute Indian Tribe has been participating in the forest plan revision process, including identifying areas of tribal importance on the Ashley National Forest and opportunities for

[4] The reports are available at: https://www.fs.usda.gov/detail/ashley/landmanagement/planning/?cid=fseprd546973

working together and providing input to the Forest Service plan revision documents. The Ashley National Forest will continue to work closely with the Ute Indian Tribe on management of resources in areas of tribal importance. One of the outstandingly remarkable values that is assessed for wild and scenic river eligibility is historic and cultural values—the important evidence of historic or prehistoric occupation or use by humans. Sites may have national or regional importance for interpreting history or prehistory. As stated in the Wild and Scenic Rivers Suitability Report:

> The principal federal law addressing cultural resources is the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC Section 470), and its implementing regulations (36 Code of Federal Regulations [CFR] 800). These regulations, commonly referred to as the Section 106 process, describe the procedures for identifying and evaluating historic properties, for assessing the effects of federal actions on historic properties, and for project proponents consulting with appropriate agencies to avoid, reduce, or minimize adverse effects.

For additional information related to the historic and cultural outstanding remarkable values of eligible wild and scenic rivers, refer to the final Wild and Scenic River Eligibility Report (Forest Service 2022b).

10. "Free flowing" is defined in Forest Service Handbook 1909.12, chapter 80, as

> any river or section of a river means existing or flowing in a natural condition without impoundment, diversion, straightening, riprapping, or other modification of the waterway. The existence, however, of low dams, diversion works, or other minor structures at the time any river is proposed for inclusion in the [National System] shall not automatically bar its consideration for such inclusion: Provided, that this shall not be construed to authorize, intend, or encourage future construction of such structures within components of the [National System].

Additionally, Forest Service Handbook 1909.12, chapter 80, 80.72, states, "There are no specific requirements for minimum flows or for temporal or spatial continuity of flows for an eligible segment. Flows are considered sufficient for eligibility if they sustain or complement the outstandingly remarkable values for which the river would be designated."

11. The Wild and Scenic River suitability of the Upper Uinta River within the High Uintas Wilderness was identified in the 2008 National Forests of Utah Wild and Scenic River suitability study (Forest Service 2008).

Wildlife and Plants

Letter numbers 11, 24, 60, 62, 64, 74, 123, 126, 128

Issue Statements

1. More focus should be placed on the positive impacts good grazing practices have on vegetation and wildlife habitat. The forest plan should identify land health standards as well as where specific benchmark improvements at the permit level have not worked in order to avoid the same mistakes in the future. The Forest Service should additionally review the forest plan for any statements that may be biased towards assuming that overgrazing is currently occurring on the Forest since the draft EIS states that rangelands are in good condition.

2. Known migration corridors, connectivity corridors, and seasonal habitats should be prioritized for both big game and other species that rely on them, and the Forest Service should include specific plan components to address and sustain connectivity. Wherever possible, the Forest Service should remove obstructions to connectivity to restore habitat function. The Forest Service should also prioritize and restore other year-round big game habitat.

3. Unplanned ignitions have the potential to produce serious impacts on wildlife and at-risk species, including invasive species replacing native plants, loss of soil, increased runoff, and harm to water quality.

4. The draft EIS should include species guidelines for all present at-risk species and federally listed species, as well as standards to restore ecosystem integrity. There is no follow-through for the desired conditions and objectives, and the entire wildlife section lacks standards.

5. The Forest Service should take a fine-filter as opposed to coarse-filter approach and develop species-specific plan components. Efforts should be made to maintain and establish conditions that the native species have evolved in. There should also be reference to historic climax plant communities. The Forest Service should address the maintenance of the diversity of native plant and animal communities that occur within its boundaries. Threats to individual at-risk species should be addressed in this section. The Forest Service should include a table that shows at-risk plant species, landtype associations, and threats, followed by an analysis of the alternatives and their effects.

6. The invasive/nonnative section focuses on higher-priority species like cheatgrass and tamarisk rather than encroaching conifers. The vague wording regarding damage or adverse effects to endemic species should be improved. The draft EIS should include further protection of endemic species since disturbances that do not destroy a population could have detrimental and long-lasting effects, resulting in the population being unable to recover from other potential impacts, particularly unintended ones.

7. The list of species of conservation concern should be reevaluated to include relevant pollinators such as the western bumblebee, monarch butterfly, and broad-tailed hummingbird. This section is inconsistent with appendix C and the draft plan.

8. The Forest Service should remove the following statement because it lacks information and analysis on habitat overlap with domestic livestock (chapter 3, page 161, Effects from Grazing section): “Deer may avoid sites with high cattle utilization (Collins and Urness 1983), and reproductive success may be lower in areas with high cattle stocking rates (Smith 1984). In addition to habitat alterations, domestic livestock grazing can have adverse effects on bighorn sheep populations by increasing competition for space and forage.”

9. Predation should be added as a stressor in the analysis assumptions.

10. With forage utilization and stubble height determined based on land health standards, this should not translate to reduced habitat features, provided that Forest Service range managers are accurately assessing land/range health.

11. The species narratives should be revisited as they do not have a rational organization.

12. The wildlife groups are not consistent between each vegetation type in table 3-31. Note the specific examples of rodents being highlighted in some vegetation communities when they can be

found in all communities except for water; also, beavers are highlighted in deciduous forest but not riparian. Additionally, water should be removed as a vegetation type.

13. The Forest Service should remove the word "known" from the following guideline as it implies that it only refers to currently known nests and does not require surveys to find new sites: "03 Vegetation treatments should avoid removal of known raptor nests, and should avoid, minimize, or mitigate disturbance around known active nests. An active nest site is defined as a nest occupied by nesting raptors."

14. The following desired conditions should be added:

    - "Sustainable populations of native and desirable nonnative plant and animal species are supported by healthy ecosystems, essential ecological processes, and land stewardship activities and reflect the diversity, quantity, quality, and capability of natural habitats."

    - "Land management activities are designed to maintain or enhance sustainable populations of both common and uncommon species and consider the relationship of threats (including site-specific threats) to species survival."

    - "The Ashley National Forest provides for high-quality hunting, fishing, and wildlife-watching opportunities."

    - "Both nonmotorized and motorized use is managed to respect ecological systems, including wildlife, and different user groups."

    - "Roads allow for safe and healthy wildlife movement throughout the Forest. Vehicular collisions with wildlife are minimized and rare."

15. The Forest Service should revise "03 Vegetation treatments should avoid removal of known raptor nests, and should avoid, minimize, or mitigate disturbance around known active nests. An active nest site is defined as a nest occupied by nesting raptors" to "03 Vegetation treatments avoid removal of raptor nests, and should avoid, minimize, or mitigate disturbance around known active nests. An active nest site is defined as a nest occupied by nesting raptors."

16. The Forest Service should alter the description of lynx habitat to resolve the apparent inconsistency between text on pages 171 and 173, as noted below:

    Page 171: "Included are 9,000 acres of general Rocky Mountain bighorn sheep habitat, 17,500 acres of Rocky Mountain bighorn sheep CHHR [core herd home range], 3,000 acres of greater sage-grouse habitat, 9,100 acres of lynx peripheral habitat . . ."

    Page 173: "Because fewer acres of Rocky Mountain bighorn sheep, lynx, and fringed myotis habitat would be suitable for timber production relative to Alternative A, these species would experience reduced impacts from tree removal. The benefit to at-risk species, whose habitat is threatened by conifer encroachment (Rocky Mountain bighorn sheep), from fewer acres of habitat suitable for timber production, would be less relative to alternative B."

17. Specific objectives and standards should be added for the at-risk plant species.

18. The Forest Service should consult the best available science for streambank alteration impacts, sensitive amphibian species habitat needs, and herbaceous vegetation management for wildlife needs.

19. The following edit should be made in chapter 2: "Management under alternative B would also support the maintenance and improvement of resilient ecosystems and watersheds to support wildlife diversity; it would provide ecological conditions to maintain a viable population of each species of conservation concern and common and abundant species within the plan area."

Responses

1. The general statements in the analysis about grazing are correct and merely discuss the possible effects to wildlife if grazing is not managed appropriately and overgrazing occurs. The discussion of livestock grazing's effects to wildlife under the action alternatives address how plan components would avoid overgrazing from occurring.

2. In the Management Approach section of the draft plan (now appendix 3 of the plan), a management approach for wildlife discussed the consideration of beneficial and adverse impacts from management activities on migration corridors. This approach has been changed to a guideline (FW-GD-WILDL-15) and focuses on evaluating effects from management activities to migrating ungulates and connective habitat and mitigating activities to lessen impacts to migrating ungulates. This guideline will help identify the potential impacts to migrating wildlife and connective habitat and lessen those impacts from ground-disturbing activities, which would include future proposed roads. An analysis of motorized roads, road density, and the potential effects on wildlife on the Forest was completed for the Forest's motorized travel plan (Forest Service 2009). The revised forest plan provides strategic guidance; no decisions will be made regarding the regulation of public activities and access to Federal lands or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The desired conditions, standards and guidelines mentioned previously will maintain vegetation and habitat for migrating species. Thus, the connectivity for habitat needed for wildlife species movements will be maintained.

   Also, in the Management Approach section of the plan, there is a management approach for the design of fences to allow wildlife to cross them more easily, thus avoiding the potential of new barriers to wildlife during migration from new fences. Additionally, a goal in the Wildlife section of the plan is to coordinate the management of wildlife, their habitat, and management actions with the States and other local agencies. Thus, a mechanism will be in place to coordinate with the states regarding migration corridors and migrating wildlife.

3. It is true that unplanned ignitions, if not managed, can have detrimental effects to wildlife for the short term and the long term. However, it is also true that unplanned ignitions that are managed appropriately may have short-term adverse effects on wildlife but have long-term beneficial impacts.

4. In the forest plan, appendix E is a crosswalk that lists all relevant plan components for at-risk species, including plants. Plan components were developed to address the need for change identified during the assessment phase of the forest plan revision. The assessment described natural range of variation and existing condition with current trends and identified the departures from natural range of variation. The 2012 Planning Rule states that developed plan components must "provide the ecological conditions necessary to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain viable population of each species of conservation concern within the plan area."

Plan components contain elements that address ecological integrity, ecosystem diversity and sustainability, and persistence of at-risk species. These plan components, plus the many others listed in appendix E of the plan, are deemed sufficient to maintain or restore ecological integrity of at-risk species habitat. Also, additional specific standards, guidelines, desired conditions, objectives, and goals were not identified or proposed internally or by the public during the preparation of the draft EIS. As stated in the Wildlife section of the plan, many of the standards and guidelines pertaining to wildlife (including the black rosy-finch) and the desired conditions for wildlife are found in other sections of the plan (terrestrial vegetation—forested and non-forested, geologic resources and hazards, soils, watershed, aquatic, and riparian ecosystems). Desired conditions for habitat are also contained within these other sections. Where there is a specific species need that the desired conditions, standards, and guidelines in these other sections do not address, then a guideline was added in the Wildlife section to address that need.

Standards are not required to be in every resource section but rather are in the plan if a hard constraint is needed to achieve a desired condition. Guidelines 01 and 02 and desired condition 05 in the Aquatics section speak specifically to Colorado River cutthroat trout. Appendix E of the plan provides a crosswalk of plan components that maintain habitat and address threats for each at-risk species. The Ashley National Forest lacks the habitat for yellow-billed cuckoo and therefore does not address this species specifically. Refer to the biological assessment.

5. The vegetation-related sections in the plan contain desired conditions for each vegetation type. Maintaining these desired conditions will provide the diversity of habitats for native species. As stated in the wildlife section of the forest plan, many of the standards and guidelines pertaining to wildlife and the desired conditions for wildlife are found in other sections of the plan (terrestrial vegetation—forested and non-forested, geologic resources and hazards, soils, watershed, aquatic, and riparian ecosystems). Desired conditions for habitat are also contained within these other sections. Where there is a specific species need that the desired conditions, standards, and guidelines in these other sections do not address, then a guideline was added in the Wildlife section to address that need.

   There are no amphibians designated or proposed as threatened, endangered, proposed, or candidate or species of conservation concern. Therefore, fine-filter plan components are not necessary. Appendix E of the draft plan provides a crosswalk of plan components that maintain habitat and address threats for each at-risk species.

   Elements within desired condition components for terrestrial vegetation focus on maintaining or restoring ecological integrity, function, and resilience. One of the keys to maintaining ecological integrity is to conserve soil resources by limiting erosion rates to at or near inherent levels. Vegetation composition and total effective ground cover are principal elements in maintaining or restoring desired condition. Plants of moderate to high resource value are those that have moderate to high root capacity of holding soil together and/or aerial and ground protection from raindrop splash and other soil-disturbing events. The Forest Service has rated most if not all plants found on the Ashley National Forest for their ability to arrest erosion and protect watersheds (Forest Service Handbook 2209 1993; Forest Service 2005a). Nearly all if not all plants that dominate either late seral plants in communities with fire histories or are at a steady state because community changing disturbances are quite rare are rated moderate to high for resource value.

   Chapter 2, page 12 of the draft EIS provides a list of elements that are common to all alternatives. To adhere to the requirements of 36 CFR 219.1(b), certain elements were designed to be in

common to all alternatives. These include to "use a common list of species of conservation concern (SCC). The species of conservation concern were selected based on regional guidance and recommendations from forest and State agency specialists" and to "provide appropriate habitat to support species' viability ."

Chapter 2, page 13 of the draft EIS provides a list of elements that are in common to alternatives B, C, and D. These include "Plan components provide for the ecological conditions to maintain a viable population of each species of conservation concern (SCC) within the plan area. The Regional Forester identified the SCC, based on the Forest Supervisor's recommendation; consideration of public and State agency comment; and Forest Service evaluations, using regional and national guidance." No species of conservation concern were identified under alternative A, which represents the current forest plan.

In summary, the analysis of alternatives is the same between the alternatives for elements related to at-risk species. Additional analysis is not required and is not carried through in the draft EIS. The draft EIS does provide a summary of the in-depth analysis of at-risk plant species that occurred during the assessment phase of the forest plan revision. This is more fully summarized in appendix C of the draft EIS, which includes information regarding State and Federal status, habitat description and condition, species population and distribution, stressors and drivers, and sustainability of at-risk species. No modification has been made in response to this issue statement.

The literature referenced by the commenters was reviewed, but it did not provide any new information other than what was already considered in developing plan components for the forest plan.

6. The words "and Conifer Encroachment" has been added to the title "Nonnative, Invasive Species." Appendix D in the final EIS provides information on the plan components that will maintain habitat and conditions for the persistence of endemic species. On page 154 of the draft EIS, the first part of the sentence in the assumptions, "As long as small or endemic populations are not destroyed," has been deleted.

7. Appendix C came from the Species at Risk Report (Abeyta et al. 2017) that was prepared for the Ashley National Forest's assessment of ecological conditions. The Eureka mountainsnail was added as a proposed species of conservation concern after these two documents were written. This species has been added to appendix C. Colorado River cutthroat trout is listed in appendix C in the appropriate places. The broad-tailed hummingbird did not meet the coarse-filter criteria for species of conservation concern and thus was not on the list from the Regional Office for the Ashley to consider. The status of the broad-tailed humming bird has not changed since then, and it does not merit being on the list of species of conservation concern. The monarch butterfly and the western bumble bee were re-evaluated, but neither species met the criteria for species of conservation concern. Regardless, plan components will maintain habitat for pollinators, including the monarch butterfly, western bumblebee and the broad-tailed hummingbird. Refer to the pollinator table in the Persistence Analysis (Appendix D).

8. The statement regarding lower reproductive success of deer has been modified. The part of the sentence about lower reproductive success has been removed, and the citations have been replaced with a 2019 citation from UDWR. There is some overlap of bighorn sheep with domestic sheep allotments on the Ashley National Forest, and the plan mentions continuing collaboration of the Forest Service with the State of Utah to minimize the issues related to that

overlap. There are also guidelines for actions to provide separation of the two species when a permit is waived without preference. See the goals and guidelines for bighorn sheep in the wildlife section of the plan and the discussion of bighorn sheep in the Persistence Analysis (appendix D).

9. Adding predation as a stressor is not appropriate in the assumptions section on page 154 of the draft EIS. However, this concept has been mentioned as a stressor to wildlife. The control of predators is a State issue. As such, the forest plan and the EIS analysis focus on ecosystem-level plan components to provide for the broad ecological conditions that support species persistence.

10. This sentence has been modified to say: "If greater forage utilization and lower stubble height were generally used under this alternative, this could translate to reduced habitat features such as forage and cover."

11. This section has been modified for clarification. The terrestrial section is similar to the aquatic section as it does discuss terrestrial wildlife in general and has a species narrative for the general wildlife group big game. Clarification was added to refer to the Persistence Analysis (appendix D) for a discussion of all at-risk species.

12. The list of groups in each habitat type in table 3-31 are not meant to be comprehensive but rather are there to give the reader a general idea of types of wildlife that may be in that habitat type. Beaver was added to the riparian habitat type. Water is a habitat type (aquatic habitat). The table has been renamed to include that clarification.

13. If a raptor nest is known, then this guideline applies. If a raptor nest is found during surveys, then it is also "known" and this guideline would also apply. The guideline was modified to include raptor nests found during surveys.

14. The vegetation sections in the plan contain desired conditions for each vegetation type. Maintaining these desired conditions will provide the diversity of habitats for native species as well as for desired non-native species. The habitats will thus be maintained for hunted species, fish species, and watchable wildlife species. The quality of hunting and populations of hunted and fished species is largely controlled by the States under their various hunting and fishing regulations and strategies. As stated in the Wildlife section of the forest plan, many of the standards and guidelines pertaining to wildlife and the desired conditions for wildlife are found in other sections of the plan (terrestrial vegetation—forested and non-forested, geologic resources and hazards, soils, watershed, aquatic, and riparian ecosystems). Desired conditions for habitat are also contained within these other sections. Where there is a specific species need that the desired conditions, standards, and guidelines in these other sections do not address, then a guideline was added in the wildlife section to address that need. Desired conditions 02 and 06, standard 02, and guidelines 02 and 03 in the Transportation and Roads section will minimize or avoid impacts to fish and wildlife and associated ecological processes from roads. Refer to these desired conditions and standard and the guidelines.

    In the Management Approach section of the draft plan (now appendix 3 of the plan), a management approach for wildlife discussed the consideration of beneficial and adverse impacts from management activities on migration corridors. This approach has been changed to a guideline (FW-GD-WILDL-15). This guideline will help identify the potential impacts to migrating wildlife, connective habitats, and wildlife migration routes and potential design criteria to minimize impacts to these areas from ground-disturbing activities, which would include future

proposed roads. An analysis of motorized roads, road density, and the potential effects on wildlife on the Forest was completed for the Forest's motorized travel plan (Forest Service 2009). The revised forest plan provides strategic guidance; no decisions will be made regarding the regulation of public activities and access to Federal lands or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212).

15. This is a guideline, and thus the word "should" is used appropriately in this guideline.

16. Rocky Mountain bighorn sheep should not be included in this first sentence. This species has been deleted from this sentence. The word "peripheral" has been added to lynx habitat in the sentence describing the habitat acres in table 3-41.

17. In the final EIS, appendix D contains a crosswalk that lists all relevant plan components for at-risk species, including plants. Plan components were developed to address the need for change identified during the assessment phase of the forest plan revision. The assessment described natural range of variation and existing condition with current trends and identified the departures from natural range of variation. The 2012 Planning Rule states that developed plan components must "provide the ecological conditions necessary to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain viable population of each species of conservation concern within the plan area."

    Regarding at-risk species, plan components contain elements that address ecological integrity, ecosystem diversity and sustainability, and persistence. For example, FW-DC-VEGNF-01 includes benchmarks for vegetation composition, plant species richness, invasive species, conifer encroachment, and total effective ground cover, which are important ecological attributes to ensure persistence of at-risk species in non-forest vegetation communities. FW-OB-VEGNF-01 initiates action regarding non-forest vegetation communities where ecological integrity has been compromised, which would include at-risk species habitat. These two plan components, plus the many others listed in the forest plan, are deemed sufficient to maintain or restore ecological integrity of at-risk species habitat. Also, additional specific standards, guidelines, desired conditions, objectives, and goals were not identified or proposed internally or by the public during the preparation of the draft EIS. No modification has been made based on this issue statement.

18. The desired conditions, standards, and guidelines that are associated with wildlife are based on the best available science. For wildlife, these desired conditions, standards, and guidelines are largely contained in other resource sections of the forest plan. As stated in the wildlife section of the plan, many of the standards and guidelines pertaining to wildlife and the desired conditions for wildlife are found in other sections of the plan (terrestrial vegetation—forested and non-forested, geologic resources and hazards, soils, watershed, aquatic, and riparian ecosystems). Desired conditions for habitat are also found in these other sections. Where there is a specific species need that the desired conditions, standards, and guidelines in these other sections do not address, then a guideline was added in the wildlife section to address that need. The provided attachments have been reviewed, and no edits to the forest plan or final EIS were made based on this review.

19. The suggested change to the sentence on page 18 of the draft EIS has been made.

Wildlife – Aquatic Species

Letter numbers 74, 123

Issue Statement

1. The analysis should recognize that vehicle disturbance within streams can negatively impact amphibian reproduction.

2. The Forest Service should correct common and scientific names. Chapter 3, page 150: "The western chorus frog (Pseudacris triseriata) . . . is inactive, and it takes cover underwater or in damp burrows (UDWR 2020f)."

Responses

1. We agree that vehicle disturbance could negatively impact amphibian reproduction if vehicle use is not properly managed and utilized. The final EIS has been modified to identify this potential impact.

2. The suggested changes to scientific names have been made.

Wildlife – Terrestrial Species

Letter numbers 18, 24, 25, 60, 62, 64, 74, 101, 123

Issue Statements

1. Elements of the 2012 Planning Rule support the conservation and restoration not only of the plan area but within the broader landscape as well. Broader landscape considerations include

   - migration corridors

   - efforts to limit human disturbance to habitat

   - examination of roads that cause habitat fragmentation and allow for habitats to overlap in situations where it otherwise wouldn't be possible (these roads can also obstruct migration corridors)

   - in-depth habitat assessments to determine locations of existing raptor nesting sites.

2. The Forest Service should reduce grazing numbers and season or closures of pastures and allotments to limit the impact on northern goshawk habitat.

3. The Forest Service should give special consideration and make additions to the plan for further habitat consideration for the following species: midget faded rattlesnake, Mexican spotted owl, yellow-billed cuckoo, bald eagle, boreal owl, flammulated owl, great gray owl, northern goshawk, monarch butterfly, pinyon jay, and greater sage-grouse. Western (boreal) toads should also be included if they occur on the Ashley National Forest.

4. The Forest Service should address concerns over Ute ladies'-tresses in a vegetation-specific section to give it more focus.

5. Elk should be included as an important species, and their habitat should be included in the plan. Elk and many other wildlife species are sensitive to human travel patterns, especially motorized

use. Desired conditions, goals, and/or guidelines that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and nonmotorized traffic) should be included in the plan. Timing restrictions should be based on the best available science as well as site-specific factors (topography, available habitat, etc.).

6. The Wyoming Game and Fish department should be included in the following section because they manage elk in the portion of Ashley National Forest that extends into Wyoming:

   - Chapter 3, page 146, Big Game: "Elk numbers have increased significantly over the last 30 years. An upward trend in the elk population is predicted for the next plan period (Forest Service 2017a), but ultimately trends for all big game species will depend on big game management by the Utah Division of Wildlife Resources (UDWR)." Suggested change: "Elk numbers have increased significantly over the last 30 years. An upward trend in the elk population is predicted for the next plan period (Forest Service 2017a), but ultimately trends for all big game species will depend on big game management by the Utah Division of Wildlife Resources (UDWR) and the Wyoming Game and Fish Department (WGFD)."

7. The Forest Service should make the following change to this statement about greater sage-grouse:

   - Ch. 3, Pages 147-148, Greater sage-grouse: "Although there are many locations of greater sage-grouse on the Ashley National Forest, greater sage-grouse occurs at relatively low numbers on the Ashley National Forest when compared with other areas of its range (Forest Service 2017a). Sage-grouse habitat on the Ashley National Forest only support about 10 percent of the sage-grouse population in the Uinta Basin." Suggested change: "Sage-grouse habitat on the Ashley National Forest support approximately 10 percent of the sage-grouse population in the Uinta Basin in Utah. Approximately 13 percent (184,400 acres) of the Ashley National Forest is designated as either priority or general greater sage-grouse habitat (Table 3-33)." This section misrepresents the contribution of the Ashley National Forest, and specifically the Flaming Gorge National Recreation Area, to regional sage-grouse habitat. The entire Flaming Gorge National Recreation Area is either sage-grouse priority habitat (PHMA) or general habitat (GHMA), which should not be downplayed.

8. The big game section should include mountain goats and their location and distribution in relation to bighorn sheep.

9. The reptiles paragraph should be separated into snakes and lizards as well as confirming whether additional lizard species occur in the Utah portion of the Ashley National Forest.

   - "Reptile species native to the planning unit include the midget faded rattlesnake (Crotalus oreganus concolor), terrestrial garter snake (Thamnophis elegans), smooth green snake (Opheodrys vernalis), and rubber boa (Charina bottae). The terrestrial garter snake, smooth green snake, and rubber boa may be found in or near aquatic areas, such as moist meadows and along streams (UDWR 2020i, 2020j, 2020k)." Suggested change: "Snake species native to the planning unit include the midget faded rattlesnake (Crotalus oreganus concolor), terrestrial garter snake (Thamnophis elegans), smooth green snake (Opheodrys vernalis), rubber boa (Charina bottae), and Great Basin Gopher snake (Pituophis catenifer deserticola). The terrestrial garter snake, smooth green snake, and rubber boa may be found in or near aquatic areas, such as moist meadows and along streams (UDWR 2020i, 2020j, 2020k). Midget faded rattlesnakes and Great Basin gophersnakes are associated with rock outcrops and the

sagebrush community surrounding the Flaming Gorge National Recreation Area. Lizard species native to the Ashley National Forest include the greater short-horned lizard (Phrynosoma hernandesi), northern tree lizard (Urosaurus ornatus 171right), plateau fence lizard (Sceloporus tristichus), and northern sagebrush lizard (Sceloporus graciosus). Plateau fence lizards and northern tree lizards are strongly associated with rock outcrops in the sagebrush and shrubland communities in the region."

10. Wildfire, whether natural or human-caused, should be considered one of the major impacts on greater sage-grouse habitat.

11. Additional references should be cited for adaptive management and elk management:

    - Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasions of noxious weeds, lack of dependable water sources, and many others. The use of the past 25+ years of research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat (Quigley and Wisdom 2015) is helpful. More recent research on ungulate migration (Sawyer et al. 2013, Middleton et al. 2013), nutrition (Cook et al. 2013, Wisdom et al. 2018), and elk security (Ranglack et al. 2017; Wisdom et al. 2018) continue to build on this foundation. Recent research on the benefits of actively managed landscapes and relevant components of Executive Order 13855 on active management on America's forests (2018) should be incorporated into the plan.

12. Bald eagles and golden eagles should be added to the species assessments. The Forest Service should also use the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances (Romin and Muck 2002) to provide consistent application of raptor protection measures statewide and provide compliance with environmental laws regarding raptor protection. Raptor survey and conservation measures are provided in the guidelines to ensure that proposed projects under the plan avoid adverse effects to raptors, including bald and golden eagles.

13. The Forest Service should incorporate conservation measures from the U.S. Fish and Wildlife Service's 2012 recovery plan for the Mexican spotted owl:

    - Survey any area that could be occupied by nesting spotted owls using the established survey protocol (USFWS 2012, appendix D) before implementing any management action that will alter habitat structure or influence owl behavior;

    - Maintain and enhance existing nesting/roosting habitat for Mexican spotted owl through the establishment and conservation of PACs at all identified Mexican spotted owl sites. See Box C.1. in the 2012 Recovery Plan for our criteria for an owl site; and

    - Avoid conducting activities that may disturb owl sites or protected activity centers during the breeding season (March 1 to August 31) unless protocol surveys allow inference of non-nesting. In addition, the Forest Service should include threat-specific conservation measures in the forest plan for potential management actions as identified in appendix C of the 2012 Recovery Plan. Threats and stressors that may be present in the Forest include timber harvesting, wildfire, livestock grazing, energy development, land development, recreation disturbance, noise, and climate change.

14. The Forest Service should include language in the introduction identifying that the sage-grouse 2015 amendment is being developed separately from the Ashley National Forest revised forest plan and that once the plan is finalized, it will be included in the Ashley plan.

15. The language in chapter 3, page 148, should be edited as follows: "Sage-grouse management areas represent the highest-priority areas for sage-grouse conservation in Utah (State of Utah 2019). Greater sage-grouse core population areas are the highest-priority areas in Wyoming (Executive Order No. 2019-3, 2019)." This is because Wyoming uses sage-grouse core population areas, and they should not be included in the State of Utah citation.

16. Removal or burning of any old-growth stands of any species on the Ashley National Forest should not occur. There is not sufficient information on which old-growth trees of any species occur on the Forest or will be impacted by future projects within the draft EIS. Current old-growth status should be mapped using stand exams and quantitative data required to define timber sales for contract purposes and compared to both the pre-Hamilton definition and that resulting from applying the Hamilton definition (Hamilton et al. 1993, Characteristics of Old Growth Forests in the Intermountain Region, USDA, Forest Service, Ogden, UT).

Responses

1. In the Management Approach section of the draft forest plan (now appendix 3 of the forest plan), a management approach for wildlife discussed the consideration of beneficial and adverse impacts from management activities on migration corridors. This approach has been changed to a guideline (FW-GD-WILDL-15). This guideline will help identify the potential impacts to migrating wildlife and potential design criteria to minimize impacts to these areas of connective habitat from ground-disturbing activities, which would include future proposed roads. An analysis of motorized roads, road density, and the potential effects on wildlife on the Forest was completed for the Forest's motorized travel plan (Forest Service 2009). The revised forest plan provides strategic guidance; no decisions will be made regarding the regulation of public activities and access to Federal lands or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The desired conditions, standards, and guidelines in the plan will maintain habitat for wildlife, including at-risk species, throughout the Ashley National Forest. Thus, habitat within any migration corridor as well as summer and winter habitats will be maintained and will provide the needed habitat for wildlife species during migration events. Notably, wildlife migration corridors often change over time. Data that the Utah Division of Wildlife has started collecting will continue to inform where migration is occurring and when changes occur to the migration patterns.

   The desired conditions, standards, and guidelines mentioned previously will maintain vegetation/habitat for migrating species. Therefore, the connectivity for habitat needed for wildlife species movements will be maintained. Additionally, a goal in the Wildlife section of the plan is to coordinate the management of wildlife, their habitat, and management actions with the States and other local agencies. Thus, a mechanism will be in place to coordinate with the States regarding migration corridors and migrating wildlife

   Also, the regionally significant corridor mentioned in the comment was not produced by the Wasatch/Cache National Forest but was discussed by the Wasatch Cache National Forest at a smaller scale than the plan area and not at the larger scale described by the commenter.

Currently, there are caves on the Ashley that are gated to prevent disturbance to hibernacula, and the plan component will prevent disturbance to hibernacula in the future.

Appropriate sage-grouse desired conditions, objectives, and guidelines are in the plan that maintain and/or improve sage-grouse habitat, avoid sage-grouse habitat degradation, and avoid disturbance during the critical time periods for sage-grouse, which was the intent of the 2015 sage-grouse amendment. The plan components are also consistent with the Wyoming and Utah sage-grouse management plans.

Although recreation may potentially cause stress to wildlife, including bighorn sheep, it appears that bighorn sheep may be somewhat tolerant of recreation activities (Papouchis et al. 2001; MacArthur et al. 1982; Longshore et al. 2013; Wiedmann & Bleich 2014; Toweill & Geist 1999), as evidenced, for example, by the consistent use and exhibition of undisturbed behavior of bighorn sheep along Highway 191, Forest Service roads, and campgrounds near Flaming Gorge. Likewise, the Utah Division of Wildlife Resources unit management plan for bighorn sheep in this area (UDWR 2019) indicates that bighorn sheep in the area are not disturbed by recreational activities.

The word “wildfire” has been added to the first sentence of page 148 of the draft EIS. A guideline in the plan that addresses the protection of raptor nests and minimizes disturbance to nesting raptors. Additionally, the Bald and Golden Eagle Protection Act is a Federal law and therefore will be followed. There is no need to repeat the act in the proposed plan.

The literature suggested by the commenter has been reviewed.

2. During the assessment phase of the revision process, sensitive species for the Ashley National Forest under the 1986 planning rule were reviewed in regard to the 2012 Planning Rule criteria for consideration of SCC. However, the bald eagle, boreal owl, flammulated owl, great gray owl, and northern goshawk did not meet the criteria for SCC. The Ashley National Forest has not identified ungulate grazing as contributing to an identified functioning-at-risk condition relative to habitat needed to support goshawk and its prey. Thus, modification of grazing practices is unwarranted. Likewise, achieving desired conditions in the Vegetation, Non-forested Vegetation, and Aspen section in the plan will maintain prey habitat for the northern goshawk. We reviewed the Reynolds (1992) report suggested by the commenter when developing the plan components. This document contributed to plan components for snags/acre and amount of downed woody debris. Refer to the Soils and Timber sections of the plan.

3. The vegetation sections in the plan contain desired conditions for each vegetation type. Elements within desired condition components for terrestrial vegetation focus on maintaining or restoring ecological integrity, function, and resilience. Maintaining these desired conditions will provide a diversity of habitats for native species (including the pinyon jay, monarch butterfly). As stated in the Wildlife section of the plan, many of the standards and guidelines pertaining to wildlife and the desired conditions for wildlife are found in other sections of the plan (terrestrial vegetation—forested and non-forested, geologic resources and hazards, soils, watershed, aquatic, and riparian ecosystems). Desired conditions for habitat are also contained within these other sections. Where there is a specific species need that the desired conditions, standards, and guidelines in these other sections do not address, then a guideline has been added in the wildlife section to address that need.

Appendix D of the final EIS provides a crosswalk of plan components that maintain habitat and address threats for each at-risk species and pollinators (including the monarch butterfly), as well as plan components to maintain wildlife habitat types. An assessment of the forested vegetation in the plan area was completed early in the forest plan revision process, which included an assessment of the forested structural stages to the natural range of variation of the forested area. Proposed plan components for forested vegetation further refine desired conditions for structural diversity as a range from grass/forb to old forest size classes in many of the vegetation types. These plan components contain elements that address ecological integrity, ecosystem diversity and sustainability, and persistence. Structural stages are currently mapped, in part, using the Vegetation Classification, Mapping, and Quantitative Inventory (VCMQ) to assess how existing condition compares to desired condition. Proposed plan components would not preclude treatment (e.g., harvest, prescribed fire) within old forest sizes if it means treatment would bring the forest closer to desired condition.

Appendix D of the final EIS contains a crosswalk of the plan components that would maintain diversity of structural stages within the forested vegetation. These plan components are deemed sufficient to maintain ecological integrity, diversity, and habitats for forested obligate wildlife species.

Appropriate sage-grouse desired conditions, objectives, and guidelines are in the plan that maintain and/or improve sage-grouse habitat, avoid sage-grouse habitat degradation, and avoid disturbance during the critical time periods for sage-grouse, which was the intent of the 2015 sage-grouse amendment. See also the crosswalk for at-risk species, which includes sage-grouse, in appendix D of the EIS. The midget-faded rattlesnake did not meet the criteria for species of conservation concern and thus is not proposed as such. However, there is a guideline for the Flaming Gorge National Recreation Area (the area the commenter is referencing for the midget-faded rattlesnake) that directs the Ashley National Forest to coordinate with the State of Wyoming when ground-disturbing activities are proposed in the area.

The Ashley National Forest acknowledges that habitat models for the Mexican spotted owl predict habitat for this species on the Forest, but surveys have not documented the presence of this species on the Ashley National Forest. Refer to the biological assessment and the Persistence Analysis (Appendix D). Likewise, the yellow-billed cuckoo has not been documented on the Ashley National Forest and typical habitat for this species does not occur in the plan area. Refer to the biological assessment. The bald eagle, boreal owl, flammulated owl, great gray owl, monarch butterfly, and pinyon jay did not meet the criteria for species of conservation concern. The Migratory Bird Treaty Act is a Federal law that will be followed; there is no need to repeat the law in the plan.

The Ashley National Forest recognizes that the pinyon jay is a U.S. Fish and Wildlife Service bird of conservation concern, but the species did not meet the criteria for species of conservation concern for the Ashley National Forest. State rankings of the pinyon jay in Utah and Wyoming are S4 and S5, respectively, and the Integrated Monitoring in Bird Conservation Regions program's estimated trend for the pinyon jay on the Ashley National Forest and the states of Utah and Wyoming is stable to increasing (NatureServe 2022, IMBCR 2021). However, effects to the pinyon jay from management actions will continue to be considered at the project scale, and literature pertinent to the species will be considered. The Ashley National Forest also recognizes that research on the pinyon jay is needed to better understand the species and to validate

speculative threats. Regardless, the desired conditions and standards and guidelines in the plan will maintain habitat for wildlife, including the pinyon jay, in the plan area.

The boreal toad has not been documented in the Ashley National Forest, and the great gray owl is a rare visitor to Utah and is not expected to occur in the plan area since the Ashley is just at or beyond the southern extent of the species range.

The literature referenced by the commenter was reviewed, but the literature did not contain any new information other than what was already considered in the development of plan components for the forest plan.

4. Chapter 2, page 12 of the draft EIS contains a list of elements that are in common to all alternatives. To adhere to the requirements of 36 CFR 219.1(b), certain elements were designed to be in common to all alternatives. This includes to "provide appropriate habitat to support species' viability and critical habitat for threatened and endangered species across the plan area ecological conditions to contribute to the recovery of, or restore critical habitat for, federally listed threatened and endangered species or to conserve federally listed proposed and candidate species." In summary, the analysis of alternatives is the same between alternatives A, B, C, and D for elements related to at-risk plant species, including Ute ladies'-tresses. Additional analysis is not required and is not carried throughout the draft EIS. The draft EIS does provide a summary of the in-depth analysis of at-risk plant species that occurred during the assessment phase of the forest plan revision process. This more fully summarized in appendix C to the draft EIS, which includes information regarding State and Federal status, habitat description and condition, species population and distribution, stressors and drivers, known threats, and sustainability of at-risk species. Furthermore, appendix E of the forest plan is a crosswalk table that lists all applicable plan components for each at-risk species, including Ute ladies'-tresses. These plan components were designed to ensure that ecological processes are present and functioning in a manner that sustains long-term persistence, supports recovery, and maintains viable populations of all at-risk plant species. No modification has been made based on this issue statement.

5. Desired conditions, standards, and guidelines in the Vegetation, Wildlife, and Timber sections of the plan will maintain the habitat for elk and other wildlife. Additionally, a guideline in the Wildlife section of the plan specifically directs avoidance of management activities within elk and other ungulate winter ranges and during the wintering period. The plan and the draft EIS recognize the popularity of hunting elk and the economic importance of the species. In the Management Approach section of the Draft plan (now appendix 3 of the plan), a management approach for wildlife discussed the consideration of beneficial and adverse impacts from management activities on migration corridors. This approach has been changed to a guideline (FW-GD-WILDL-15). This guideline will help identify the potential impacts to wildlife migration routes and connective habitat and potential design criteria to minimize impacts to these areas of connective habitat from ground-disturbing activities, including future proposed roads. An analysis of motorized roads, road density, and the potential effects on wildlife on the Forest was completed for the Forest's motorized travel plan (Forest Service 2009). The revised forest plan provides strategic guidance; no decisions will be made regarding the regulation of public activities and access to Federal lands or the management of individual roads, trails, or areas associated with the Travel Management Rule (36 CFR 212). The literature referenced by the commenter was reviewed, but the literature did not contain any new information other than what was already considered in the development of plan components for the forest plan.

6. The suggested change on page 146 regarding "elk management in Wyoming" has been made.

7. The statements regarding sage-grouse habitat in the draft EIS are correct. The sentences referred to do not downplay the role of sage-grouse on the Ashley National Forest but merely state what actually occurs on the Forest. The amount of sage-grouse habitat and number of sage-grouse on the Ashley National Forest are quite small compared to other land ownerships that contain sage-grouse, specifically in the region and the States of Wyoming and Utah.

   It is true, as stated in table 3-33 of the draft EIS, that there are approximately 184,000 acres of mapped sage-grouse habitat on the Ashley National Forest. However, these habitat coverages, currently called priority or general habitat areas in the 2015 sage-grouse amendment, overestimate actual sage-grouse habitat on the Forest. This sage-grouse habitat mapping consists of broad-brush polygons of habitat prepared for the 2015 sage-grouse amendment and contains a substantial amount of area that is not habitat. It is true that the Wyoming portion of the Flaming Gorge National Recreation Area, excluding the reservoir, is designated as sage-grouse habitat. However, to state that all the Flaming Gorge National Recreation Area is sage-grouse habitat is inaccurate since much of the national recreation area in the Utah portion is forested and is not mapped as sage-grouse habitat. Additionally, there are substantial acres of sagebrush within the mapped sage-grouse habitat on the Ashley National Forest that are not occupied by sage-grouse. As such, the plan components focus on areas of the Forest that are actually sage-grouse habitat and that are occupied or potentially could be occupied by sage-grouse.

8. A statement has been added to the Big Game section on page 146 of the draft EIS about mountain goats and their habitat. The issue of possible transmission of pathogens between mountain goats and bighorn sheep is a State issue and is under the authority of the Utah Division of Wildlife Resources. The Forest Service has no authority to regulate bighorn sheep, mountain goats, or disease issues between them.

9. The Ashley National Forest acknowledges that there are more species of reptiles and amphibians that occur on the Ashley National Forest than are mentioned in the draft EIS, but these paragraphs are intended to speak to reptiles and amphibians more generally and not individually. It is not meant to be an exhaustive list of all reptiles and amphibians that occur on the Ashley National Forest but merely a mention of a few that are representative of the reptiles and amphibians that occur on the Forest.

10. The word “wildfire” has been added to the first sentence of page 148 of the draft EIS.

11. The desired conditions, standards, and guidelines that are associated with elk habitat are based on the best available science. These desired conditions, standards, and guidelines are largely contained in other resource sections of the plan. As stated in the Wildlife section of the plan, many of the standards and guidelines pertaining to wildlife and the desired conditions for wildlife are found in other sections of the plan (terrestrial vegetation—forested and non-forested, geologic resources and hazards, soils, watershed, aquatic, and riparian ecosystems). Desired conditions for habitat are also contained within these other sections. Where there is a specific species need that the desired conditions, standards, and guidelines in these other sections do not address, then a guideline has been added in the wildlife section to address that need. For example, there is a guideline in the Wildlife section pertaining to the maintenance of elk winter habitat and avoiding disturbance during the critical winter period. The plan contains a crosswalk (appendix E) that lists the plan components that will maintain vegetation conditions for elk habitat. The literature referenced by the commenter was reviewed, but the literature did not contain any new information other than what was already considered in the development of plan components for the forest plan.

12. Bald and golden eagles were not omitted from the plan. The Ashley National Forest is required to follow regulatory laws, including the Bald and Golden Eagle Protection Act, and thus there is no need to restate the act in the plan. Doing so would be unneeded repetition of applicable law that the Ashley is required to follow. Additionally, a specific plan component in the Wildlife section of the plan protects raptor nests (including bald and golden eagles) and avoids disturbance around those nests when active, which is consistent with U.S. Fish and Wildlife Service recommended raptor guidelines. Furthermore, as stated in the wildlife section of the plan, many of the standards and guidelines pertaining to wildlife and the desired conditions for wildlife are found in other sections of the plan (terrestrial vegetation—forested and non-forested, geologic resources and hazards, soils, watershed, aquatic, and riparian ecosystems).

    Meeting desired conditions for vegetation communities will provide the needed habitat conditions for wildlife, including bald and golden eagles. Appendix E of the plan contains a crosswalk of plan components listed by vegetation type that will maintain wildlife habitat. Refer to the crosswalk and the vegetation types associated with bald and golden eagles for a list of plan components that will maintain their habitat.

13. Past surveys on the Ashley National Forest have failed to document the presence of the Mexican spotted owl in the plan area. Likewise, there has been no documentation of this species in the plan area by the U.S. Fish and Wildlife Service or any other entity. Thus, there are no Protected Activity Centers (PAC) for this species on the Ashley NF. Habitat for this species on the Ashley National Forest is limited. Regardless, desired conditions, standards, and guidelines in the Vegetation sections of the plan will maintain habitat for wildlife species that occur on the Ashley National Forest. Specifically for raptors, there is a guideline in the Wildlife section of the plan that protects raptor nests and avoids disturbance to nesting raptors. Refer to the biological assessment and the Persistence Analysis (Appendix D).

14. Language regarding the revised sage-grouse amendment and how the Ashley National Forest will incorporate it into the forest plan revision process was included in the introduction to the Wildlife section of the draft forest plan. At that time, it was anticipated that the decision on the revised sage-grouse amendment would precede the decision on the Ashley revised forest plan. However, it is now apparent that the plan decision will precede the amendment. Therefore, a sage-grouse guideline was added to the Wildlife section of the revised forest plan that avoids degradation of sage-grouse habitat and avoids disturbance to sage-grouse during the critical time periods for the species. Desired conditions and objectives were already in the Terrestrial V section of the revised forest plan to maintain or improve sage-grouse habitat. Plan components in the plan for sage-grouse meet the intent of the 2015 sage-grouse amendment. See also the crosswalk for at-risk species, which include sage-grouse, in appendix D of the final EIS.

15. The suggested change on page 148 regarding sage-grouse has been made.

16. An assessment of the forested vegetation in the plan area was completed early in the forest plan revision process. This included an assessment of the forested structural stages to the natural range of variation of the forested area. Plan components for forested vegetation further refine desired conditions for structural diversity as a range from grass/forb to old forest size classes in many of the vegetation types. These plan components contain elements that address ecological integrity, ecosystem diversity and sustainability, and persistence. Structural stages are currently mapped, in part, using the Vegetation Classification, Mapping, and Quantitative Inventory (VCMQ) to assess how existing condition compares to desired condition. Plan components will not preclude treatment (e.g., harvest, prescribed fire) within old forest sizes if it means treatment would bring

the Forest closer to desired condition. Appendix E of the plan contains a crosswalk of the plan components that would maintain diversity of structural stages within the forested vegetation. These plan components are deemed sufficient to maintain ecological integrity, diversity, and habitats for forest-obligate wildlife species.

Wildlife – Bighorn Sheep

Letter numbers 24, 62, 64, 74, 90, 120, 126, 128

Issue Statements

1. Some commenters stated that emphasis should be placed on the dynamic between bighorn sheep, mountain goats, and domestic sheep and goats in areas like overlapping habitat, habitat integrity, and pathogens that can be passed between species. The Forest Service should include language regarding the statewide memorandum of agreement for management of bighorn sheep. However, others requested that the plan not restrict domestic sheep and goat grazing further and address the benefits they provide.

2. The Forest Service should provide more information on the history of bighorn sheep reintroduction and translocation.

3. The Forest Service should analyze the impacts of recreation on bighorn sheep.

4. The draft EIS may overemphasize the role of conifer encroachment on Rocky Mountain bighorn sheep habitat suitability in the Ashley National Forest. The Forest Service should frame management and alternative discussions around the documented limiting factors for bighorn sheep and provide specific sources.

5. The Forest Service should make the following changes to the Alternatives chapter of the draft EIS:

   On page 11: “The Forest Service also received comments on specific wildlife concerns, including management of bighorn sheep.” The Forest Service should add that it does not manage bighorn sheep or any other type of fish or wildlife. In addition, the Forest Service should indicate the type of coordination that occurs with State wildlife management agencies and how the results of such coordination are reflected in the forest plan revision.

Responses

1. A brief discussion (a paragraph) has been added to the EIS about pathogens and potential interactions of bighorn sheep, goats, and domestic sheep and overlapping habitat. The statement is correct that bighorn sheep were introduced to the Ashley National Forest in 1983. Recreation impacts to wildlife, including disturbance to at-risk species such as bighorn sheep, are generally described under each of the alternatives in the Wildlife section of the draft EIS. The draft EIS discloses potential impacts to wildlife and at-risk species and then analyzes them generally. A detailed analysis of every potential impact on every species or resource of the Forest in the EIS is not appropriate at this scale.

   Although recreation may potentially cause stress to wildlife, including bighorn sheep, it appears that bighorn sheep may be somewhat tolerant of recreational activities (Papouchis et al. 2001; MacArthur et al. 1982; Longshore et al. 2013; Wiedmann and Bleich 2014; Toweill and Geist 1999). For example, there is consistent use and exhibition of undisturbed behavior of bighorn

sheep along Highway 191, Forest Service roads, and campgrounds near Flaming Gorge. Likewise, the Utah Division of Wildlife Resources unit management plan for bighorn sheep in this area (UDWR 2019) indicates that bighorn sheep in the area are not disturbed by recreational activities. A statement has been added to the final EIS about the range expansion of bighorn sheep on the Ashley National Forest. It is true that the State of Utah no longer lists bighorn sheep as a "Species of Greatest Conservation Need." However, there are other factors in the 2012 Planning Rule that the Ashley was directed to consider in proposing species of conservation concern (SCC), and bighorn sheep met the criteria. Because bighorn sheep is a proposed SCC during the forest plan revision process, the Ashley National Forest is required by the 2012 Planning Rule to provide the ecological conditions for the persistence of the species. The plan component under alternative C that would close domestic sheep allotments upon a permit waived without preference is one method to keep them separate from bighorn sheep in a geographical area and to help minimize potential contact between bighorn sheep and domestic sheep in an area. Alternative C is only one alternative out of four that was analyzed.

The Forest Service will collaborate with the State of Utah in regard to the statewide Bighorn Sheep Management Plan as far as it is consistent with federal laws and regulations. The Forest Service acknowledges that management of bighorn sheep is under the authority of the Utah Division of Wildlife. Concerns about the expanding range of bighorn sheep in the Uinta Mountains should be addressed to the State of Utah since the Forest Service has no authority over the expansion of bighorn sheep in Utah. The literature referenced by the commenters did not provide any new information other than what was already considered in the development of plan components in the forest plan.

2. A sentence has been added to the draft EIS stating that bighorn sheep occurring on the Ashley National Forest are translocated animals.

3. Recreation impacts on wildlife, including disturbance to at-risk species such as bighorn sheep, are generally described under each of the alternatives in the Wildlife section of the draft EIS. The draft EIS discloses potential impacts on wildlife and at-risk species and then analyzes them generally. A detailed analysis of every potential impact on every species or resource of the Forest in the draft EIS is not appropriate. Although recreation may potentially cause stress to wildlife, including bighorn sheep, it appears that bighorn sheep may be somewhat tolerant of recreation activities (Papouchis et al. 2001; MacArthur et al. 1982; Longshore et al. 2013; Wiedmann and Bleich 2014; Toweill and Geist 1999), as evidenced, for example, by the consistent use and exhibition of undisturbed behavior of bighorn sheep along Highway 191, Forest Service roads, and campgrounds near Flaming Gorge. Likewise, the Utah Division of Wildlife Resources unit management plan for bighorn sheep in this area (UDWR 2019) indicates that bighorn sheep in the area are not disturbed by recreational activities.

4. This issue statement was taken from a comment regarding conifer encroachment and bighorn sheep. Bighorn sheep inhabit areas that are non-forested, and the loss of these areas would be a loss of habitat for bighorn sheep. The Ashley has documented the reduction in size of these non-forested areas due to conifer encroachment. This is an issue that negatively affects bighorn sheep as well as other wildlife species.

5. The word "management" has been changed to "issues." The 2012 Planning Rule adopts a complementary ecosystem- and species-specific approach—known as the coarse-filter/fine-filter approach—to contribute to the diversity of plant and animal communities and the long-term persistence of native species on National Forest System lands. The Forest Service manages

habitat that provides the key ecosystem characteristics for the persistence of wildlife species, including species of conservation concern such as the bighorn sheep. Forest plan components address habitat needs and threats to species of conservation concern. Public and cooperating agency engagement is discussed in chapter 1 and chapter 4 of the EIS. A forestwide wildlife goal (FW-GO-WILDL-02) states: "Management actions are coordinated with management plans of other Federal, State, and local agencies, Tribes, and adjacent landowners. Opportunities to manage wildlife habitat are expanded through coordination and collaboration along and across administrative boundaries." Another goal (FW-GO-WILDL-03) specific to collaborating with the States in minimizing the risk of contact between domestic sheep and bighorn sheep was also added to the forest plan.

Wildlife – Canada Lynx

Letter numbers 18, 123

Issue Statement

1. The Forest Service should take measures to avoid diminishing and fragmenting habitat and potential habitat for Canada lynx.

Response

1. The Ashley National Forest is considered unoccupied peripheral lynx habitat and is unlikely to support a female lynx. However, there is a plan component (FW-GD-WILDL-13) specifically for maintaining Canada lynx habitat on the Forest. This guideline is taken from the 2013 Lynx Conservation and Assessment Strategy (Interagency Lynx Biology Team 2013), and the plan is consistent with the conservation measures for peripheral habitat. Additionally, plan components for Vegetation, Forest Vegetation, and Non-Forested Vegetation also contribute to maintaining peripheral lynx habitat in the plan area. Refer to the biological assessment and the Persistence Analysis (Appendix D).

Wildlife – Eureka Mountainsnail

Letter number 64

Issue Statement

1. Because mitigation is difficult and not very feasible with the Eureka mountainsnail, the following wording should be revised:

   - Revise "06 Vegetation management activities and prescribed fires should avoid or mitigate known Eureka mountainsnail sites" to "06 Vegetation management activities and prescribed fires avoid Eureka mountainsnail sites." Because of the rarity of this species and the limited number of known sites in the Ashley National Forest, mitigation for impacts to known Eureka mountainsnail sites is not likely feasible. The Forest has identified very few species of conservation concern; as such, measures to protect these species should be specific (e.g., doing surveys for this species in potential habitats in advance of treatment activities).

Response

1. The Forest Service agrees that mitigation in this sense may not be practical for this species. The plan component has been revised to "Management actions should be designed to avoid or minimize negative impacts to known Eureka mountainsnail sites."

Wildlife – Pygmy Rabbit

Letter numbers 64, 74

Issue Statement

1. The Forest Service should provide rationale for choosing 25 percent canopy cover for sagebrush instead of 20 percent.

2. There is no reason to discuss hypothetical limitations of designated areas when no habitat exists for either at-risk species identified. The Forest Service should revise the following sentence as indicated: "At-risk species associated with shrubland habitat, such as the pygmy rabbit and greater sage-grouse, would be impacted to a lesser extent from management for designated areas; this is because fewer acres of shrubland would be classified as a designated area (see table 3-35) and no greater sage-grouse or pygmy rabbit habitat would be classified as a designated area (table 3-37). However, ecosystem resilience may decline in designated areas over time due to the lack of habitat restoration and enhancement management (for example, a lack of mechanical vegetation management to minimize the possibility of beetle epidemics and large-scale, uncharacteristic fire). Shrubland habitat would also experience this impact to a lesser extent."

   These sentences should also be changed: "Only 500 acres of shrubland are included in the proposed designated areas (table 3-36), none of which are habitat for sage-grouse or pygmy rabbits (table 3-38). As such, at-risk species associated with shrubland habitat would not realize the same benefits as other species from management for designated areas."

Response

1. The 2018 State of Washington pygmy rabbit status review states that the species needs 25 percent or greater canopy cover (Hayes 2018). The U.S. Fish and Wildlife Service (2010) 12-month finding on the pygmy rabbit states the species needs 30 percent or greater (USFWS 2010). Keinath and McGee (2004) found that pygmy rabbits needed 20 percent or greater canopy cover in Wyoming. The Ashley National Forest acknowledges that the lower canopy cover limit could be as low as 20 percent. Therefore, the guideline has been adjusted to 20 percent or greater.

2. The sentences have been revised as suggested. Additionally, the definition of special management areas (SMAs) was inconsistent in the draft EIS and is not used in the forest plan; thus, the term has been removed from the final EIS. As a result, tables 3-37, 3-38, and 3-39 referred to in this comment have been adjusted to remove the SMA language and add language for research natural areas, the Sheep Creek Canyon Geologic Area, and designated wilderness. The acres for each category have also been adjusted.

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Agency Comment Letters

EPA

United States Department of the Interior, Central Utah Project Completion Act

United States Department of the Interior /USFWS

State of Utah

State of Wyoming

Duchesne County

Uintah County

Ute Indian Tribe

Wyoming Coalition of Local Governments

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02/15/2022

Ref: 8ORA-N

Susan Eickhoff, Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, Utah 84078-1703

Dear Supervisor Eickhoff:

The U.S. Environmental Protection Agency Region 8 reviewed the U.S. Forest Service's Draft Revised Land Management Plan (Forest Plan) and associated Draft Environmental Impact Statement (EIS), CEQ No. 20210176, for the Ashley National Forest (Forest). Our comments below are provided pursuant to our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The Forest encompasses approximately 1.4 million acres of National Forest System land in northeastern Utah and southwestern Wyoming. The USFS is revising the 1986 Forest Plan because conditions, science, and policy have changed since that Forest Plan was approved. The alternatives in the Draft EIS are: Alternative A, the No-Action Alternative; Alternative B, the Draft Forest Plan and proposed action; Alternative C, a passive management alternative that emphasizes preservation of the natural setting to move toward desired conditions through natural processes; and Alternative D, which emphasizes active management of Forest resources and potential shared funding and cooperation with partners to achieve higher-end vegetation treatments and harvests.

The EPA supports many of the protections included in the Draft Forest Plan but has concerns that it does not include specific requirements (i.e., standards or guidelines) to protect air or aquatic resources. This creates uncertainty as to whether, how and to what degree air quality, air quality related values, watersheds, and water quality will be protected and restored in the future. Our enclosed comments offer recommendations on measures to protect air resources, riparian and aquatic ecosystems, and water and watershed resources, as well as areas for clarification or further discussion in the EIS.

The EPA appreciates your consideration of these comments on the Draft Forest Plan and EIS. If further explanation of these comments is desired, please contact me at (303) 312-6704 or strobel.philip@epa.gov, or Matt Hubner, lead reviewer for this project, at (303) 312-6500 or hubner.matt@epa.gov.

Sincerely,

Philip S. Strobel
Chief, NEPA Branch
Office of the Regional Administrator

Enclosure

Enclosure – EPA's Detailed Comments on the Ashley Draft Forest Plan and EIS

Air Quality

The Draft EIS does not clearly identify existing sources of air emissions on the Forest and does not evaluate whether there is development on the Forest that has been approved, but not yet constructed. For clarity, we recommend the Draft EIS identify existing and approved but unconstructed oil and gas wells and facilities on the Forest and summarize the analysis that was prepared for the Forest's South Unit EIS. We further recommend discussing other activities such as the Uinta Basin Railway, and mines (existing, approved or proposed) and including those sources as part of the environmental consequences of the Alternatives.

To better characterize existing air quality using monitoring data, we recommend presenting the results of the monitoring data in a table or figure as a trendline. This will allow the reader to understand the conclusions presented regarding air quality, and Air Quality Related Values (AQRVs) such as visibility and deposition.

The information recommended below will be useful to inform desired conditions, guidelines, standards, and objectives that the Draft Forest Plan (Alternative B, Appendix E) establishes. These metrics help ensure that actions taken by the Forest align with the broad management direction that the Draft Forest Plan establishes and that they are effective.

<u>Desired Conditions</u>
FW-DC-AQ-01 – Much of the pollution that impacts air quality on the Forest originates outside the Forest. It therefore may not be within Forest's power to provide compliance with the National Ambient Air Quality Standards (NAAQS) and State Implementation Plans. There are sensitive members of the population that may be impacted by air quality at pollution levels below the NAAQS. As such, we recommend a desired condition for air quality that is generally clean and free of pollution originating within the Forest and that natural air emissions dominate the pollutant regime. We further recommend this desired condition express that the Forest works with all nearby partners (federal, state, municipal and private) to minimize the impacts of pollutant transport affecting the Forest.

FW-DC-AQ-02 – We recommend removing the qualifier regarding short term impacts from wildland fire. The occurrence of wildfire and prescribed fire may be a desired condition. However, we recommend that the desired condition for air quality be crafted such that it is desired that there are minimal impacts to air quality from fire. This will help guide the Forest as it plans, conducts, and responds to fire events.

FW-DC-AQ-03 – We recommend this desired condition regarding nitrogen and sulfur deposition being "below published critical loads or levels for targeted resources" on the Forest be expanded such that it is one that fosters a diverse fully functioning ecosystem that is not negatively affected by nitrogen and sulfur deposition. We recommend the critical loads be identified as guidelines or standards (as identified in the USFS Target Load Strategy) by which the Forest can determine if the desired condition is being met. This would provide clarity to the direction of the desired condition.

FW-DC-AQ-04 – This desired condition does not explain what historic time-period is being referred to in order to define wildland fire occurrence. We recommend that the natural fire regime be the desired condition because historic fire regimes may have been anthropogenically suppressed as compared to natural conditions.

Guidelines

There is only one guideline proposed (FW-GL-AQ) in support of the desired conditions. We support the overarching guideline to not impede progress toward Federal and State air quality goals, but the two bullets expanding on this guideline do not seem to directly relate to future Forest decisions. They imply that new projects triggering permitting will receive control and operational requirements through the state or federal regulatory process. The reference to the determination and application of Best Available Control Technology (BACT) and Best Available Retrofit Technology (BART) are not within the Forest's authority and therefore provide no direction for the Forest as it implements this guideline to support the desired conditions.

We recommend the FL-GL-AQ guideline define how the Forest will determine if a management action or project requesting Forest approval will determine potential air quality impacts. We recommend the guideline state that activities generating emissions will be identified, and emissions will be calculated using an emissions inventory. For projects with the potential to cause a substantial increase in emissions, as well as those that would materially contribute to potential adverse cumulative air quality impacts, additional analysis, such as air quality modeling, may be required to determine the potential for exceedances of the NAAQS or AQRV thresholds. If it is found that an action may create exceedances of standards (i.e. NAAQS), guidelines, or prevent the Forest from achieving desired conditions, we recommend the Forest implement emission reduction strategies to reduce the impact to acceptable levels, or not approve the action. Emission reduction strategies may include, but are not limited to, cleaner equipment, cleaner fuel, zero emitting equipment, add-on control technologies, and reducing the pace or scope of the action. Establishment of these protocols will better define actions in the guideline to achieve the desired conditions.

The Draft Forest Plan does not currently include guidelines for AQRVs included in the desired conditions. We recommend guidelines be included for visibility and deposition to inform whether desired conditions are being met. For visibility, guidelines could include Regional Haze Reasonable Progress metrics as well as metrics developed by the Federal Land Managers (FLAG 2010). We recommend including the following guidelines based on FLAG 2010:

- The Forest will include mitigation for projects that may contribute 0.5 deciview reduction in visibility to prevent visibility degradation.
- The Forest will apply mitigation or disallow projects that would contributing 1.0 deciview or more and thereby cause visibility impairment.
- If a project would exceed the nitrogen and sulfur Deposition Analysis Threshold (DAT), the Forest will conduct additional analyses to understand the relevance of the impact, including but not limited to whether the area is exceeding or projected to be exceeding critical loads. The Forest will apply mitigation or project modifications to prevent exceedances of the DAT and Critical Loads.

The Draft EIS indicates the current management practices address fugitive dust. Due to uncertainties from future actions, such as development of a new leasing plan and variabilities due climate change, we recommend establishing a guideline in the Draft Forest Plan for fugitive dust resulting from unpaved roads and heavy machinery and earth moving activities to achieve desired conditions that fugitive dust does not create safety, health, or nuisance conditions, or significantly impact attainment of the NAAQS or AQRVs guidelines.

Lastly, we recommend the addition of a guideline or management approach to reduce greenhouse gas emissions from authorized activities on the Forest to the lowest practical levels.

Standards

In addition to the proposed guideline, we recommend that the Draft Forest Plan consider including air quality standards. While the exceedance of a NAAQS can be used as a guideline, the projected violation of a NAAQS, can be captured as a Forest Plan standard. We recommend a standard that projects should not be approved if they are projected to violate or contribute to a violation of a NAAQS. The standard can utilize the currently proposed language from FW-DC-AQ-01 that ambient air quality across the Forest complies with Federal and State standards and air quality management plans.

Objectives

We recommend adding an objective that the Forest's oil and gas leasing analysis will include analyses of air quality impacts, including greenhouse gas emissions, resulting from existing and potential future oil and gas development over the life of the Forest Plan.

Watershed, Aquatic and Riparian Ecosystems

We appreciate the Draft EIS and Forest Plan identifying that the Forest "likely contains the highest percentage of fens for national forests in the intermountain region." The EIS acknowledges the unique and irreplaceable nature of the nearly 13,000 acres of potential fen habitat. Additionally, the plan highlights other important and valuable surface and groundwater aquatic features in the Forest watersheds and riparian zones and measures to protect them. The following recommendations are intended to provide clarity in the Forest Plan and aid decision makers when the Plan is used.

Watershed and Groundwater-Dependent Ecosystems

Desired Conditions

FW-DC-WA-03 – This desired condition seeks to ensure streams, seeps, and wetlands are resilient to disturbance and predicted drier climates. It is unclear in the following objectives and guidelines how these features will be made more resilient to climate change. We appreciate this desired condition and recommend that steps to outline general protections of these features be clearly defined in guidance or objectives.

Objectives

FW-OB-WA-01 – The goal of this objective to improve the condition class of at least two priority watersheds every 10 years is noteworthy. Because the life of this Forest Plan is approximately 15 years, we recommend that the Forest consider adding language, should resources be available, that overlapping

the start of additional watershed restoration begin prior to the end of the 10 years for the preceding two restoration efforts. This could be beneficial should conditions significantly change over the life of the plan or efforts in a nearby watershed may beneficially affect an ongoing watershed improvement project.

Riparian Management Zones (RMZ)

Desired Conditions
FW-DC-RMZ-03 – Table 2 identifies RMZ widths. Our review of the Draft EIS and Forest Plan indicates that neither this section, nor any other section in the Draft EIS documents, identify setback distances for no surface occupancy (NSO) around sensitive riparian zones. As outlined in our scoping comments, we recommend that NSO setback distances be established for activities, especially fluid minerals development, near RMZs and other sensitive water and groundwater features as part of the desired conditions.

Guidelines
FW-GL-RMZ-01 – We appreciate that this guideline identifies pesticides to be used in RMZs only as necessary. We recommend this guideline incorporate language that the Forest will use an existing or any forthcoming pest management plan to select the appropriate pesticide to target specific vegetation and will ensure that the label instructions are followed. This will provide additional measures to ensure the least amount indirect impacts in water features associated with RMZs.

Cultural and Historic Resources

Goals
FW-GO-CHR-01 – This goal identifies that the Forest will meet regularly with the Wyoming State Historic Preservation Officer (SHPO) and the Utah SHPO regarding the preservation, protection, and management of cultural resources on the Forest. Though FW-GO-CHR-03 identifies collaboration with Native American tribes, the goals do not identify consultation with Tribal Historic Preservation Officers (THPO). We recommend consultation with THPOs be included in FW-GO-CHR-01.

Monitoring and Adaptive Management

We appreciate the inclusion of a framework for monitoring effectiveness of the Forest Plan. Given the large scale of this Plan and the rapidly changing conditions in the Forest associated with insects, disease, fire and drought, a detailed monitoring plan is critical to the success of this project. The Draft Forest Plan indicates that a monitoring guide is being developed and may be included with final project materials. It is unclear if this means that the monitoring guide will be included with the Final EIS. We recommend including the monitoring guide, or at a minimum a draft of the guide, with the Final EIS. Providing additional information on the monitoring protocol during the NEPA process will be useful to allow stakeholders to understand more about the monitoring program and for the Forest to obtain feedback on the guide.

The monitoring section of the Draft Forest Plan and throughout the Draft EIS identify that adaptive management (AM) will be used based on monitoring observations to make decisions or changes to meet

desired conditions. We recommend that when AM is incorporated as part of planning a detailed AM program or strategy be developed. We recommend, at a minimum, a draft AM strategy or framework be included with the Final EIS or ROD. Interagency coordination, public participation along with structured timeframes and milestones are integral features of an effective AM program. We recommend the AM program include evaluation of ongoing effectiveness Forest Plan management objectives and establish quick reaction to newly discovered concerns. We provide the following examples: (1) We recommend the Forest consider increasing monitoring frequency to act in a more-timely manner if results indicate a Forest Plan management component is not resulting in progress towards desired conditions. For example, but not limited to, if unanticipated impacts are found in aquatic resources, it may be necessary to require larger riparian buffers, reduction in treatments in or around wetlands, or changes to grazing management practices. Also, (2) we recommend incorporating additional monitoring requirements, such as instream water quality sampling, that could be included into the monitoring and adaptive management process to further facilitate timely responses and adaptation to avoid or mitigate impacts from Forest Plan management activities. (3) Air quality is another area where targeted monitoring and decision-making triggers can be incorporated into the adaptive management process as described in the air comments above. (4) Finally, adaptive management relies on a well-defined and rigorously applied monitoring program. Federal budgets for monitoring have fluctuated over time. We recommend the Final EIS discuss the process that will be applied if monitoring budgets fall short of the need for the Forest Plan. Typically, lack of monitoring would automatically trigger more environmentally conservative management activities.

Climate Change

The USFS 2012 Planning Rule developed a planning process that ensures the Forest Plan will be responsive and can adapt to the challenges of climate change. We acknowledge and appreciate the Draft EIS and Forest Plan's current climate analyses and inclusion of a climate adaptation goals. The Council on Environmental Quality encourages the Forest to use the *Final Guidance for Federal Departments and Agencies on the Consideration of Greenhouse Gas (GHG) Emissions and the Effects of Climate Change in NEPA Reviews* (August 1, 2016) in its analysis of the GHG emissions and climate impacts on the planning area. This guidance provides a reasonable approach for the Forest to outline the framework for analysis regarding GHG emissions, opportunities to reduce those emissions, climate impacts on the planning area and climate change adaptation strategies.

Consistent with Executive Order 14008, we encourage the Forest to: include goals, desired conditions, objectives, guidelines and management actions to provide for diverse, healthy ecosystems that are resilient to climate stressors; require effective mitigation and encourage voluntary mitigation to offset the adverse impacts of projects or actions; reduce greenhouse gas emissions from authorized activities to the lowest practical levels; identify and protect areas of potential climate refugia; reduce barriers to plant migration; use pollinator-friendly plant species in restoration and revegetation projects; and design facilities to mitigate potential structural impacts associated with extreme weather events.

We also recommend discussing actions to improve the forest's ability to adapt to changing environmental conditions, such as selecting resilient native species for replanting. This should anticipate the effects rising temperatures may have on soil moisture levels, seeds/seedlings growth, the vulnerability of specific species under projected climate conditions in the short and longer term, and any anticipated shift of forest species to more suitable range elevations. Lastly, as USFS considers the wilderness evaluation process, timber suitability, and areas open to livestock grazing and energy and

mineral development, such as the Flaming Gorge National Recreation Area, we recommend considering whether conservation commitments are needed to achieve the goal in Section 216 of E.O. 14008, of conserving 30 percent of the nation's lands and waters by 2030.

Environmental Justice (EJ)?

Section 219 of E.O. 14008 identifies that "Agencies shall make achieving environmental justice part of their missions by developing programs, policies, and activities to address the disproportionately high and adverse human health, environmental, climate-related and other cumulative impacts on disadvantaged communities…" We recommend that the Final EIS and Forest Plan further evaluate and establish desired conditions and related guidelines or objectives for EJ in the Forest Plan, where possible, to achieve the goals of the E.O. For example, the air quality comments above discuss populations that may be sensitive to air quality conditions below NAAQS. Page 205 of the Draft EIS identifies that EJ communities may disproportionally have health impacts, such as asthma due to air quality conditions. Incorporating desired conditions in the Forest Plan to protect disadvantaged communities and applying them when it comes to Forest management or development such as future minerals and energy leasing analyses would be beneficial for those communities on or in the vicinity of the Forest already impacted by ambient air quality pollution or acute changes in air quality. For instance, the Forest could incorporate protocols to identify and directly reach out to communities with residents that may not receive customary notifications of prescribed fire activities or proposed development. Additionally, an adaptive management strategy based on the proposed monitoring program would incorporate measures to address Forest changes or management activities that impact EJ communities. This would help the Forest identify changes to management approaches or develop Forest Plan amendments to better serve the impacted communities.

United States Department of the Interior

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Ms. Susan Eickhoff
Forest Supervisor, Ashley National Forest
Attn: Forest Plan
355 North Vernal Avenue
Vernal, Utah 84078

Subject: Draft Environmental Impact Statement for the Ashely National Forest Plan Revision – Section 201(a) – Central Utah Project Completion Act

Dear Ms. Eickhoff:

We recently received an email message informing us that the Draft Environmental Impact Statement (DEIS) for the Ashely National Forest Plan Revision is available for review and comment. The Department of the Interior, Central Utah Project Completion Act (CUPCA) Office requests that we be made aware of any future meetings, input requests, or process deadlines associated with this revision process. We have previously provided four letters to the Forest Service regarding associated efforts sent October 18, 2006; July 3, 2007; December 5, 2007; and September 20, 2016. Copies of these letters are enclosed.

Currently the DEIS does not adequately address Central Utah Project (CUP) withdrawn lands issues. We believe the following information and concerns should be addressed fully in the DEIS. This will improve both public and agency understanding regarding withdrawn lands and could serve as a basis of understanding during future negotiations, especially as staff changes occur.

History

The CUPCA, Public Law 102-575, authorized the development of features to complete the CUP. This Act also established the CUPCA Office and developed a partnership arrangement with the Central Utah Water Conservancy District and the Utah Reclamation Mitigation and Conservation Commission for the purpose of implementing CUPCA.

The CUP is a large, Federal water resources development project that moves water via a system of reservoirs, tunnels, aqueducts, and other control features from the Colorado River Basin to the Bonneville basin in Utah. There are many parcels of land within the area of evaluation that have been withdrawn or acquired by fee for the purpose of developing the CUP or other Projects. Access to and future development of these lands and existing facilities are critical to the

completion of the CUP. These facilities and withdrawn lands are not available for wilderness, wild and scenic river, or any other status consideration. Lands withdrawn from the public domain for CUP are exclusively for the development, operation, maintenance, and protection of the CUP unless the express approval of the Secretary of the Interior is given for other purposes or projects.

Withdrawn Lands Law

Land withdrawals are issued by the Bureau of Land Management and transfer administrative jurisdiction over a parcel of land from one federal agency to another. For our purposes, from the Department of Agriculture Forest Service to the Department of the Interior (Interior). A withdrawal creates a title encumbrance on the land restricting the Forest Service's ability to manage withdrawn lands under their multiple use management principles. Withdrawn lands remain Federal property under the ultimate administration of the Bureau of Land Management, however jurisdiction for managing these lands is granted to the agency withdrawing the lands. No title to the land is granted to the agency withdrawing the land.

As defined in the Federal Land Policy and Management Act of 1976, PL 94-579, (43 USC 1714)(FLPMA) withdrawal means withholding an area of Federal land from settlement, sale, location, or entry under some or all of the federal land laws, for the purpose of limiting activities under those laws in order to maintain other public values in the area for a particular public purpose or program; or transferring jurisdiction over an area of Federal land from one department, bureau, or agency to another department, bureau, or agency.

Lands are withdrawn for purposes of specific federally authorized projects such as development, construction, maintenance, operation, and protection of federal projects. The Secretary of the Interior (Secretary) is authorized to make, modify, extend, or revoke withdrawals under FLPMA. Withdrawals are made for reserving public land only in cases where it is necessary to assume complete management jurisdiction over an area of public land.

Congress has passed several acts that address issues associated with the Bureau of Reclamation withdrawn lands. These acts are discussed below.

The Reclamation Act of 1902, 43 USC 391:

Section 3 of the Reclamation Act directs that the Secretary shall withdraw from public entry the lands required for any irrigation works contemplated under the provisions of this act. Under the Act's opinions on this section, it is noted that Reclamation withdrawn lands are reserved lands, and that withdrawals made by the Secretary have the force of legislative withdrawals. It is also stated that withdrawals within the national forest are dominant. Any leases granted on withdrawn lands by the Secretary of Agriculture should be subject to the prior approval of the Secretary of the Interior.

Sundry Civil Expenses Appropriations Act for 1920:

This act states that proceeds received from the lease of any lands reserved or withdrawn under the Reclamation law or from the sale of the products therefrom shall be recovered into the

Reclamation fund; and such lands shall be and remain under the jurisdiction of the Secretary of the Interior.

Under opinions of this act, it is stated that the act serves two purposes: first, to clearly establish the authority of the Secretary of the Interior to lease, etc., lands withdrawn under the Reclamation law; and second, where conflicting authorities exist, to establish the paramount authority of the Secretary to so deal with such lands in all cases where they are needed for the protection or operation of any reservoir or other works constructed under the Reclamation Law. The opinion regarding national forests states that Reclamation withdrawals within the national forests are dominant, and that all leases should be subject to the prior approval of the Secretary of the Interior. Lease includes any authorized use or occupancy.

We appreciate your tremendous efforts to revise the Ashely National Forest Plan, and your invitation to contribute to its completion. If you have any questions, please contact Mr. W. Russ Findlay at (801) 379-1084 or by e-mail to wfindlay@usbr.gov. For Text Telephone Relay Service access, call the Federal Relay System Text Telephone (TTY) number at (800) 877-8339.

Sincerely,

Reed R. Murray
Program Director

Enclosures

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ER21/0484 February 07, 2021

Lars Christensen
355 North Vernal Ave
Vernal, UT 84078

Subject: Comments on Draft Environmental Impact Statement for the Ashley National Forest Plan Revision, UT

Dear Mr. Christensen,

The U.S. Department of the Interior (Department), including the Bureau Reclamation's (Reclamation) Provo Area Office and the U.S. Fish and Wildlife Service (USFWS) Utah Ecological Services Field Office, has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for Ashley National Forest (Forest) Plan Revision, located within Utah. We understand that USFS' proposed action is to create one unified forest plan for the Ashley National Forest. The revised forest plan will describe the strategic intent of managing the Ashley National Forest for the next 10 to 15 years and will address the identified need to change the existing forest plan. We offer the following comments in response to the Draft EIS from the Reclamation and USFWS.

Reclamation Comments

Reclamation has concerns in regard to withdrawn lands for the Central Utah Project- Bonneville Unit. The Central Utah Project Completion Act Office, and the Central Utah Water Conservancy District are currently coordinating directly with USFS staff to ensure Bonneville Unit interests are being considered. We appreciate this coordination and hope that it will continue so that these interests remain taken into consideration.

USFWS Comments

Migratory Birds

The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, and transport (among other actions) of migratory birds, their eggs, parts, and nests, except when specifically permitted by regulation. The list of migratory birds protected under the MBTA includes more than 1,000 species (50

CFR 10.13; April 5, 1985). On October 4, 2021, the USFWS published a final rule (86 FR 54642) revoking the January 7, 2021, regulation (86 FR 1134) that limited the scope of the MBTA regulations. As of December 3, 2021, the USFWS returned to implementing the MBTA as prohibiting incidental take and applying enforcement discretion, consistent with judicial precedent and long-standing agency practice prior to 2017.

Additionally, the USFWS released a Director's order (No. 225, October 4, 2021; USFWS 2021a) clarifying that enforcement efforts will be focused on specific types of activities that both foreseeably cause incidental take and where the proponent fails to implement known beneficial practices (best management practices, conservation measures, best practices, mitigation measures, etc.) to avoid or minimize incidental take. Furthermore, the Director's order clarifies that Federal agencies conducting activities in accordance with a signed memorandum of understanding (MOU) with the USFWS developed under Executive Order 13186 for the conservation of migratory birds will not be priorities for law enforcement. The USFWS will continue to provide technical assistance in developing beneficial practices to minimize effects to migratory birds, consistent with our signed 2008 MOU with USFS relating to EO 13186 (FS Agreement # 08-MU-1113-2400-264). We attached project recommendations for migratory bird conservation (USFWS 2020) for your consideration when implementing actions that may adversely affect migratory birds.

The Conservation of Migratory Birds, Bald and Golden Eagle Protection Act (BGEPA) affords eagles additional protections beyond those provided by the MBTA by making it unlawful to "molest or disturb" eagles or destroy their nests. The take of eagles may be permitted when the taking is: 1) associated with, but not the purpose of the activity, and cannot practicably be avoided, and 2) where the take is compatible with the preservation of eagle populations, which means it must be consistent with the goal of stable or increasing breeding populations.

For raptors, we recommend use of the *Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances* (Guidelines; Romin and Muck 2002) to provide consistent application of raptor protection measures statewide and provide compliance with environmental laws regarding raptor protection. Raptor survey and conservation measures are provided in the Guidelines to ensure that proposed projects under the Plan avoid adverse effects to raptors, including bald and golden eagles. Locations of existing raptor nests and eagle roosting areas should be identified prior to the initiation of project activities. Appropriate spatial buffer zones of inactivity should be established during breeding, nesting, and roosting periods. Arrival at nesting sites can occur as early as December for certain raptor species and can continue through August.

The Birds of Conservation Concern 2021 List (BCC 2021; USFWS 2021b) identifies the migratory and non-migratory bird species (beyond those already designated as federally threatened or endangered) that represent our highest conservation priorities. The list is based on an assessment of several factors, including population abundance and trends, threats on breeding and nonbreeding grounds and size of breeding and nonbreeding ranges. We recommend the Forest evaluate and minimize effects to migratory bird habitat, focusing on species listed in BCC 2021. For example, the pinyon jay (*Gymnorhinus*

cyanocephalus) is an obligate bird of piñon-juniper and other pine-juniper woodlands that has experienced significant population declines and is of increasing conservation concern and is found on this list. Pinyon jay population declined 83.5% from 1967-2017 (Pardieck et al. 2018), and half of the remaining population is predicted to be lost within 19 years (Rosenberg et al. 2016). Pinyon jay is significantly declining in all states where the bird occurs (range -3.1 to - 4.5% per year) (Pardieck et al. 2018). We recommend the Forest evaluate and minimize effects to pinyon jay by implementing management recommendation found in Chapter Six of the *Conservation Strategy for the Pinyon Jay* (Somershoe et al. 2020).

Endangered Species

The Plan area contains occupied and potential habitat for several species listed under the Endangered Species Act (ESA). As such, we recommend the Plan fully evaluate all consequences of the proposed action and identify appropriate conservation measures to avoid, minimize, or mitigate effects to listed species for projects and actions identified under the Plan. We encourage the Forest to work with our office to identify reasonable, appropriate, and meaningful measures that will not only mitigate the effects of the Plan but will also assist in the conservation of the species, per direction to Federal agencies under section 7(a)(1) of the ESA. In addition, we encourage the Forest to work with our office to properly identify effects determinations for ESA-listed species affected by actions under the Plan.

Formal consultation under the ESA (50 CFR 402.14) is required if the Federal agency determines that an action is likely to adversely affect a listed species or critical habitat (50 CFR 402.02). Federal agencies should also confer with the USFWS on any action that is likely to jeopardize the continued existence of any proposed species or result in the destruction or adverse modification of proposed critical habitat (50 CFR 402.10). A written request for formal consultation or conference should be submitted to the USFWS with a completed biological assessment and any other relevant information (50 CFR 402.12).

Oftentimes, ESA section 7(a)(2) consultations for large management plans such as the Plan are complex because aspects of the land management plan may be implemented over extended periods of time, with some actions that occur immediately after the NEPA Records of Decisions and other potential long-term actions that are not immediately identified under land zone prescriptions. The challenge with ESA section 7(a)(2) consultation on land management plans are fulfilling the FWS's responsibility for making a 7(a)(2) opinion while recognizing that not all future actions and their probable effects are known at this time. To address this challenge, the FWS and National Marine Fisheries Service promulgated an addition to the regulations on Interagency Cooperation (50 C.F.R. § 402) in 2015 that was designed to deal with conflicting court cases regarding incidental take in consultations (80 FR 26832). The concepts discussed in the preamble to the regulations and the regulatory definitions promulgated into the Code of Federal Regulations can inform the consultation process for the Plan.

Several definitions were added to the regulation for purposes of conducting formal ESA section 7(a)(2) consultation and issuing an incidental take statement for large scale management plans. The two definitions most relevant to the Plan are the definitions for a "Framework Programmatic Action" and a

"Mixed Programmatic Action." A "Framework Programmatic Action" means, for purposes of an incidental take statement, a Federal action that approves a framework for the development of future action(s) that are authorized, funded, or carried out at a later time, and any take of a listed species would not occur unless and until those future action(s) are authorized, funded, or carried out and subject to further section 7 consultation.

The regulations describe a "Mixed Programmatic Action" as "… a Federal action that approves action(s) that will not be subject to further section 7 consultation, and also approves a framework for the development of future action(s) that are authorized, funded, or carried out at a later time, and any take of a listed species would not occur unless and until those future action(s) are authorized, funded, or carried out and subject to further ESA section 7 consultation." The Plan could fit the description of either a framework programmatic action or mixed programmatic action depending on whether the management prescriptions identified in the includes both planning-level actions (actions that set agency direction, but do not authorize implementation of those actions on the ground) and implementation-level actions (actions that can immediately be implemented upon approval). Please note the USFS's implementation of planning-level actions will be subject to future ESA section 7 consultation, if necessary.

If the USFS's proposed action for the Forest Plan including both planning-level and implementation level actions, our regulations support consulting on the USFS's action as a "mixed programmatic action." This distinction allows the FWS to issue an incidental take statement for those parts of the action that are specific enough that we can meet the regulatory burden of reasonable certainty to issue an incidental take statement. Where that degree of certainty is not met, the FWS can still judge the action against the 7(a)(2) jeopardy/ adverse modification standard, make a conclusion, but not have to exempt take (since we can't meet the reasonable certainty burden). The planning-level decisions and actions where we cannot reasonably determine incidental take at this time would still be subject to ESA section 7(a)(2) compliance during implementation of those decisions and actions.

<u>Mexican Spotted Owl</u>

We listed Mexican spotted owl (*Strix occidentalis lucida*) as a federally threatened species in 1993 (58 FR 14248; March 16,1993). The Recovery Plan was completed in 1995, revised in 2012 (USFWS 2012), and we designated critical habitat in 2004 (69 FR 53182: August 31, 2004). The primary threats to the species at the time of listing were commercial-based timber harvest and stand-replacing wildland fire (USFWS2012).

We believe Mexican spotted owl warrants further consideration in the DEIS. Within the Forest, models indicate several areas meeting the description of rocky-canyon habitat suitable for Mexican spotted owl nesting, roosting, foraging, wintering, or dispersal (Willey 1997; Lewis 2014). We recommend addressing the presence of suitable habitat more comprehensively throughout the DEIS, as areas of suitable habitat within the Forest that are assumed unoccupied but have not been recently surveyed may have become occupied at a later date. Additionally, we recommend reconsideration of your use of the 2x2 rule (as referenced in Appendix C) as the primary criteria for identifying Mexican spotted owl habitat

within the Forest. Our interpretation of the 2x2 rule is to be inclusive of canyons 2 km wide and at least 2 km long as potential habitat and is not meant to exclude canyons identified through modeling efforts that do not meet those size requirements (USFWS 2002). We recommend the Forest identify and provide information on locations in the Forest where Mexican spotted owl suitable habitat is present by conducting a desktop habitat suitability assessment using either the Willey 1997 or Lewis 2014 habitat models in conjunction with field reviews (Se 2002) and consider effects to the species within these areas in the Forest Plan.

We also recommend that you incorporate the following general conservation measures established in the 2012 Recovery Plan into the Forest Plan:

- Survey any area that could be occupied by nesting spotted owls using the established survey protocol (USFWS 2012, Appendix D) before implementing any management action that will alter habitat structure or influence owl behavior;
- Maintain and enhance existing nesting/roosting habitat for Mexican spotted owl through the establishment and conservation of PACs at all identified Mexican spotted owl sites. See Box C.1. in the 2012 Recovery Plan for our criteria for an owl site; and
- Avoid conducting activities that may disturb owl sites or PACs during the breeding season (01 March to 31 August) unless protocol surveys allow inference of non-nesting.

In addition, we recommend that you include threat-specific conservation measures into the Forest Plan for potential management actions as identified in Appendix C of the 2012 Recovery Plan. Threats and stressors that may be present in the Forest include timber harvesting, wildfire, livestock grazing, energy development, land development, recreation disturbance, noise, and climate change.

<u>Western yellow-billed cuckoo</u>

We listed the western Distinct Population Segment (DPS) of Yellow-billed cuckoo (*Coccyzus americanus*) as a federally threatened species in 2014 (79 FR 59992; November 3, 2014). The primary threats to the species are riparian habitat loss and degradation (USFWS 2014).

We agree with your determination that there is unlikely to be suitable riparian habitat that meets the patch size requirements for the species within the Forest; however, we recommend adjusting your habitat assessment criteria to reflect the smaller patch sizes (greater than 12 acres) found in Utah (see our attached *Guidelines for the identification and evaluation of suitable habitat for western yellow-billed cuckoo in Utah*). If additional suitable habitat is identified using this updated criterion, we recommend effects to Western yellow-billed cuckoo be thoroughly discussed in the DEIS and that you include threat-specific conservation measures into the Forest Plan specific to the species. Threats and stressors that may be present in the Forest include energy development, land development, recreation disturbance, noise, and climate change.

Ute ladies'-tresses

Ute ladies'-tresses is listed as a threatened species under the Endangered Species Act (Act) (57 FR 2048; January 17, 1992). There is identified potential habitat and occupied habitat for the species within the Plan area.

Currently Ute ladies'-tresses and at-risk plants are only mentioned generally in Chapter 3, subheading "Environmental Consequences for Wildlife". We recommend addressing the presence of occupied and suitable habitat for Ute ladies'-tresses more comprehensively throughout the DEIS. Additionally, we recommend that the effects to Ute ladies'-tresses and at-risk plant species be thoroughly discussed in a section specific to vegetation rather than wildlife. We also recommend that you include threat-specific conservation measures into the Forest Plan specific to the species. Threats and stressors that may be present in the Forest Plan proposed actions include effects from vegetation and fuels management, livestock grazing and management, recreation, and designated areas.

Canada lynx

We listed the contiguous United States Distinct Population Segment (DPS) of Canada lynx (*Lynx canadensis*) as threatened in 2000 because of the inadequacy, at that time, of regulatory mechanisms on some Federal lands to provide for the conservation of lynx habitats and populations. The Forest currently contains unoccupied lynx habitat that is considered peripheral. Due to the classification of this habitat, there is a greater degree of flexibility for management activities on the Forest. That said, we recommend incorporating conservation measures into the DEIS to continue supporting this secondary habitat.

Per the Lynx Conservation Assessment and Strategy (Interagency Lynx Biology Team 2013), the focus of management in peripheral habitat is to provide a mosaic of forest structure to support snowshoe hare prey resources for individual lynx that infrequently may move through or reside temporarily in the area. Vegetation management can support snowshoe hares and lynx with the creation of dense early-successional forest conditions as well as mature multi-story conifer stands (USFWS 2017). We also recommend designing timber harvest, planting, and thinning to include some representation of young dense regenerating stands in the mosaic for snowshoe hare production areas. Landscape connectivity should also be maintained to allow for any lynx movement and dispersal. Although the Forest does not contain core habitat for the species, we recommend including measures in the DEIS to avoid diminishing lynx and hare habitats with forest management practices that may alter natural disturbance patterns and regimes, create unnaturally large or continuous openings, fragment habitat, or eliminate connectivity/dispersal habitats.

Monarch butterfly

Monarch butterfly is a candidate species for listing under the ESA and may occur throughout the Plan area. We recommend addressing the potential for breeding and migrating monarch butterflies in the DEIS and integrating voluntary conservation measures for western monarch butterfly for all breeding and migratory habitat in the Plan area, whenever feasible and appropriate. Voluntary conservation actions for

monarch butterfly include conducting management actions that may affect butterflies outside of the estimated timeframe for monarch presence; protecting monarchs, their habitats, and other pollinators from pesticides; avoid planting tropical milkweed and replace existing tropical milkweed with native milkweed; reporting monarch and milkweed occurrences in the Plan area; and encourage the growth of diverse native, nectar plants with bloom times across the monarch breeding and migratory season (USFWS 2021c). Please see our attached *Western Monarch Butterfly Conservation Recommendations* for more details on these conservation actions.

Other Listed Species

Other federally listed species may occur in the Plan area based on the identification of potential habitat. To expedite information sharing, we created an Information, Planning, and Conservation System (IPaC) that is available online at http://ecos.fws.gov/ipac/. IPaC can be used to identify any potential federally threatened or endangered species in your Project area by using the "Get Started" button. We recommend that you use IPaC to inform the species list, habitat suitability evaluations, and surveys that may be needed for this Plan and other planning and management activities. Site-specific projects designed under the Forest Plan would be subject to consultation requirements under section 7 of the ESA where they may affect federally listed species.

Greater Sage-grouse and Sagebrush Ecosystems

Greater sage-grouse (*Centrocercus urophasianus*) is a species of conservation concern in Utah. In 2015, we determined that the greater sage-grouse was not warranted for protection under the ESA. Our decision followed an unprecedented conservation partnership across the western United States that has significantly reduced threats to the greater sage-grouse across 90 percent of the species' breeding habitat. Our decision relied on effective implementation of Federal land-use plans, including increased efforts to control invasive species and wildfire in sagebrush ecosystems. Success in restoring the health of the sagebrush ecosystem also requires the continued commitment of Federal agencies, private landowners, industry, and conservation organizations to avoid and minimize effects to greater sage-grouse and their sagebrush habitat.

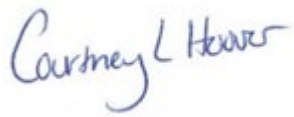
The Plan area overlaps the greater sage-grouse Wyoming Basin and Strawberry Priority Areas for Conservation (PAC), important areas for greater sage-grouse, as identified in the Conservation Objectives Team final report (USFWS 2013). The Wyoming Basin and Strawberry PACs and other PACs comprise those areas necessary for maintaining greater sage-grouse representation, redundancy, and resilience across the landscape. Preserving the integrity of all identified PACs is an essential foundation for greater sage-grouse conservation.

We recognize that greater sage-grouse management in the Forest will be directed by the September 2015 Sage Grouse Management Plan Record of Decision, or the most recent interagency greater sage-grouse management plan. Because management of the sagebrush biome may be most effective with a move

toward maintenance of ecosystem resilience and resistance and conservation of the entire suite of sagebrush-dependent and -associated species, we recommend the Forest implement conservation measures in important sagebrush habitats in addition to PACs for greater sage-grouse (Remmington 2021). Threats to the sagebrush biome include altered fire regimes, invasive plant species, conifer expansion, overabundant free-roaming equids (wild horses [*Equus caballus*] and burros [*Equus asinus*]), energy development, cropland conversion, infrastructure, improper livestock grazing, and climate change (Remmington 2021).

We thank you for the opportunity to comment on the DEIS. If you have any questions regarding this memo for Reclamation, please contact Theresa Taylor at ttaylor@usbr.gov or (303) 445-2806. For questions related to USFWS's comments, please contact Joe Moore, Biologist, at (385) 285-7921, or email joseph_moore@fws.gov. If you have any questions for the Department, please contact me at (303) 478-3373, or courtney_hoover@ios.doi.gov.

Sincerely,



Courtney Hoover, Regional Environmental Officer
Office of Environmental Policy and Compliance

Project Recommendations for Migratory Bird Conservation
U.S. Fish and Wildlife Service, Utah Field Office (May 2020)

The Migratory Bird Treaty Act (MBTA) is the cornerstone of migratory bird conservation and protection in the United States. The MBTA implements four treaties that provide for international protection of migratory birds. The USFWS maintains a list of all species protected by the MBTA at 50 C.F.R. § 10.13. This list includes over one thousand species of migratory birds, including eagles and other raptors, waterfowl, shorebirds, seabirds, wading birds, and songbirds. The MBTA does not protect introduced species such as the house (English) sparrow, European starling, rock dove (pigeon), Eurasian collared-dove, and non-migratory upland game birds.

The U.S. Fish and Wildlife Service (USFWS) recommends that the following migratory bird conservation measures be implemented as you complete your project:

a. Wherever possible we recommend that projects be completed outside the migratory bird nesting season to avoid and minimize impacts to migratory birds.

b. If the project includes the loss or degradation of migratory bird habitat then complete all portions of the project that could impact migratory birds outside the maximum migratory bird nesting season. This includes ground-disturbing activities, habitat removal, clearing or cutting of vegetation, grubbing, burning, etc. If that is not feasible, we recommend that you complete the project outside the minimum migratory bird nesting season.

    The time period associated with the maximum migratory bird nesting season is approximately December to August. The time period associated with the minimum migratory bird nesting season is April 1 to July 15 (time-frame when the majority of annual bird nesting occurs).

c. If the project needs to occur during the migratory bird nesting season, impacts to birds can be avoided or minimized by completing vegetation treatments and vegetation clearing and removal actions during the fall and winter (outside the migratory bird nesting season per above) prior to the nesting season when the project will begin.

d. If a project may impact migratory birds and/or cause the loss or degradation of migratory bird habitat, and such work cannot occur outside the migratory bird nesting season, we recommend surveying impacted portions of the project area to determine if migratory birds are present and nesting. Surveys should emphasize detecting presence of USFWS Birds of Conservation Concern, take place during the nesting season the year before the nesting season in which project is scheduled to occur, and should document presence of migratory birds at least throughout the entire minimum migratory bird nesting season (April 1 to July 15). Nest surveys should be conducted by qualified biologists using accepted survey protocols.

e. If your project must occur during the maximum migratory bird nesting season, implement measures to prevent migratory birds from establishing nests in the potential impact

area. These steps could include covering equipment and structures and hazing birds away from the project footprint. Migratory birds can be hazed to prevent them from nesting until egg(s) are present in the nest. However, we acknowledge that hazing migratory birds away from a project site is likely only practical for projects with a relatively small footprint (i.e. projects about 5 to 10 acres in size or smaller). Do not haze or exclude access to nests for bald or golden eagles or any migratory bird species federally listed under the Endangered Species Act (ESA), as these actions are prohibited without a permit for these species.

f. If your project must be scheduled during the maximum migratory bird nest season, and vegetation clearing and removal work cannot be completed prior to the nesting season, then we recommend performing a site-specific survey for nesting birds no more than 7 days prior to all ground-disturbing activities or vegetation treatments.

    If you document active migratory bird nests during project nest surveys, we recommend that a spatial buffer be applied to these nests for the remainder of the nesting season. Vegetation treatments or ground-disturbing activities within the buffer areas should be postponed until after the birds have fledged from the nest. A qualified biologist should confirm that all young have fledged.

We recommend the use of the *Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances* (Romin and Muck 2002) to provide consistent application of raptor conservation measures to your project or action in Utah. We provide recommendations for raptor surveys and conservation measures in the Guidelines to ensure that proposed projects will avoid adverse impacts to raptors. Locations of existing raptor nests should be identified prior to the initiation of project activities. We recommend that appropriate spatial buffers and timing limits be applied to your project for raptors during crucial breeding and nesting periods relative to raptor nest sites or territories per our Guidelines. Raptors may initiate nesting as early as December for certain species. Nesting and fledging can continue through August and for some species the young may not fledge from nests until September.

ATTACHMENT 1

Guidelines for the identification and evaluation of suitable habitat for western yellow-billed cuckoo in Utah

The purpose of this guidance is to assist federal agencies and project proponents in identifying areas that provide suitable, occupied habitats for western yellow-billed cuckoos (cuckoo) in Utah, and should be further evaluated for potential effects from proposed project activities.

Step 1: Identify and delineate all riparian habitats within 0.5 mile[1] of the proposed action, below the elevation of 8,500 feet.

Step 2: Identify suitable cuckoo breeding, nesting habitat, including associated foraging areas.

Riparian habitat patches used by breeding and nesting cuckoos vary in size and shape, ranging from a relatively contiguous stand of mixed native/exotic vegetation to an irregularly shaped mosaic of dense vegetation with open areas. The following parameters characterize suitable breeding and nesting cuckoo habitat:

- Vegetation that is predominantly multi-layered, with riparian canopy trees and at least one layer of understory shrubby vegetation;
    - Riparian overstory and understory vegetation that supports suitable cuckoo habitat may include: cottonwood (*Populus spp*), willow (*Salix* spp), alder (*Alnus spp*), walnut (*Juglans spp*), boxelder (*Acer spp*), sycamore (*Plantanus spp*), ash (*Fraxinus spp*), mesquite (*Prosopis spp*), tamarisk (*Tamarix spp*), and Russian olive (*Elaeagnus angustifolia*). Suitable understory vegetation does not include grasses or forbs although herbaceous vegetation is often present alongside shrubby understory.
    - Western yellow-billed cuckoo nest in tamarisk, consequently, the presence of tamarisk should not eliminate a vegetation patch from a suitability determination. However the potential for cuckoo occurrence decreases rapidly as the amount of tamarisk cover increases.
- Patches of multi-layered vegetation (as described above) that are at least 12 acres (5 ha) or greater in extent and separated from other patches of suitable habitat by at least 300 meters;
- Somewhere within a patch, the multi-layered riparian vegetation (as described above) should be at least 100 meters wide by 100 meters long. This is to avoid patches that may be long enough to meet the minimum area (12 acres) but are so narrow that they are unsuitable-- 750 m x 75 m (length x width) for example; and,
- Open areas, or gaps of multi-layered vegetation within a patch are less than 300 meters.

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1 A 0.5 mile distance is the area in which impacts to cuckoos may occur from project-associated noise, light, and human disturbance. Actual effects may vary depending on the type of activity and noise levels. For example, drilling rig operations may create more noise and human disturbance than infrequent traffic associated with monitoring well sites.

Breeding and nesting cuckoos will forage in riparian patches that have a single layer overstory canopy and are within 300 meters (m) of the edge of suitable breeding and nesting habitat.

STEP 3: Suitable cuckoo breeding, nesting, and foraging habitats within 0.5 mile of project activities should be surveyed to determine if a habitat patch contains cuckoos.

STEP 4: Habitats determined to be occupied by cuckoos should be evaluated for potential effects from project activities. If adverse effects to cuckoos are anticipated, federal agencies should initiate section 7 consultation with the U.S. Fish and Wildlife Service under the Endangered Species Act.

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Halterman, M., M.J. Johnson, J.A. Holmes and S.A. Laymon. 2016. A Natural History Summary and Survey Protocol for the Western Distinct Population Segment of the Yellow-billed Cuckoo. Draft May 2016: U.S. Fish and Wildlife Techniques and Methods, 45 p.

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U.S. FISH AND WILDLIFE SERVICE

April 29, 2021

Western Monarch Butterfly Conservation Recommendations:

Purpose: Section 7(a)(1) of the Endangered Species Act of 1973 (ESA), directs federal agencies to use their authorities to further the purpose of the ESA, by conducting conservation programs for the benefit of endangered and threatened species. Conservation recommendations are discretionary activities that an action agency may undertake to avoid and minimize the adverse effects of a proposed action, implement recovery plans, or to develop information that is useful for the conservation of listed species. The purpose of the following conservation recommendations is to encourage federal agencies to incorporate monarch butterflies into their Environmental Assessments and Biological Assessments associated with Section 7 Biological Opinions (BO), when in consultation with the U.S. Fish & Wildlife Service. These recommendations are organized by habitat zone, so that they may be cut/paste, as applicable and contingent upon project location. There is potential utility for these recommendations beyond Section 7, and they are intended to promote benefits for other pollinators as well.

Background: The western monarch butterfly population has declined by more than 99 percent since the 1980s. An estimated 4.5 million monarchs overwintered on the California coast in the 1980s, whereas in 2020, the population estimate for migratory overwintering monarchs was less than 2,000 butterflies. This extreme population decline is due to multiple stressors across the monarch's range, including the loss and degradation of overwintering groves; pesticide use, particularly insecticides; loss of breeding and migratory habitat; climate change; parasites and disease. Historically, the majority of western monarchs spent the winter in forested groves near the coast from Mendocino County, California, south into northern Baja California, Mexico. In recent years, monarchs have not clustered in the southern-most part of their overwintering range, and they are likely year-round residents in some areas of the coast. This resident phenomenon is plausibly due to a combination of climate change, and an abundance of residential-planted non-native, evergreen tropical milkweed that is available for monarchs year-round. Migratory western monarchs leave the overwintering groves in mid-winter to early-spring. Throughout the spring and summer, monarchs breed, lay their eggs on milkweed, and migrate across multiple generations within California and other states west of the Rocky Mountains. In an attempt to reverse the severe population decline of western monarch butterflies, and to protect other pollinators as well, we encourage implementation of the conservation recommendations listed below. Please also see the "Priority Restoration Zones in California for Recovering Western Monarchs" map (Figure 1) for suggested areas to focus conservation actions. Western monarch habitat outside of California is considered Priority level 3, where conservation actions are still important, especially for the larger pollinator community.

Please contact Samantha Marcum (samantha_marcum@fws.gov) or Cat Darst (cat_darst@fws.gov) with questions or suggestions on these recommendations.

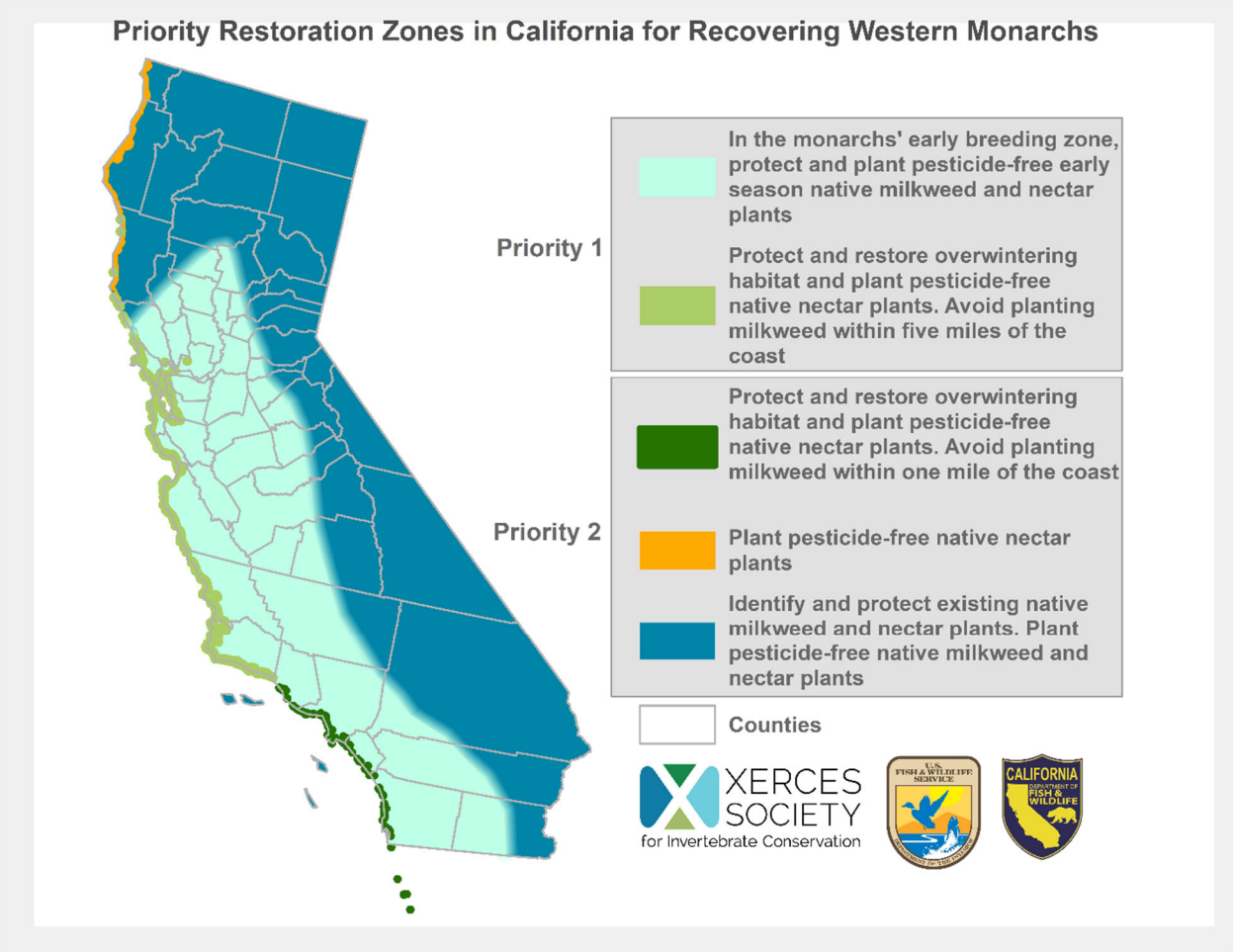

Figure 1. Priority Monarch Habitat Restoration Areas in California.

<u>Coastal California Overwintering Habitat</u>: Western monarchs migrate to the California coast, and cluster in a specific set of forested tree groves during the fall and winter each year. The overwintering groves provide protection from inclement weather, and possess suitable vegetation and microclimate conditions for monarchs (e.g., roosting trees, wind protection, dappled sunlight, nectar sources, water and/or dew for hydration, high humidity, and an absence of freezing temperatures). In the overwintering zone of the coast (i.e., within five miles of the coast from Mendocino County south through Santa Barbara County, and within one mile of the coast from Ventura County south through San Diego County), we recommend the following:

1. Protect, manage, enhance and restore monarch butterfly overwintering groves (Find An Overwintering Site).

2. Conduct overwintering grove habitat assessment(s), and develop and implement long-term grove management plans, as applicable. Management plan actions for groves may include, but are not limited to:

    a. Enhance roosting trees within overwintering groves and within 1/2 mile of groves by planting native insecticide-free trees (e.g., Monterey pine *(Pinus radiata)*, Monterey cypress *(Cupressus macrocarpa)*, Coast redwood *(Sequoia sempervirens)*, coast live oak *(Quercus agrifolia),* Douglas fir *(Pseudotsuga menzesii),* Torrey pine (*Pinus torreyana*), western sycamore *(Platanus racemosa),* bishop pine *(Pinus radiata)* and others, as appropriate for location).

    b. Avoid the removal of trees or shrubs within 1/2 mile of overwintering groves, except for specific grove management purposes, and/or for human health and safety concerns. The maintenance of trees and shrubs within a 1/2 mile of these sites provides a buffer to preserve the microclimate conditions of the winter habitat.

    c. Conduct management activities in groves from March 16-September 14, in coordination with a monarch biologist, such as tree trimming, mowing, burning and grazing in monarch overwintering habitat outside of the estimated timeframe when monarchs are likely present.

    d. Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves and within one mile of the groves (Nectar Planting Lists).

3. Protect monarchs, other pollinators, and their habitats from pesticides (i.e., insecticides and herbicides).

    a. Avoid the use pesticides within one mile of overwintering groves, particularly when monarchs may be present. If pesticides are used, then conduct applications from March 16-September 14, when possible.

    b. Screen all classes of pesticides for pollinator risk to avoid harmful applications, including biological pesticides such as *Bacillus thuringiensis* (UC Integrated Pest Management).

    c. Avoid the use of neonicotinoids or other systemic insecticides, including coated seeds, any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity.

    d. Avoid the use of soil fumigants.

    e. Consider non-chemical weed control techniques, when possible (Cal-IPC Non-chemical BMPs).

Please contact Samantha Marcum (samantha_marcum@fws.gov) or Cat Darst (cat_darst@fws.gov) with questions or suggestions on these recommendations.

f. Avoid herbicide application on blooming flowers. Apply herbicides during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants.

g. Whenever possible, use targeted application herbicide methods, avoid large-scale broadcast applications, and take precautions to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows).

h. Separate habitat areas from areas receiving chemical treatments with a pesticide-free spatial buffer and/or evergreen vegetative buffer of coniferous, non-flowering trees to capture chemical drift. The appropriate monarch and pollinator habitat spatial buffer size is contingent upon several factors, including weather and wind conditions, but at a minimum, the habitat should be at least 40 feet from ground-based pesticide applications, 60 feet from air-blast sprayers, and 125 feet from any systemic insecticide applications or seed-treated plants.

4. To minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration, do not plant non-native tropical milkweed (*Asclepias curassavica*). OE is able to build up on tropical milkweed, because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs.

5. Remove tropical milkweed that is detected, and replace it with native, insecticide-free nectar plants suitable for the location (Nectar Planting Lists).

6. To assist in maintaining normal migration behavior, do not plant any type of milkweed within five miles of the coast from Mendocino County south through Santa Barbara County, and within one mile of the coast south of Santa Barbara County.

7. After appropriate training, conduct grove monitoring for butterflies during the Western Monarch Counts each fall and winter. When possible, report when monarchs arrive and depart the groves each year (Western Monarch Count).

8. To provide benefits for monarchs and other pollinators anywhere on the landscape within the overwintering zone, install native, insecticide-free nectar plants that bloom throughout the year, as is feasible, for the location (Nectar Planting Lists).

Breeding and Migratory Habitat: Monarch butterflies breed and migrate across multiple generations each year throughout the western U.S. The early breeding zone is an estimated area in California where monarchs are likely to breed and/or lay their eggs on milkweed after departing the overwintering groves in mid-winter to early spring each year (See Figure 1, Priority Restoration Zones in California map, above). Early emerging milkweed species are likely a limiting factor on the landscape in the early breeding zone and may be associated with the severe population decline of western monarchs, and these plants are essential to successfully create the next generation of migratory butterflies. For monarch breeding and migratory habitat, we recommend the following:

Priority 1 Zone:

1. Enhance and maintain habitat in the Priority 1 early breeding zone of California, (Figure 1, above), by identifying and protecting existing habitat, and planting native, insecticide-free early-emerging milkweed species (e.g., *Asclepias vestita, A. californica, A. eriocarpa, A. cordifolia, A. erosa*), and native, insecticide-free flowering plants that are available to monarchs from January-April, as appropriate for the project location (Nectar Planting Lists; Milkweed Seed Finder).

Priority 2 Zone:

2. Enhance and maintain habitat in the Priority 2 breeding/migratory habitat zone of California (Figure 1, above) and in other western States, by identifying and protecting existing habitat, and planting native, insecticide-free milkweed species and flowering plants that are appropriate for the location (Nectar Planting Lists).

For All Breeding and Migratory Zones:

3. Conduct management activities such as mowing, burning and grazing in monarch breeding and migratory habitat outside of the estimated timeframe when monarchs are likely present (Figure 2, Recommended Management Timing Map, below).

4. Protect monarchs, other pollinators, and their habitats from pesticides (i.e., insecticides and herbicides).

    a. Avoid the use of pesticides when monarchs may be present, when feasible (Figure 2, Recommended Management Timing Map, below).

    b. Screen all classes of pesticides for pollinator risk to avoid harmful applications, including biological pesticides such as *Bacillus thuringiensis* (UC Integrated Pest Management).

    c. Avoid the use of neonicotinoids or other systemic insecticides, including coated seeds, any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity.

    d. Avoid the use of soil fumigants.

    e. Consider non-chemical weed control techniques, when feasible (Cal-IPC Non-chemical BMPs).

    f. Avoid herbicide application on blooming flowers. Apply herbicides during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants.

g. Whenever possible, use targeted application herbicide methods, avoid large-scale broadcast applications, and take precautions to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows).

h. Separate habitat areas from areas receiving treatment with a pesticide-free spatial buffer and/or evergreen vegetative buffer of coniferous, non-flowering trees to capture chemical drift. The appropriate monarch and pollinator habitat spatial buffer size is contingent upon several factors, including weather and wind conditions, but at a minimum, the habitat should be at least 40 feet from ground-based pesticide applications, 60 feet from air-blast sprayers, and 125 feet from any systemic insecticide applications or seed-treated plants.

5. To minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), do not plant non-native tropical milkweed (*Asclepias curassavica*). OE can build up on tropical milkweed and infect monarchs, because these plants are evergreen and do not die back in the winter. OE can be lethal to monarchs.

6. Remove tropical milkweed that is detected, and replace it with native, insecticide-free milkweed and native, insecticide-free nectar plants appropriate for the location.

7. Report milkweed and monarch observations from all life stages, including breeding butterflies, to the Monarch Milkweed Mapper or via the project portal in the iNaturalist smartphone app.

8. To provide benefits for monarchs and other pollinators anywhere on the landscape within the breeding/migratory zone, install native, insecticide-free milkweed and native, insecticide-free nectar plants that bloom throughout the year, as is feasible for the location (Nectar Planting Lists; Milkweed Seed Finder).

Please contact Samantha Marcum (samantha_marcum@fws.gov) or Cat Darst (cat_darst@fws.gov) with questions or suggestions on these recommendations.

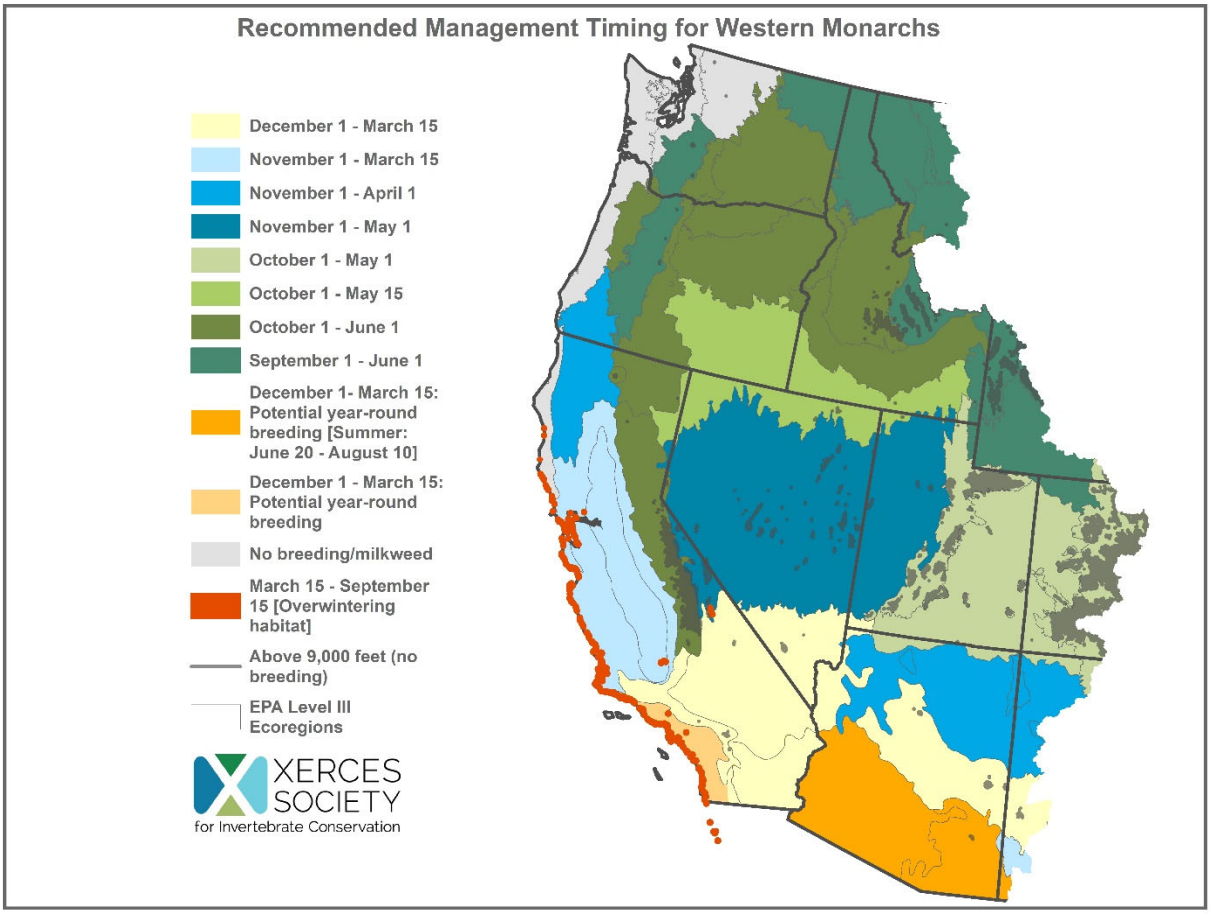

Figure 2. Recommended Management (i.e., mowing, burning, grazing, pesticide applications) Timing Windows in the western U.S. by Zone.

Please contact Samantha Marcum (samantha_marcum@fws.gov) or Cat Darst (cat_darst@fws.gov) with questions or suggestions on these recommendations.

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U.S. Fish and Wildlife Service (Service). 2021c. Western monarch butterfly conservation recommendations. 7 pp.

State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
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Office of the Governor
Public Lands Policy Coordinating Office

REDGE B. JOHNSON
Executive Director

February 17, 2022

Submitted via electronic mail: https://www.fs.usda.gov/main/ashley/landmanagement/planning

Susan Eickhoff
Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, Utah 84078

Subject: **Ashley National Forest Plan Revision Draft EIS**
RDCC Project No. 81423

Dear Supervisor, Eickhoff:

The state of Utah (State) has reviewed the Ashley National Forest Plan Revision Draft Environment Impact Statement (DEIS). The State appreciated participating as a Cooperating Agency in the preparation of the Forest Plan Revision and the DEIS. The State submitted scoping comments on November 8, 2019 and comments on March 10, 2021 and August 3, 2021, and reaffirms those comments and incorporates them by reference. Alternative D seems most consistent with the State's interests. The Forest Service has addressed many of the State's comments in the DEIS, but numerous concerns remain. In collaboration with the Department of Agriculture and Food (UDAF) and the Division of Water Quality (DWQ), the State offers the following general and technical comments for your consideration.

General Comments

Future management of the Ashley National Forest is very important to the State, the affected counties, and citizens who use the forest for a wide variety of recreation activities or to generate income for their families. Decades of passive forest management under the current plan has led to unhealthy forest conditions which make it ripe for disease and uncharacteristic wildfire.

Cooperation, Coordination and Consistency

Under NEPA, all Federal Agencies must complete a NEPA analysis for proposed actions that are likely to have an impact on the natural or human environment, such as this forest plan revision. Federal Agencies can designate State and Local Governments to become formal partners in the NEPA process, as Cooperating Agencies. A State or Local Government can be a Cooperating Agency when it has special expertise with respect to any environmental impact involved in the project proposal. Cooperating Agency status gives the State or Local Government early input into NEPA analyses and some ability to shape the goals and framework of the Federal proposal. This office appreciates the opportunity to have served as a Cooperating Agency through the process of developing this environmental analysis.

When creating Land Use Plans, the USFS is required to coordinate their Plans with State and Local Government plans. Coordination is a separate process from Cooperation and must occur regardless of whether State or Local Governments were designated Cooperating Agencies. Agencies must make efforts to draft Federal Plans that coordinate with State and Local Plans.

The National Forest Management Act requires the USFS to coordinate with local governments but does not specify how the process of coordination is to be accomplished.

Forest Service regulations require:

- Responsible officials coordinate with local governments.
- Responsible officials shall review local plans and policies that are relevant to the federal plan. The review will consider the objectives of local plans, the compatibility and interrelated impacts between local and federal plans, opportunities to address impacts and contribute to joint objectives, and opportunities to resolve or reduce conflicts. This review must be included in the NEPA document.
- The responsible official will not direct or control management of lands outside of the planning boundary.

Consistency between federal, state, local, and tribal plans is the desired outcome for the coordination and cooperation processes required of federal agencies. The importance of coordination and cooperation between state, local, and Federal agencies during planning processes cannot be overstated. Early involvement and equal consideration in environmental reviews, as Interdisciplinary Team members, stakeholders, and Cooperating Agencies was the State's main objective and motivation for creation of the State Resource Management Plan (SRMP). The SRMP and subsequent implementation plans shall be followed unless inconsistent with any federal statute or duly promulgated regulation.

Page 6 of the DEIS states that: "The Forest Service collaborated with cooperating agencies throughout the planning process to consider ways the forest plan could contribute to

common objectives, address impacts, resolve or reduce conflicts, and contribute to compatibility between the Forest Service and other agencies' plans."

The state requests that the DEIS be amended to recognize that some of the cooperating agencies have their own resource management plans (such as the State of Utah and all the Utah counties) and indicate whether the Forest Service intends for the forest plan to be consistent with these state and county resource management plans to the greatest degree possible.[1]

Page 11 of the DEIS states that: "The Forest Service also received comments on specific wildlife concerns, including management of bighorn sheep."

The State requests that the DEIS recognize that the Forest Service does not manage bighorn sheep or any other type of fish or wildlife. Such is the responsibility of state wildlife management agencies. The DEIS should indicate the type of coordination that occurs between the Forest Service and the state wildlife management agencies and how the results of such coordination are reflected in the forest plan revision.

Page 323 of the DEIS addresses "Plan Consistency Review." Unfortunately, there is no mention in this section of several inconsistencies between alternatives B and C and Utah State and County Resource Management Plans identified in this letter.

Several areas of inconsistency between the proposed forest plan revision and its alternatives are discussed below.

Special Designations (Wilderness & Wild and Scenic Rivers)

Page 5 of the DEIS states that: "Such temporary classifications do not guarantee formal designation, but they do influence forest plan guidance of how to manage the recommended areas."

The State's position is that there is no "temporary classification" established when a recommendation is made for a wild and scenic river or wilderness designation.[2] Only Congress has the authority to "classify" lands or waters as wilderness or wild and scenic rivers. Instead, the term "recommended designation" (see footnote 1 in Table 2-1) should be used.

Page 12 of the DEIS states that: "All alternatives will provide management direction in keeping with language in legislative direction for the designated High Uinta Wilderness Area (276,175 acres on the Ashley National Forest). Inventoried roadless areas (approximately 637,700 acres on the Ashley National Forest) will be managed in accordance with relevant regulations."

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[1] www.rmp.utah.gov
[2] https://rmp.utah.gov/wp-content/uploads/SRMP_Web.pdf

This acreage data for the HUWA appears incorrect. There are over 289,000 acres of High Uinta Wilderness acres in Duchesne County alone. Pages 69 and 70 indicate that there are 274,000 acres of HUWA in the Ashley National Forest and page 158 indicates 276,175 acres. The Uinta-Wasatch-Cache National Forest states that this wilderness area accounts for 456,705 acres.[3] Please specify the correct acreage in future documents.

Page 17 of the DEIS states that: "Alternative B would add additional designated areas to protect special resources. This alternative would include management of two recommended wilderness areas (see appendix A, figure 2-21)."

Establishing additional wilderness areas on the forest is inconsistent with the Daggett County Resource Management Plan[4], Duchesne County Resource Management Plan (CRMP)[5], Uintah County Resource Management Plan[6], and the State of Utah Resource Management Plan (SRMP).[7] For example, a significant portion of Duchesne County's land area (13.82%) is already under wilderness designation. These lands, additional wilderness acreage in adjoining counties and inventoried roadless areas on the Ashley National Forest, provide ample opportunities for persons seeking solitude.

For example, the Duchesne CRMP[8], in Section 23, contains the following policies associated with Wilderness:

1. *The county's support for any recommendations made under a statutory requirement to examine the wilderness option during the revision of land and resource management plans or other methods will be withheld until the following are clearly demonstrated that:*

    a. *The adopted transportation plans of the state and county or counties within the federal land management agency's planning area (National Forest or BLM land) are fully and completely incorporated into the baseline inventory or information from which plan provisions are derived.*

    b. *Valid state or local roads and rights-of-way are recognized and not impaired in any way by the recommendations.*

    c. *The possibility of future development of mineral resources by underground mining or oil and gas extraction by directional or horizontal drilling or other non-surface disturbing methods are not affected by the recommendations.*

[3] https://www.fs.usda.gov/detail/uwcnf/about-forest/districts/?cid=fsem_035477
[4] https://rmp.utah.gov/wp-content/uploads/Daggett-Chap-RMP-FINAL-w-appendix.pdf
[5] https://rmp.utah.gov/duchesne-county/
[6] https://rmp.utah.gov/wp-content/uploads/Uintah_CRMP_2019_.pdf
[7] https://rmp.utah.gov/wp-content/uploads/SRMP_Web.pdf
[8] https://rmp.utah.gov/wp-content/uploads/Duchesne-General-Plan-2019-update.pdf

d. *The need for additional administrative or public roads necessary for the full utility of the various multiple uses, including recreation, mineral exploration and development, forest health activities, operation and maintenance of water facilities, and grazing operations on adjacent land, or on subject lands for grand-fathered uses, are not unduly affected by the recommendations.*

e. *Analysis and full disclosure are made concerning the balance of multiple-use management in the proposed areas.*

f. *The analysis compares the full benefit of multiple-use management to the recreational, forest health, and economic needs of the state and the county to the benefits of the requirements of wilderness management.*

g. *The conclusion of all studies related to the requirement to examine the wilderness option are submitted to the county for review and action, and the results in support of or in opposition to, are included in any planning documents or other proposals that are forwarded to the United States U.S. Congress.*

h. *Areas must merit the suitability requirements contained in the Wilderness Act of 1964 unless requirements are changed by U.S. Congress.*

3. *Any proposed wilderness designations in the county forwarded to U.S. Congress for consideration must be based on a collaborative process in which support for the wilderness designation is unanimous among federal, state, and county officials.*

8. *In accordance with Utah Code 63J-8-104 (b) and (c), it is the policy of the county that federal land management agencies shall:*

a. *Not designate, establish, manage, or treat any of the subject lands as an area with management prescriptions that parallel, duplicate, or resemble the management prescriptions established for wilderness areas or WSAs, including the non-impairment standard applicable to WSAs or anything that parallels, duplicates, or resembles that non-impairment standard.*

b. *Recognize, follow, and apply the wilderness settlement agreement between the State of Utah and the U.S. Department of the Interior.*

c. *Revoke and revise BLM Manuals H 6310, 6320, and 6330.*

d. *Recognize that BLM lacks congressional authority to manage subject lands, other than WSAs, as if they are or may become wilderness.*

e. *Recognize that even if BLM were to properly inventory an area for the presence of wilderness characteristics, BLM still lacks authority to make or alter project*

level decisions to automatically avoid impairment of any wilderness characteristics without express congressional authority to do so.

Furthermore, additional objectives and policies for Uintah County can be found on pages 63 and 64 of Uintah CRMP and for Daggett County on pages 68 through 70 of the Daggett CRMP.

Furthermore, the State opposes the recommendation of new Wilderness Study Areas after June 1992.

- *The State of Utah will actively participate in all public land management planning activities.*
- *The State of Utah opposes any legislation introduced in Congress to designate additional Wilderness Areas except for legislation introduced by a member of Utah's congressional delegation.*
- *The State of Utah opposes any legislation introduced in Congress to designate additional Wilderness Areas unless such legislation is supported by the respective county commission or county council in the county impacted by the proposed legislation.*
- *The State of Utah will actively participate with federal partners in making wilderness management plans.*
- *The State of Utah opposes the management of non-wilderness federal lands as de facto wilderness, including "wildlands," "lands with wilderness characteristics," "wilderness inventory areas," and other such administrative designations.*
- *The State of Utah opposes the review of additional U.S. Forest Service lands for wilderness, except for the reviews expressly provided for in the Utah Wilderness Act of 1984, §201(b).*

    1. *(a) secure for the people of Utah, present and future generations, as well as for visitors to Utah, the benefits of an enduring resource of wilderness on designated state-owned lands.*

Considering these state and county policies, the wilderness recommendations of alternatives B and C must not be selected. The only alternatives that would be consistent with state and county polices associated with wilderness are A and D.

Effects of Wilderness Management on Forest Health

Page 71 of the DEIS states that*: "Wilderness management protects riparian and wetland ecosystems through minimizing ground disturbance, eliminating motorized access, and reducing recreation use, all of which reduce impacts on riparian and wetland vegetation and inhibit the spread of nonnative species."*

This may be true in the short term, but the "hands-off" approach to wilderness management increases the long-term risk of uncharacteristic wildfire, which can destroy riparian and wetland ecosystems, impact air quality, water quality, and cause other downstream impacts.

Page 71 of the DEIS also states that: *"Hydrologic processes can be adversely affected by management activities, such as fire suppression, prescribed fire, timber extraction, fuels reduction, noxious weed treatments, road construction, recreation, and livestock grazing."*

It should be recognized here that hydrologic processes can also be adversely affected by the lack of management activities in special designation areas such as wilderness. The inability to conduct restoration projects in wilderness area will hamper efforts to restore watersheds inside wilderness to properly functioning condition.

Page 73 of the DEIS states that: "*In turn, 1,670 acres of riparian vegetation communities, 1,000 acres of wetland vegetation, and 960 acres of possible or likely ferns would receive increased protection through designation of these river corridors (table 3-9)."*

The 42 miles of the Uinta River tributaries suitable for Wild and Scenic Rivers (WSR) designation are within the High Uintas Wilderness Area; so WSR designation really does not provide increased protection; the protection against management activities, such as timber harvest, is already in place. Multiple layers of special designations within wilderness are not necessary.

Page 117 of the DEIS states that: *"Terrestrial vegetation would be subject to wilderness management direction, as described in "Environmental Consequences for Terrestrial Vegetation Common to All Alternatives, in these areas."*

Here would be a good place to recognize that wilderness management direction relies on natural processes, which removes many tools otherwise available to benefit terrestrial vegetation communities.

Page 119 of the DEIS states that: *"Terrestrial vegetation types, primarily alpine and conifer forest, would be subject to wilderness management direction, as described previously."*

Again, the State requests that the document be amended here to recognize that wilderness management direction removes many tools otherwise available to benefit terrestrial vegetation communities and wildlife.

Page 119 of the DEIS states that: *"Alternative D also allows for minimum impact suppression tactics only in wilderness. Emphasis is to manage fire for protecting developed resources and would have limited focus to maintain or improve terrestrial vegetation types."*

It is important to have flexibility in the forest plan revision to suppress naturally occurring fires in wilderness before they spread out of wilderness areas and do tremendous damage to ecosystems. The state recommends adding this flexibility to Alternative B.

Effects of Wilderness Management on Recreation

Page 15 of the DEIS states that: "*Mechanized travel (i.e., mountain bikes) is permitted on existing roads and trails.*"

E-bikes continue to grow in popularity as they offer an alternative mode of transportation for those physically unable to pedal a mountain bike over steeper terrain. The DEIS should indicate whether "e-bikes" are considered motorized travel or mechanized travel and if they would be permitted in special designation areas on the Ashley National Forest.

Page 185 of the DEIS (Table 3-52) indicates that the visitor satisfaction levels in designated wilderness areas, (associated with developed facilities and services) rates at 96.6% satisfaction. This data seems suspect when there are no developed facilities or services allowed in wilderness areas.

Page 205 of the DEIS states that: "*Access for recreation would also be maintained for all communities. However, the level of access and the recreational experience may be affected by variation in management areas that restrict future motorized access (i.e., recommended wilderness).*"

The State requests that the DEIS be amended here to recognize that wilderness areas restrict access to citizens with mobility disabilities and the elderly; many of which also have low incomes and should be part of the environmental justice considerations.

Page 206 of the DEIS states that: *"As discussed in the recreation section, users looking for solitude may have limited opportunities in the Ashley National Forest due to high demand and limited ROS classes with these opportunities." Page 207 states that: "However, communities valuing solitude and naturalness for cultural uses may have limited options in the long term."*

This statement is highly subjective and the State questions these conclusions that there may be limited opportunities/options for solitude considering there are at least 276,175 acres High Uintas Wilderness on the Ashley National Forest (with even more acreage on the Uinta-Wasatch-Cache National Forest) and some 637,700 acres of Inventoried Roadless Areas on the Ashley National Forest that provide ample land area for solitude seekers.

Effects of Wilderness Management on the Timber Industry

Page 211 of the DEIS states that*: "In addition, alternative C has the lowest level of forest product removal of the action alternatives. This is because of an emphasis on natural processes for vegetation management and an increase in the acres managed as recommended wilderness areas and backcountry recreation areas where timber harvest would be restricted. This alternative would result in the lowest availability and removal of forest products and the associated economic effects related to the timber industry. Economic effects of forest product removal under alternative C would support 35 jobs and $1.8 million in labor income in the local economy, annually."*

Page 244 of the DEIS states that: *"Alternative B would introduce two additional areas for recommendation as wilderness, totaling approximately 10,300 acres. These newly recommended wilderness areas would prohibit timber production to maintain the option for future designation as wilderness, thus reducing the acres suitable for production when compared with alternative A."*

Page 245 of the DEIS states that: *"Alternative C would include the most acres managed to maintain wilderness characteristics; no acres would be found suitable for timber harvest within these areas to preserve the suitability of these areas for wilderness designation. Alternative C would also introduce additional miles of suitable [streams] for inclusion in the NWSRS. This would reduce the available acres for timber harvest."*

The reduction of lands suitable for timber production in favor of additional wilderness acreage under alternatives B and C would be inconsistent with adopted state and local resource management plan policies as follows:

The Daggett CRMP states the following on pages 30-31 regarding forest management and timber:

- *All forested lands must be managed for sustained yield, multiple use and forest health.*
- *Fire, timber harvesting, and treatment programs must be managed to prevent waste of forest products.*
- *Management programs must provide for fuel load management and fire control to prevent catastrophic events and reduce fire potential at the urban and industrial interface.*
- *Management and harvest programs must be designed to provide opportunities for local citizens and small businesses.*
- *It is the County's policy to protect timber resources and promote the continuation of a sustainable wood products industry.*
- *Sale sizes should provide opportunities for a wide spectrum of producers and allows for local entrepreneurship.*

- *Commercial firewood harvesting is needed and could be a help in fuel load management and fire control. Encourage USFS to open appropriate areas for commercial timber harvest.*
- *Participate in the planning for and revision of USFS forest management plans and Bureau of Land Management resource management plans affecting forest management. When revising or updating a forest plan, USFS should engage with the county in developing alternative management strategies and management policies.*
- *Encourage USFS to find commercial uses for timber and forest products affected by wildfire or pests.*
- *Collect and provide data to USFS regarding appropriate forest management methodologies. Data may include published scientific literature, local case studies, inventories, or other pertinent information.*
- *USFS forest plans should address commercial tree species selection, stocking levels, age class distribution, integrated pest management, and fuel loading. Additionally, areas for timber and nontimber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.*
- *Removal of forest products shall be viewed as achievable and sustainable provided that appropriate science and technology are used.*
- *Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.*
- *Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.*
- *Grazing on national forest land should be tied to historic levels and healthy forest conditions. AUMs should be maintained; vacant allotments should be actively restocked.*

The Uintah CRMP states the following objectives and policies on pages 25 through 27 regarding forest management and timber:

- *Use active and adaptive forest management to improve forest health and support multiple use and sustained yield with emphasis on employment, forest product production, open space, wildlife habitat, forage, recreation, and other social and economic benefits.*
- *Manage forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by society, including ecosystem and community health and resilience.*

- *Encourage and support the expansion of the local forest product market at sustainable harvest levels.*
- *Develop new markets for timber and forestry products that are available for harvest (e.g., use timber products for bracing in nearby coal mines or biofuels industry).*
- *When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.*
- *Manage forest watersheds for optimal yield without compromising other resources.*
- *Seek opportunities to use and harvest forest products that have been affected by wildfire or pests (e.g., beetle).*
- *Reduce time required for National Environmental Policy Act processes associated with timber harvests so that economic benefits can be maximized.*
- *Support best management practices that incorporate multiple use and sustained yield for all forest resources.*
- *Participate in the planning for and revision of USFS forest management plans and Bureau of Land Management resource management plans affecting forest management.*
- *Encourage USFS to open appropriate areas for commercial timber harvest.*
- *Encourage USFS to find commercial uses for timber and forest products affected by wildfire or pests.*
- *When revising or updating a forest plan, USFS should engage with the county in developing alternative management strategies and management policies.*
- *Collect and provide data to USFS regarding appropriate forest management methodologies. Data may include published scientific literature, local case studies, inventories, or other pertinent information.*
- *USFS forest plans should address commercial tree species selection, stocking levels, age class distribution, integrated pest management, and fuel loading. Additionally, areas for timber and non-timber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.*
- *Removal of forest products shall be viewed as achievable and sustainable provided that appropriate science and technology are used.*
- *Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.*
- *Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and*

enhanced forest health, in accordance with the National Healthy Forest Initiative.

- *Grazing access on national forest land should be tied to historic levels and healthy forest conditions.*
- *Manage forest watersheds for optimal yield without compromising other resources.*
- *Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, Uintah County Resource Management Plan 2017 | 27 shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.*
- *Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.*
- *Management programs must provide for fuel load management and fire control to prevent catastrophic events and reduce fire potential at the urban interface.*
- *Sale sizes should provide opportunities for a wide spectrum of producers and allow for local entrepreneurship.*
- *Uintah County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially with in the county and their suggested future management classifications.*
- *Uintah County supports efforts by the State of Utah to petition the Department of Agriculture and Congress to establish new management provisions for Inventoried Roadless Areas across the state.*
- *Uintah County, along with its General Plan and Resource Management Plan, shall be directly involved in the development and implementation of the Management Plan for the USFS, particularly in regards to planning for the Ashley Karst National Recreation and Geologic Area. Uintah County requires that the Secretary shares such plan with the county before it is finalized. (Amended 8/12/2019)*

The Duchesne CRMP contains several relevant objectives and policies as follow:

Duchesne CRMP, page 31:

- *(6) Duchesne County supports the wise use, conservation and protection of public lands and their resources, including well-planned management prescriptions. It is the County's position that public lands be managed for multiple uses, sustained yields, prevention of waste of natural resources, and to protect the health, safety and welfare of the public. It is important to the County economy that public lands be properly managed for fish, wildlife,*

> *livestock production, timber harvest, recreation, energy production, mineral extraction and the preservation of natural, scenic, scientific and historical values.*

Duchesne CRMP, page 35:

It is the policy of Duchesne County that multiple-use and sustained-yield management means that federal agencies should develop and implement management plans and make other resource-use decisions that:

> *Are designed to produce and provide the desired vegetation for the watersheds, timber, food, fiber, livestock forage, and wildlife forage, and minerals that are necessary to meet present needs and future economic growth and community expansion without permanent impairment of the productivity of the land;*

Duchesne CRMP, pages 40-41.

> ***Vegetation Management Policies for Special Designation Areas***
>
> *In special designation areas, permittees, local, state, and federal entities shall cooperate, consult and coordinate in order to actively manage vegetation with a full range of management tools and techniques including, but not limited to, mechanical, chemical, agricultural, natural, or other methods as deemed necessary by the permittee or entity.*
>
> *Duchesne County finds the unhealthy state of the forest and timber resources in the County to be unacceptable. Duchesne County supports proper and active management of forest resources, as well as the myriad of resources that will be adversely affected by catastrophic wildfire. Such active management requires logging, motorized access, mechanical and chemical treatments, as well as monitoring, thinning, reclamation and seeding.*

Duchesne CRMP, page 42

> ***Watershed Policies in Special Designation Areas***
>
> *Vegetation management projects in watershed areas shall include restoration and removal or timber to limit wildfire impacts, protect riparian areas, ensure appropriate water flows and enhance water flows.*

Duchesne CRMP, page 146

Forest Management Policies

Management strategies shall protect timber resources from fire (in accordance with the National Fire Plan), insects, and disease. Such management strategies shall provide for proper vegetation management practices so that excessive fuel loading and high intensity fires do not damage soil productivity.

Duchesne CRMP, page 312

Inventoried Roadless Area Policies

Managing public lands for "wilderness characteristics" circumvents the statutory wilderness process and is inconsistent with the multiple-use and sustained-yield management standard that applies to all BLM and USFS lands that are not wilderness areas or WSAs and adversely affects the counties' economy in terms of the grazing, tourism, oil and gas extraction, mining, timber industries, and water resource development.

The State of Utah Resource Management Plan contains the following:

Utah SRMP, page 114:

Forest Management Policies:

Encourage timber harvesting to prevent fuel load and biomass buildup.

Encourage prompt removal and salvage of drought, fire, and beetle killed timber and reseed or replant as appropriate to maintain healthy forests and watersheds.

Utah SRMP, page 134

The State of Utah supports the concept of multiple-use and sustained yields on public lands. Federal lands should be managed to produce the maximum yield of timber, forage, recreation, and minerals at sustainable levels. Agriculture is an integral part of the multiple-use concept.

Utah SRMP, page 238

§ 63J-4-401. Planning duties of the planning coordinator and office

(6) The state planning coordinator shall recognize and promote the following principles when preparing any policies, plans, programs, processes, or desired

outcomes relating to federal lands and natural resources on federal lands pursuant to this section:

(ii) multiple-use and sustained-yield management means that federal agencies should develop and implement management plans and make other resource-use decisions that:

(D) are designed to produce and provide the desired vegetation for the watersheds, timber, food, fiber, livestock forage, and wildlife forage, and minerals that are necessary to meet present needs and future economic growth and community expansion without permanent impairment of the productivity of the land.

Effects of Backcountry Management areas on Recreation

Page 71 of the DEIS states that: *"In general, watersheds with more than 1 mile of road per square mile can be considered to have moderate to high road density (Forest Service 2011c)."*

The state disagrees with this general consideration regarding road density. If a road were 20 feet wide, a mile of road would occupy 105,600 square feet or 2.42 acres of a 640-acre square mile. This is only .00378 percent of a square mile occupied by roads, which is hardly a moderate to high road density.

Page 211 of the DEIS states that… *"Recreation experience—As under alternative B, alternative C would include the establishment of recreation management areas. Under alternative C, however, recreation emphasis would focus on expanded backcountry management areas and further restrict motorized use in these areas. This alternative also has the most acres set aside as proposed wilderness, and it includes additional stream segments managed as suitable for inclusion in the NWSRS."*

This reduction of motorized recreation opportunities under alternative C in favor of additional wilderness and backcountry management areas would be inconsistent with adopted state and local resource management plan policies associated with motorized recreation as follows:

Duchesne CRMP, page 244

*Public land agencies shall limit OHV's to trails, roads, or areas specifically designated by the agency for that purpose. However**, the availability and mileage of such trails should be expanded to meet demand** and provide OHV loops that connect communities. Open area riding as well as looped and stacked trail systems should be offered, with a variety of levels of trail difficulty.*

Duchesne CRMP, page 247

In accordance with Utah Code 63J-8-104(g), federal land management agencies shall achieve and maintain traditional access to outdoor recreational opportunities available on federal lands as follows:

> *Hunting, trapping, fishing, hiking, camping, rock hounding, OHV travel, biking, geological exploring, pioneering, recreational vehicle camping, and sightseeing are activities that are important to the traditions, customs, and character of the county and should be allowed to continue.*

Duchesne CRMP, page 248

> *Existing levels of motorized public access to traditional outdoor recreational designations in the county must be continued, including both snow machine and OHV use, in areas where resource damage is unlikely to occur.*

Utah SRMP, page 185

> *§ 63J-8-104. State land use planning and management program*
>
> *(g) achieve and maintain traditional access to outdoor recreational opportunities available in the subject lands as follows:*
>
> *(i) hunting, trapping, fishing, hiking, family and group parties, family and group campouts and campfires, rock hounding, OHV travel, geological exploring, pioneering, recreational vehicle parking, or just touring in personal vehicles are activities that are important to the traditions, customs, and character of the state and individual counties where the subject lands are located and should continue.*

Effects of Backcountry Management areas on Timber Industry

Page 245 of the DEIS states that: *"Under alternative C, there would be an emphasis on management of recreation areas to improve the backcountry experience for recreationists, unlike under alternative A. This management would increase the acreage of backcountry management areas and would prohibit timber harvest within them. This would result in the decreased number of acres suitable for timber production and harvest."*

Reduction of lands suitable for timber harvest in favor of backcountry management areas would be inconsistent with adopted state and local resource management plan policies, (see policies previously listed under "Effects of Wilderness Management on the Timber Industry)."

Effects of Alternatives B and C and special designations on Grazing

Page 18 of the DEIS states that: *"Under alternative B, forage for livestock grazing would have specific utilization levels included in management (50 percent) as well as 4-inch stubble height guidelines to provide criteria to help meet desired conditions for terrestrial vegetation."*

Establishing one-size-fits-all utilization levels and stubble height guidelines is inconsistent with the state and county resource management plans. If exceptions or on-site modifications are allowed under Alternative B, please indicate here. A more flexible, adaptive management approach, such as proposed in Alternative D, accounting for range conditions at site-specific locations, should be used to meet desired conditions.

Pages 210-211 of the DEIS state that: *"An alternative assumption (that all affected pastures would be closed and not proportionally reduced) would result in a larger reduction of HMs—a loss of 3,318 HMs—and a small, but measurable, impact on the regional economy. Whether the entire pastures would be closed would depend on whether the management areas could be managed to restrict cattle (for example, with fencing, natural barriers, or herding). The closure of these allotments would result in an estimated loss of 7 jobs and $120,000 in labor income on an average annual basis. This would result in the lowest estimated HMs of all alternatives and the lowest level of economic effects, in terms of jobs and income related to livestock grazing."*

Pages 251-252 of the DEIS state that: *"The most likely impact from management of recommended or designated wilderness would be alterations to the timing and intensity of grazing operations to meet desired conditions to maintain wilderness character. Other potential impacts on grazing management due to recommended or designated wilderness include impacts to access of allotments for maintenance of structural range developments, the ability to haul salt and minerals, and the retrieval of sick animals due to restrictions on motorized use."*

Page 253 of the DEIS states that: *"Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches unless monitoring indicates a different level sufficient to meet and maintain desired conditions (table 3-68). In areas where these guidelines are not met and exceptions are not made, there could be modifications to the timing and intensity of grazing operations, particularly adjustments to livestock numbers or season of use, or both, and associated reductions in numbers and season of use permitted to grazing operators, when compared with alternative A."*

Page 254 of the DEIS states that: *"Under alternative C, forage for livestock would be limited to a level of 40 percent utilization and a stubble height of 4 inches (table 3-71). Exceptions will not be made for utilization levels and stubble-height guidelines."*

The one-size-fits-all utilization and stubble height standards and restricting the timing and intensity of grazing in favor of increased areas managed to maintain wilderness characteristics under Alternatives B and C (see previous four references above) is inconsistent with adopted state and local resource management plan policies listed below. The flexibility in Alternative D is preferable.

Daggett CRMP, page 29:

> *When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.*

Daggett CRMP, page 31:

> *Grazing on national forest land should be tied to historic levels and healthy forest conditions. AUMs should be maintained; vacant allotments should be actively restocked.*

Daggett CRMP, page 39:

> *Daggett County opposes the reduction, relinquishment, or retirement of grazing AUMs in favor of conservation, wildlife, and other uses.*

Uintah CRMP, page 20:

> *When sustainable and based on scientific knowledge and local data, increase grazing (allotments, AUMs, or seasonal use) to reduce fuel loads.*

Uintah CRMP, page 24:

> *When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.*

Uintah CRMP, page 38:

> *The county opposes the reduction, relinquishment, or retirement of grazing AUMs in favor of conservation, wildlife, and other uses.*
>
> *Land management plans, programs, and initiatives should provide the amount of domestic livestock forage, expressed in AUMs, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of AUMs sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.*

Duchesne CRMP, page 34

> *BLM and Forest Service land use plans should produce planning documents consistent with state and local land use plans to the maximum extent consistent with federal law and FLPMA's purposes, by incorporating the state's land use planning and management program for the subject lands that preserve traditional multiple use and sustained yield management on the subject lands to:*
>
> 1. *Achieve and maintain in perpetuity a high-level annual or regular periodic output of agricultural, mineral, and various other resources from the subject lands;*
>
> 2. *Support valid existing transportation, mineral, and grazing privileges in the subject lands at the highest reasonably sustainable levels;*

Duchesne CRMP, pages 97-100

> *Consistent with the state laws associated with grazing on federal lands, it is the position of Duchesne County that:*
>
> *Well managed livestock grazing, though poorly understood by the average citizen, is the most effective way to manage vegetation on a large scale to benefit watershed health and preserve wildlife habitat.*
>
> *Improving grazing management on Duchesne County's private and public lands should be viewed as a long-term priority.*
>
> ***Public lands shall be managed to maintain or increase forage allocation for livestock grazing**. Annual monitoring should be done to verify whether desired conditions are being maintained.*
>
> ***Public land agencies shall maintain livestock grazing permits and grazing allocations at present levels** unless a study of rangeland conditions justifies increased or decreased grazing. The county recognizes that drought, wildfire, and other factors may affect the terms of grazing permits.*
>
> ***The County opposes the reduction, relinquishment, or retirement of grazing animal unit months in favor of conservation, wildlife, and other uses.** Any decreases should be temporary in nature due to ever-changing range conditions. The county expects the Utah Division of Wildlife Resources to coordinate with land management agencies as they manage forage and grazing allotments for the benefit of livestock and wildlife populations.*

Land management plans, programs, and initiatives should provide that the amount of domestic livestock forage, expressed in animal unit months, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of animal unit months sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.

The County favors the best management practices that are jointly sponsored by cattlemen's, sportsmen's and wildlife management groups such as chaining, logging, seeding, burning, and other direct soil and vegetation prescriptions that are demonstrated to restore forest and rangeland health, increase forage, and improve watersheds in grazing districts and allotments for the mutual benefit of domestic livestock and wildlife. When the practices described above increase a grazing allotment's forage beyond the total permitted forage use that was allocated to that allotment in the last federal land use plan or allotment management plan still in existence as of January 1, 2005, a reasonable and fair portion of the increase in forage beyond the previously allocated total permitted use should be allocated to wildlife as recommended by a joint, evenly balanced committee of livestock and wildlife representatives that is appointed and constituted by the governor for that purpose. The County favors quickly and effectively adjusting wildlife population goals and population census numbers in response to variations in the amount of available forage caused by drought or other climatic adjustments, and state agencies responsible for managing wildlife population goals and population census numbers will give due regard to both the needs of the livestock industry and the need to prevent the decline of species to a point where listing under the terms of the Endangered Species Act when making such adjustments.

Access to public rangeland is a valid existing right that is vital to the permit-holders and the land management agency for planning, management, and development. Access shall be maintained open and shall be improved as management needs require.

Reductions in domestic livestock animal unit months must be temporary and scientifically based upon rangeland conditions. Reductions in AUMs should be allocated on a species basis [wildlife, wild horse, wild burros & livestock] with a percentage allocated to each species type. The only justification for decreasing domestic livestock grazing AUM's is for there to be a valid and documented scientific finding that the range district will no longer support the AUM's in question. The BLM and Forest Service are expected to comply with and honor the domestic grazing preference on grazing districts. Likewise, the permittee is also expected to abide by the terms and conditions identified in the grazing permit.

Federal policies, plans, programs, initiatives, resource management plans, and forest plans may not allow the placement of grazing animal unit months in a suspended use category unless there is a rational and scientific determination that the condition of

the rangeland allotment or district in question will not sustain the animal unit months sought to be placed in suspended use. Any grazing animal unit months that are placed in a suspended use category should be returned to active use when range conditions improve.

Federal policies, plans, programs, and initiatives related to vegetation management should recognize and uphold the preference for domestic grazing over alternate forage uses in established grazing districts while upholding management practices that optimize and expand forage for grazing and wildlife in conjunction with state wildlife management plans and programs in order to provide maximum available forage for all uses. In established grazing districts, animal unit months that have been reduced due to rangeland health concerns should be restored to livestock when rangeland conditions improve and should not be converted to wildlife use.

Management decisions shall be based on the individual range allotment condition *and not on the overall condition of surrounding lands. Increases in available forage resulting from the conservation practices of livestock permit-holders shall not be allocated or credited to other uses.*

Changes in season of use or forage allocation must not be made without full and meaningful consultation with permittee. The permittee must be the first point of contact.

The continued viability of livestock operations and the livestock industry shall be supported on federal and state lands within Duchesne County by management of the lands and forage resources and the optimization of animal unit months for livestock *in accordance with the multiple-use provisions of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et seq., the provisions of the Taylor Grazing Act of 1934, 43 U.S.C. 315 et seq., and the provisions of the Public Rangelands Improvement Act of 1978, 43 U.S.C. 1901 et seq.*

Utah SRMP, page 149

The State of Utah supports the concept of multiple-use and sustained yields on public lands. Livestock grazing is an integral part of the multiple-use concept. Reductions of livestock numbers through frivolous lawsuits and barriers to infrastructure improvements and maintenance necessary for effective grazing management are unacceptable.

Utah SRMP, page 140

The state of Utah adopts a no-net-loss stance concerning grazing AUMs on federal lands.

Page 255 of the DEIS states that*: "Alternative C would have the highest percentage of the Ashley National Forest managed as designated areas; however, none of the acreage of the proposed designated areas overlapping current grazing allotments would preclude grazing. Some impacts may occur, however, related to the ability to access and maintain allotments in proposed wilderness areas, as described under "Environmental Consequences for Livestock Grazing Common to All Alternatives.""*

Although grazing would not be precluded in new designated areas under Alternative C, the restrictions on the ability to access and maintain allotments in proposed wilderness areas would be inconsistent with state and county resource management plan policies listed above.

Effects of Alternatives B and C Scenery Requirements on Utilities and Infrastructure

Page 273 of the DEIS states that: *"The prohibition of new communication sites, roads, utility corridors, and other infrastructure in recommended wilderness areas would be the same as described under alternative B; however, recommended wilderness would occur over a greater area of the national forest. This would constitute 50,200 acres under alternative C, compared with 10,300 under alternative B. Any maintenance to dams, bridges, and administrative and drinking water facilities would require methods designed to ensure preservation of wilderness values. This would result in increased maintenance costs associated with compliance."*

Another reason that alternative C is not acceptable to state and local governments is the increased costs of maintaining water infrastructure in wilderness areas or wilderness study areas. For example, recent stabilization of a high mountain lake in the High Uintas Wilderness cost some $600,000 more than it normally would have due to the requirement to airlift equipment to the job site by helicopter.

Page 296 of the DEIS states that: *"Under alternative C, SIO acres would be assigned to the forest, as shown in table 3-84 (see figure 2-10). Alternative C would increase the number of acres in areas where the management emphasis would maintain or enhance the valued scenic character. This is because 74 percent of the lands would have high or very high SIOs, compared with 51 percent under alternative A."*

This high percentage of high or very high SIO's under alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with state and county resource management plans policies set forth in this letter, including the provision of utilities and infrastructure, such as communication towers and transmission lines needed to serve a growing population and a growing renewable energy power grid.

Page 297 of the DEIS states that: *"Every 5 years, the Forest Service would consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternative A."*

If the need for an easement arose, a proponent should not have to wait for the beginning of the next 5-year review period before such easement could be considered. The annual review in alternative D is preferable for flexibility in responding to easement requests.

Page 299 of the DEIS states that: *"Therefore, when combined with the impacts described above from reasonably foreseeable future actions, alternative C would have the fewest cumulative impacts on the scenic character."*

While alternative C would preserve scenic character to the greatest degree, this high percentage of high or very high SIO's under alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with state and local resource management plan policies contained in this letter.

Page 304 of the DEIS states that: *"Recent increased activity in large transmission projects, such as the Zephyr, Energy Gateway South, and Transwest Express projects, demonstrates that along with increased interest in communication uses and technologies, the demand for enhanced energy infrastructure and electrical connectivity is on the rise and is expected to increase."*

The high percentage of high or very high SIO's under alternative C would likely impact the ability of the Ashley National Forest to accommodate these increasing demands for energy transmission infrastructure to the detriment of clean energy development and reliability of the power supply in the western grid.

Utah Department of Agriculture and Food

Stubble Height and Utilization Rate Studies

The Forest Service and BLM commissioned at the University of Idaho Stubble Height Review Team in 2003 to review the use of these standards. Subsequently, direction was given to both BLM and Forest Service in 2005 to modify wording in Annual Operating Plans (Bureau of Land Management 2005, K. Lynn Bennett to Idaho District Managers; USDA Forest Service 2005a, Jack Troyer to Region 4 Forest Supervisors; USDA Forest Service 2005b, Harv Forsgren to Region 3 Forest Supervisors).

"*Agencies should modify the wording in permits and Land Use Plans to use stubble height criteria, not as a compliance standard, but as:*

1) a "trigger" to assess when livestock should be moved from a grazing unit;

2) an annual "prompt" to investigate and assess the riparian resource condition." (Cleary et al. 2008).

The following documents review the science these recommendations are based upon:

WCC 1998, Utilization Standards Report (Oregon State Univ. Exp. Sta. Bull 682, 1998)

A symposium was held during the 1997 SRM annual meeting inviting Range researchers and Agency Administrators to evaluate Utilization Standards. The two sponsoring Western Coordinating Committees (WCC 40 Rangeland Ecological Research and Assessment, WCC 5 Rangeland Resource Economics and Policy) were concerned that utilization estimates often are used incorrectly in making rangeland management decisions.

- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb682.pdf#page=7

Sanders (1998) and Sharp et al. (1994) thoroughly reviewed the history and use of Utilization standards. Sanders concluded utilization standards should not be used as goals or objectives in allotment management plans. Emphasis should be placed on monitoring long-term trend on both uplands and riparian areas. Utilization and stubble height information could be used as management tools to determine when to move out of a pasture.

- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb682.pdf#page=7 (page 3)

Smith (1998) reviewed the seasonal effects of defoliation. He concluded Utilization Standards of individual species has little or no relevance to the subsequent growth or reproduction of the plant unless the phenological stage of growth when use occurs is specified. Timing of use has more impact than the amount of use.

- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb682.pdf#page=7 (page 9)

Rasmussen (1998) presented data that showed no significant correlation between yearly utilization and long-term trend. He reported research from Cook (1966) and Olsen and Richards (1989) that showed phenological stage of plant growth when grazed is more important than degree of use in determining subsequent growth and vigor of a plant. Early-season (vegetative stage) and late-season (seed ripe) heavy use had little long-term impact on plant production. Rasmussen concluded that utilization is not very useful in determining the relationship between management and long-term trend of rangelands.

- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb682.pdf#page=7 (page 25)

Laycock (1998) reviewed studies on the accuracy of utilization methods. He reported both the ocular estimate by plot and the caged/open clipped plot methods overestimate utilization by 30% or more. Differences among individuals, even trained observers, are very high. Utilization between years varies in proportion to the annual production, which is determined by precipitation, and thus cannot be relied on to establish a trend or pattern. He concluded the accuracy and precision of utilization estimates are not very high, and at best should be used as an index of use, not an exact figure.

- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb682.pdf#page=7 (page 17)

Krueger (1998) summarized the main points of the symposium. He listed the concerns of the scientists about agency administrators applying utilization methodologies in inappropriate ways, either in the context of using them as management objectives, or by misapplication of the methods. The prominent area of agreement was that **utilization is a land management tool** (to be used in determining when to move to a new pasture), **not a land management objective**. The most accepted use of utilization techniques is to develop large-scale utilization maps to highlight areas of livestock concentration and low use. Management strategies could then be used to improve livestock distribution to even out utilization. If numbers are collected as part of the monitoring program, they always should be statistically analyzed so the decision maker knows the quality of the information.

- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb682.pdf#page=7 (page 71)

Stubble Height Review Team (Rangelands, Feb 2006, p.23-28; Rangelands Aug 2008, p.37-39; Univ. ID Exp. Sta. Contribution No. 986) A Review Team was commissioned in 2003 by BLM Idaho State Director K. Lynn Bennet and Intermountain Region 4 Forester Jack G. Troyer to evaluate the use stubble height standards for Allotment Management Plans (Stubble Height Review Team, 2006). Each administrator sent out memos adopting and implementing the review team recommendations (Bureau of Land Management, 2005), (USDA Forest Service, 2005a). Southwest Region 3 Forester Harv Forsgren also issued an instruction memorandum to implement these findings (USDA Forest Service, 2005b).

- https://journals.uair.arizona.edu/index.php/rangelands/article/download/12133/11411

The Review Team found, "*Unfortunately, the linkages between stubble height and riparian functions have had limited experimental examination…Stubble height as an annual indicator of grazing use in riparian areas should only be used in combination with longer-term monitoring of vegetation and channel parameters*."

"Although stubble height is easy to use, it is not a resource objective and therefore inappropriate as a prescriptive standard in grazing permits and land use plans. It should be used as a guideline or indicator for changing annual management in Annual Operating Instructions/Plan… It could be used as a trigger for when livestock should be moved from the grazing unit."

"To properly manage the grazing operation, the current condition and trend of the long-term riparian management objectives would be compared with the desired condition of those objectives to assess the need to adjust grazing use."

"Agencies should modify the wording in permits and Land Use Plans to use stubble height criteria, not as a compliance standard, but as 1) a "trigger" to assess when livestock should be moved from a grazing unit; and 2) and annual "prompt" to investigate and assess the riparian resource condition."

Burkhardt 1997 Riparian Grazing Strategy

Agency administrators have based grazing management decision solely on achieving predetermined use levels at "key sites". This approach may provide simple and efficient "grazing administration", but it does not result in effective "grazing management "Utilization standards are not an appropriate substitute for "on the ground management" combined with objective monitoring of resource trends. The degree of defoliation is not singularly and linearly related to plant health. Proper season of use and rest are far more effective for dealing with most riparian grazing problems than are use limits.

Proposed Grazing Strategies in Riparian Areas

Large Meadow Systems: Early season grazing and hot season rest or summer use rotation. Large meadow complexes should be used and managed independent from the surrounding uplands.

Narrow Wooded Stream Bottoms within mountain canyons:

These are concentration areas and enforcement of conservative use limits cannot effectively be accomplished. Apply cool season or early grazing and hot season rest or rotation. Develop upland water sources and herding to remove animals from bottoms.

Upland Springs:

Fence and pipe a portion of the water to upland water troughs.

- https://journals.uair.arizona.edu/index.php/rangelands/article/view/11328/10601

Division of Water Quality

DWQ also oversees the classification, protection, and remediation of the waters of the state (Clean Water Act (CWA) §304 and Utah Code §19-5-110). DWQ's responsibilities include development of water quality standards, water quality monitoring and assessment, development of total maximum daily load plans (TMDLs) to restore impaired waters to their designated beneficial uses, issuance of Utah Pollution Discharge Elimination System (UPDES) discharge permits, issuance of CWA §401 water quality certifications for federal licenses or permits (including U.S. Army Corps of Engineer's CWA §404 Permits), and the implementation of nonpoint source projects to improve water quality.

Watersheds

The Ashley National Forest is an important source of high-quality water for local and regional ecosystems, recreational activities, fisheries, irrigation, and drinking water. Sound management of the watershed through the Revised Forest Plan will ensure that these resources continue to provide multiple benefits to the region and the state. The management direction proposed in the DEIS to "(incorporate) forest-wide desired conditions, standards, and guidelines that together provide more detail and clarity regarding the conditions and management of watersheds that would contribute to the overall goal of maintaining the integrity and resilience of watersheds and riparian, wetland, and fen vegetation communities on the national forest" supports water quality and watershed health (pg. 74).

DWQ supports the desired watershed conditions identified in the Ashley National Forest Land Management Plan (Appendix E, Chapter 2, pg. 13-14). Healthy, resilient watersheds provide clean water for downstream communities, help waterways meet their designated beneficial uses (see UAC R317-2-6), protect water quality and public health, and provide ongoing benefits from multiple use of forest resources.

The DEIS identifies nonpoint source (NPS) pollution as a primary source of water pollution on the National Forest (pg. 55). The DWQ agrees that NPS pollution poses a threat to water quality and supports the use of management guidance and best management practices (BMPs) to reduce NPS pollution in the forest.

According to the Watershed Condition Framework (WCF) referenced in the DEIS, fifty-three percent (53%) of the watersheds in the forest are functioning properly, while forty-seven percent (47%) are functioning at-risk. The DEIS notes that "the distribution of overall scores indicate that seventy percent (70%) of watersheds scored near the break between properly functioning and functioning at-risk watershed condition. *Changing one or more attributes could shift the classification one way or another, indicating opportunities to improve watershed condition but also degrade watersheds through mismanagement"* (emphasis added) (pg. 52). It is important that Forest Plan guidance and management ensures

watersheds are functioning properly and their conditions are improving rather than degrading.

The DEIS notes that "(f)or the Ashley National Forest, watershed vulnerability to climate change is considered moderate to high…Watersheds functioning at risk are more vulnerable to climate change effects. This is due to the impaired function of terrestrial physical processes, including high road densities and poor road and trail conditions" (pg. 59). The Forest Service should prioritize maintenance or relocation of roads and trails to prepare for an influx in travel and ensure the continued health of forest watersheds.

The three priority watersheds identified in the plan (Cart Creek, Wolf Creek, and Whiterocks River) align well with DWQ's objectives to restore impaired waters and protect existing water quality resources. Cart Creek and the West Fork Duchesne River are waterbodies within the forest that are on the 303(d) impaired list, and Ashley Karst National Recreation and Geologic Area and Flaming Gorge Reservoir are important water resources. DWQ looks forward to working with the Forest Service on restoration work in these priority watersheds.

Aquatic Ecosystems

DWQ agrees with the DEIS that "(t)he diverse ecosystems of the Ashley National Forest are a key component to supporting and maintaining its social and economic values. Functioning and resilient terrestrial and aquatic ecosystems contribute to healthy forests and rangelands, abundant fish and wildlife, healthy watersheds and abundant water supplies, beautiful landscapes, and a variety of other ecosystem services" (Appendix E, pg. 7).

Aquatic life is an important beneficial use for rivers and streams in the Ashley National Forest. These waters provide spawning and rearing habitat for rainbow, brown, and brook trout and the macroinvertebrates that support them. Fish passage connectivity ensures adequate habitat through fish life cycles. Management goals and objectives in Alternative B and the Draft Revised Management Plan (Appendix E) for adaptive and proactive management of riparian areas; habitat connectivity from headwaters to downstream areas; management and treatments that reduce nonpoint source pollution to waterways from sediment and animal waste; conifer removal to prevent encroachment on wet meadows in upland areas; stream channel restoration to restore aquatic habitat, reduce elevated stream temperatures, and increase bank stability; and the use of beavers to reestablish healthy river ecosystems will support healthy aquatic life and the proper functioning of aquatic ecosystems.

Soils

Healthy soils are integral to healthy rivers and streams. Forest management that prevents soil erosion protects stream channels, riparian areas, and the habitat required to support aquatic life beneficial uses.

Fire and fuels treatments can help reduce the risk of soil erosion from wildfires, enhance water yields from watershed, and treatment strategies that protect soils also protect water quality. For example, the proposed guidelines to leave coarse, woody debris over portions of the plan area will support soil stability and reduce the erosion potential after treatment. Other guidelines for vegetation and timber management that limit soil disturbance to no more than fifteen percent (15%) of the area from cumulative activities and encourage mitigation measures if the disturbance exceeds this limit will help reduce soil erosion into waterways. Management decisions to avoid activities that increase soil compaction on steep slopes and sensitive areas (such as riparian areas, wetlands, and seeps, and erodible soils) protect water quality by reducing sedimentation in rivers and streams.

Fire

According to the WCF, ninety percent (90%) of watersheds in the Ashley National Forest had fair scores for the fire regime, indicating an increased potential for high-intensity wildfires that may affect the overall watershed condition. The proposed risk management approach in the DEIS promotes resilient landscapes that protect water yields, water quality and water resources. Collaborative planning through programs like Shared Stewardship can create fire-adapted ecosystems across public and private lands in, and adjacent to, the forest. DWQ supports the use of fire and fuel treatments in a manner that reduces the risk of uncontrolled wildfire while protecting water yields, water quality and watershed health and resilience.

Recreation and Roads

The focus in Alternative B on recreation management will offer users a variety of developed and dispersed recreation opportunities in the forest. However, the DEIS acknowledges that the proposed increase in recreation management increases the potential for soil compaction, displacement of sensitive soils, and erosion, all of which could harm the proper functioning of wetlands and the water quality of rivers and streams in the plan area. Recognizing the potential negative impacts of increased travel on motorized routes, the Forest Service should take steps to protect those watersheds that rate either fair or poor on the roads and trails indicator for the WCF score. (85%). DWQ recommends the Forest Service consider the potential for increased sediment, higher stream temperatures, and decreased vegetative cover while choosing an alternative that can also accommodate increased travel and recreation.

The Forest Service should give special consideration to those watersheds that may be at risk if there is a dramatic increase in road density following the expansion of the forest trail systems. According to the plan components in Alternative B, the Forest Service would avoid wetlands and unstable areas, consider impacts on streams when reconstructing or constructing new roads, reduce impacts on watershed condition from any new roads or trails, and not appreciably reduce WCF scores for the roads and trails condition indicator. DWQ anticipates that the Revised Forest Plan will include details about or references to

maintaining water quality and wetlands from the potential impacts of new and existing roads and trails.

Grazing

As was noted in the DEIS, livestock and ungulate grazing can impact riparian and wetland ecosystems and can adversely and directly affect water quality (pg. 69-70). Streambank erosion from livestock and ungulate grazing can contribute to sedimentation, turbidity, and stream channelization. Loss of riparian vegetation can increase stream temperatures to levels that stress aquatic life. Nutrient loading to streams from livestock and ungulate waste and organic matter can increase algal growth and ammonia concentrations and decrease dissolved oxygen levels. These nonpoint source pollutants can impact aquatic species and their habitat and impair streams for their designated beneficial uses. Successful partnerships between the State and U.S. Forest Service such as the Grazing Improvement Program led by the Utah Department of Agriculture and Food can help protect water quality by developing new water sources for use by livestock and ungulates and reduce impacts on streams and riparian areas. The U.S. Forest Service should continue to work with the State on implementation of such programs to improve water quality while also supporting continued livestock production and big game hunting on the Ashley National Forest.

The proposed establishment of riparian management zones (RMZs) would help mitigate impacts to riparian areas from livestock and ungulate use. The flexibility in the proposed plan to allow adjustments for site-specific conditions could be used to manage livestock and ungulate use of riparian areas experiencing water quality issues. The Forest Service could identify potential conflicts through a grazing-RMZ crosswalk between grazing allotments and riparian area usage. The crosswalk could serve as a management tool/early warning system to protect riparian areas and water quality through adjustments to grazing levels/timing/duration in RMZs.

DWQ recognizes that well-managed grazing is an important tool to manage vegetation that, if left un-managed, will increase fuel loads that result in uncharacteristic wildfire that will have negative impacts on water quality.

Timber Harvesting

Timber harvesting is an important multiple use of the forest, and a certain number of trees and other vegetation must be removed in watersheds to reduce fuel loads and enhance the supply of water produced by watersheds. However, timber harvesting, and vegetation treatments can also compromise hydrologic function and increase erosion if conducted in steeply sloping areas. When identifying areas as suitable or not suitable for timber production, the Forest Plan should take into consideration the impact of timber harvesting/thinning on watershed health and water quality. Harvesters should take soil stability and degree of slope into consideration when operating to maintain soils and water quality and prioritize the use of existing roads whenever possible.

Operations should utilize existing roads wherever possible, minimize construction of new roads, and site and design new roads in a manner that reduces erosion and impacts to water quality. The proposed plan notes that areas deemed suitable for timber production could impact springs and seeps, and soils would be vulnerable to soil compaction, displacement, and erosion from equipment. A crosswalk between areas identified as suitable for timber harvest and the guidelines to protect waterbodies, soils, and watersheds (Appendix E, Ashley National Forest Plan, Chapter 2, pg. 45) would help ensure that adverse impacts to water quality are kept to a minimum, while providing for timber harvest necessary to maintain sufficient water yields.

Relevant Water Quality Rules and Reports

Recent DWQ actions relevant to Forest Plan implementation are provided here for reference:

1. Headwaters Numeric Nutrient Criteria Rule (R317-2-14)
The Headwaters Numeric Nutrient Criteria Rule (2020) is applicable to all Category 1 and Category 2 streams in the Ashley National Forest for Recreation (Classes 2A and 2B) and Aquatic Life (Classes 3A, 3B, 3C, and 3D (1))

2. 2018/2020 Combined Integrated Report
The 2018/2020 Integrated Report (IR) was approved by EPA in 2021. This IR contains the latest 303(d) list and TMDLs within the National Forest. The Draft 2022 Integrated Report will be sent to EPA for approval in January 2022.

DWQ values its good working relationship with Forest Service managers and staff and looks forward to continued coordination and collaboration during finalization of the DEIS and implementation of projects and activities under the final plan. Please feel free to contact Jodi Gardberg, Manager, Watershed Protection Section, at jgardberg@utah.gov with any questions.

Conclusion

The State appreciates the opportunity to provide comments and looks forward to continually working with the Forest Service to ensure the development of the Ashley National Forest land use plan revision has integrity and fulfills the multiple-use and sustained-yield mandate of public lands. Please direct any written correspondence to the Public Lands Policy Coordinating Office at the address below or call to discuss any questions or concerns.

Sincerely,

Redge B. Johnson
Executive Director

Technical Comments

The remainder of our comments focus on sections of the DEIS where corrections are needed, or additional statements should be added to the analysis or conclusions. Text shown in **bold**, **<u>underlined type</u>** indicates text that should be added to the DEIS. Text in **bold type** indicates state suggestions for improvement of the DEIS or reasons for the edits suggested. Text that is overstruck should be removed from the DEIS. The state believes that these edits will better inform the decision maker of the implications of the various alternatives and lead to a better result. These comments are as follows and are listed by DEIS page number:

Page

S-1 The Forest Service has prepared this draft environmental impact statement (**<u>D</u>**EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and state laws and regulations.

1 The Forest Service has prepared this **draft** environmental impact statement **<u>(D</u>**EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and state laws and regulations.

2 Typical uses and activities include land- and water-based recreation (such as camping, hiking, boating, and all-terrain vehicle [ATV] **or off-highway vehicle [OHV]** riding),

2 Portions of the Forest are within the original Uintah and Ouray Indian Reservation. Local Native American tribes value the lands on the Ashley National Forest for hunting and gathering, ceremonial and traditional uses, and ancestral connections. **This text is repetitive of text appearing earlier on the page and should be deleted.**

5 NEPA requires the Forest Service to coordinate planning with other Federal agencies that have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (see 40 CFR 1501.8+. **Should be (see 40 CFR 1501.8).**

7 Chapter 1. Purpose of and Need for Action: ~~The~~ **This** chapter includes information on the history of the project proposal, the purpose of and need for the project, and the agency's proposal for achieving that purpose and need.

7 This chapter summarizes the information used to compare alternatives **and** contains the detailed basis used to measure the potential environmental consequences of each alternative.

11 ~~Issues~~ **Commenters** brought up the need to identify high-risk areas for wildfire and employ a variety of methods to treat fire.

16 For livestock grazing, forage utilization and stubble height under alternative A would be determined based on site specific conditions to meet land health standards and based on individual AMPs and permit terms and conditions. **The acronym "AMP" should be included in the list of acronyms on Pages vii - viii of the DEIS**.

18 Management under alternative B would also support the maintenance and improvement of resilient ecosystems and watersheds to support wildlife diversity; it would provide ecological conditions to maintain a viable population of each SCC **and common and abundant species** within the plan area ~~and common and abundant species~~.

18 Specifically for bighorn sheep, management has been included to limit authorization of new permitted domestic sheep or goat allotments unless separation from domestic sheep and goats can be demonstrated, or research **and consultation with state wildlife management agencies** indicates that the potential for pathogen transfer would be limited.

19 Increased restrictions on resources uses, such as timber, would support ecosystem services associated with clean water~~, including municipal water supplies~~**. Restricting timber harvest may enhance water quality but would likely reduce the quantity of water produced by a watershed, which would negatively impact municipal water supplies.**

19 In addition, when domestic ~~sheet~~ **sheep** or goat grazing permits are voluntarily waived without preference, and if the allotment does not provide separation from bighorn ~~sheet~~ **sheep**, the allotments would be closed to provide separation between domestic sheep and goats and bighorn sheep.

24 Table 2-2 and Pages 207, 210, 247, 249, 250, 251, 252: **The acronym "HMs" is not listed in the acronyms listed on Pages vii-viii of the DEIS.**

25 Table 2-2, Alternative B: New domestic sheep or goat allotments would not be authorized unless separation from bighorn sheep can be demonstrated, or research demonstrates the risk of pathogen **transfer** can be avoided or is no longer an issue…

31 … (particulate matter less than 10 microns in diameter [PM10] and particulate matter less than 2.5 microns in diameter [PM2.5]). **In the definition of acronyms on Page viii, the term "micrometers" is used rather than "microns" in defining particulate matter**.

32 The State of Wyoming does not have predefined smoke management airsheds (Forest Service 2017b). **This text seems contrary to the text in Footnote #1 on this page**.

32 …a 70-acre portion the Ashley National Forest north of Vernal is at the ~~northwest~~ **northeast** extreme of this nonattainment area boundary. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest**.

36 The Ashley National Forest is in conformance with each of the NAAQS, except for 70 acres that fall within the ~~northwest~~ **northeast** boundary of the Uintah Basin marginal ozone nonattainment area. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.**

38 Emissions in the 70-acre portion of the Ashley National Forest that lies in the ~~northwest~~ **northeast** boundary of the Uintah Basin marginal ozone nonattainment area would be similar to those that currently occur. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest**.

39 Under all alternatives, vegetation and fuels treatments would be used, **in varying degrees**, to reduce tree density and the quantity of surface fuels and to remove insect-affected trees, which, in turn, lowers the risk of severe wildfire. **Alternative C would rely more on natural processes than active vegetation management.**

45 Erosion is also a disturbance that often occurs secondarily **because of** changes to the soil surface.

48 Soil quality in these areas can be expected to be maintained or altered depending on the management of recreation and livestock grazing impacts. **Fire and fuels management (or the lack thereof) also has a significant impact on soil quality in special designation areas. Focusing solely on recreation and grazing impacts could be interpreted as being bias against those activities**.

51 Under Alternative B, two **additional** areas covering 10,300 acres would be managed as wilderness with 230 acres identified as potential wetlands.

53 This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height ~~exceeds~~ **exceeding** 4 inches **is rare**.

60 Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory from livestock and wild ungulates, fire suppression, roads, and motorized recreation. **Non-motorized recreation can also affect stream dynamics and hydrology, such as non-motorized trail improvements near streams. Failure to list that stressor could be interpreted as showing bias for non-motorized recreation and against motorized recreation.**

60 At higher elevations in the Uinta Mountains, these include a glacial lake, potholes, kettle ponds, and beaver ponds. **There is only one glacial lake? Page 64 indicates there are many.**

61 Harmful algal blooms have been observed periodically in the upper reaches of Flaming Gorge Reservoir ~~on~~ **in** or near the plan area.

61 The area includes a portion of the Ashley National Forest encompassing the Duchesne-Roosevelt Ranger District and portions of the Vernal Ranger District within the Whiterocks River drainage that is within the original treaty boundary of the Uintah and Ouray Ute Indian Reservation (Indian Country). **Please provide a map of what is considered "Indian Country" by the EPA.**

62 There are 14 pipelines that traverse parts of the Ashley National Forest, three of which are used for electricity generation. **Moon Lake Electric is decommissioning the electricity generation facilities in the Yellowstone Canyon and Uinta Canyon areas, so the associated pipelines will be removed. For more information, contact Pat Corun, Moon Lake Electric, 435-722-5400**.

63 Several municipalities extend their protection areas onto the Ashley National Forest, including the following municipalities in Utah: City of Green River, Duchesne, Whiterocks, Tridell, Vernal, Manila, and Dutch John. **City of Green River, Utah, or Wyoming?**

63 The Ashley National Forest also possesses three subbasin claims, with plans to file for additional claims. The Ashley National Forest holds three subbasin claims; … **Note repetition.**

64 Most vegetation is dominated by herbaceous species, especially **in** the ~~in~~ northern areas of the FGNRA, with high acreage of irrigation-influenced riparian and wetland areas.

66 Conifers are encroaching across elevations on the Uinta Mountains, with 500 acres observed during vegetation mapping (Forest Service GIS 2020). Conifer encroachment is common for the mid- to low elevations and is likely attributed to fire suppression. **500 acres observed versus "common at mid to low elevations" seems inconsistent. Is the 500 acres just at high elevations?**

70 Allotment level assessments conducted over the past decade have identified specific locations where past livestock **grazing** may be a factor that has contributed to water quality impacts (see for example, Goodrich and Huber 2015).

72 These protective plan components would reduce impacts on water quality from surface disturbance, recreation, and motorized and nonmotorized users **but may prohibit certain restoration projects that could benefit water quality in the long term**.

72 This raises the possibility of increased sedimentation, higher water temperatures, and shifts in flood severity or frequency, essentially destabilizing watersheds, **when compared to Alternatives B and D**.

72 The threat of uncharacteristic wildfire would continue and be the highest of all alternatives, **except for Alternative C, which would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment**.

74 The threat of uncharacteristic wildfires would continue and would be the highest under all alternatives **(except for Alternative C)**; the overall watershed condition would be at risk from uncharacteristic wildfires with the potential to reduce overall WCF scores. **Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire**.

76 Recommended wilderness areas include extra protection for riparian and wetland vegetation, including restrictions on surface disturbance, development, and access that would preserve riparian and wetland vegetation and structure in these areas; however, restrictions on restoration **and fuels management** in recommended wilderness could affect the Forest Service's ability to improve **and protect** these riparians, wetlands, and possibly fen communities.

77 Alternative B would include plan components that restrict equipment refueling, maintenance, and storage of fuels and other materials in riparian management zones, locating timber roads and infrastructure outside of riparian management zones, and avoiding riparian management zones when ~~construction~~ **constructing** roads and trails with some exceptions.

78 Alternative B would use mechanical treatments and prescribed fire to treat ERUs and move them toward desired conditions**. ERUs is not in the list of acronyms on pages vii and viii**.

79 Impacts on water quality would be reduced, compared with alternative A, from reductions in surface disturbance, restrictions on motorized travel, and a reduction in the concentration of recreation users. **However, areas with special designations rely more on natural processes rather than active fuels management and restoration projects, which can lead to increased risk of uncharacteristic wildfire and resultant negative impacts on water quality from "flood after fire" events**.

80 Alternative C would reduce disturbance from such activities as recreation and mechanical treatments, compared with alternative A; however, additional constraints on restoration treatments could also affect the effectiveness of restoration. **Alternative C would rely more on natural processes, which could leave riparian vegetation at greater risk for uncharacteristic wildfire**.

82 Improper grazing, such as intensive grazing in riparian, wetland, and fen communities may change the vegetation composition by reducing highly palatable plant species while

increasing less palatable plant species, including nonnative and invasive plant species; reduce vegetation cover; diminish plant species richness; and reduce the hydrological function related to the quality and quantity of riparian and green line vegetation. Desired condition plan components common to all action alternatives for riparian areas, livestock grazing, and soil should minimize the potential for adverse impacts related to livestock grazing**. This statement implies that flexible grazing management could lead to improper grazing, which would not be the case if forest service range managers are doing an effective job of managing allotments**.

83 Beyond the Ashley National Forest boundary, past, present, and future actions by other entities, as well as activities associated with rural residential communities, **impact watersheds and aquatic and riparian ecosystems**.

89 Together, these coniferous vegetation types cover about 53 percent of Ashley National Forest lands, with mixed conifer and ~~Engelmann spruce~~ **Lodgepole pine** comprising the largest amounts. **Table 3-14 indicates more acreage of Lodgepole pine than Engelmann spruce.**

93 The most recognized and understood driver of aspen communities is fire. **This sentence occurs twice in the top half of this page (above and below the 3 bullet points).**

93 In persistent aspen stands, ~~Increased~~ **increased** fire frequency would likely reduce the number of older, declining aspen stands and perhaps improve clone vigor and health with more frequent cohort turnover.

93 Due to the limited number of acres of aspen on the Anthro Plateau landtype association, aspen is more susceptible to elk browsing **there** than **in** other aspen-bearing landtype associations.

95 Livestock ~~have grazed~~ **grazing** has occurred in various forms and intensities for more than 100 years.

111 Table 3-18: **Mixed conifer, under Alternative B should be 29,000; not 29,00**.

115 **Prescribed fires** ~~Fires~~ would be mostly low to mixed severity to reduce conifer competition and maintain or improve ponderosa pine composition and structure where burning occurs.

122 Every fire with a resource objective or that escapes initial attack must have a decision in **the** wildfire decision support system.

127 Table 3-27: **Please explain to the reader how a flame length can be less than 0 feet. Perhaps it would be better to use "unburnable" as in Table 3-28?**

131 However, with a greater proportion of managed wildland fire, there would be an increased risk of the unintended outcome/consequence that a fire could escape; this could lead to larger wildfires, habitat and watershed damage, and recreation closures. Depending on the extent of such fires, impacts may persist over the long term. **In addition, Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire. Management direction under Alternative C relies on natural processes, which removes many tools otherwise available to reduce the risk of uncharacteristic wildfire**.

135 The Intermountain Region report indicates between 2005 and 2013, total forest ecosystem carbon in the region increased from 1,069 Tg (teragrams) to 1,084 Tg, (**This information is presented in both paragraphs one and two on this page**).

147-148 Management concerns related to this species include habitat impacts from invasive plant species, climate change, oil and gas development, predation, and livestock grazing (Forest Service 2017a). **Wildfire, whether natural or human-caused, should be considered as one of the major impacts on greater sage grouse habitat**.

153-154 **The analysis assumptions need to address predation of these species, which is one of the major stressors**.

160 This is because designated areas would not receive active natural resource management, and the Forest Service would be unable to ~~purse~~ **pursue** activities such as habitat restoration and enhancement.

165 The area of bighorn sheep CHHR that encompasses timbered stands is not typical bighorn sheep habitat (typically open, alpine areas); however, timber harvest within these atypical areas of CHHR may benefit bighorn sheep by facilitating migration through the timber stands as bighorn sheep move between summer and winter ranges. **The acronym CHHR (Core Herd Home Range) is not listed on Page vii along with other acronyms used in the DEIS.**

167 It should be noted, however, that some of the potential impacts ~~form~~ **from** recreational use may be partially offset by opportunities for long term habitat improvements in destination and general recreation MAs, which would allow for initiation of habitat improvement projects.

171 Included are 9,000 acres of general Rocky Mountain bighorn sheep habitat, 17,500 acres of Rocky Mountain bighorn sheep CHHR, 3,000 acres of greater sage-grouse habitat, 9,100 acres of lynx **peripheral** habitat, …

173 Because fewer acres of Rocky Mountain bighorn sheep, lynx, and fringed myotis habitat would be suitable for timber production relative to Alternative A, these species would experience reduced impacts from tree removal. The benefit to at-risk species, whose habitat is threatened by conifer encroachment (Rocky Mountain bighorn sheep), from fewer acres of habitat suitable for timber production, would be less relative to alternative B. **These two sentences seem to contradict…Rocky Mountain Bighorn Sheep suffer negative impacts from tree removal but positive impacts from removal of encroaching conifers.**

173 All species may benefit from movement of habitat towards desired conditions in areas where vegetation treatments occur, and to a greater extent ~~that~~ **than** Alternative A.

176 Unlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduced habitat features such as forage and cover. **With forage utilization and stubble height determined based on land health standards, this should not translate to reduced habitat features provided that USFS range managers are accurately assessing land/range health**.

176 This is because overall recreation would be higher intensity with more facilities, roads, and other disturbances. (delete the second of two periods)

179 Table 3-44 and associated text: **Is 2020 U.S. Census data available to update this data?**

180 Table 3-45 and associated text: **Is 2020 U.S. Census data available to update this data?**

180 Table 3-46 and associated text: **Updated employment data for counties in Utah should be available from agencies such as the Utah Department of Workforce Services**.

181 Table 3-47 and associated text: **Updated employment data for counties in Utah should be available from agencies such as the Utah Department of Workforce Services**.

182 Table 3-48 and associated text: **Updated average earnings and per capita income data should be available**.

182 Table 3-49 and associated text: **Updated unemployment data is available from the Utah Department of Workforce Services for counties in Utah**.

183 Table 3-50 and associated text: The Ashley National Forest's annual budget (including expenditures and salaries and excluding fire expenditures) was approximately $15.5 million in fiscal year 2017. Approximately 60 percent of the budget was spent on

salaries in fiscal year 2017**. Updated expenditure data should be available for federal fiscal year 2021.**

184 Table 3-51 and associated text. **PILT and SRS data for 2020 and 2021 should now be available.**

184 Footnote to Table 3-51: *Portion of total PILT attributable to National Forest System acres. Additional payments to the analysis area are made as a result of other Federal land management ownership (for example, the BLM).

184 The SRSCS, reauthorized in March 2018, was enacted in part to address this decline by stabilizing payments to counties dependent on revenues from Federal timber sales. **The SRSCS program has been authorized again after March 2018.**

188 In a 2008 survey of public land uses in Utah (Krannich 2008), 76 percent of respondents from ~~Dagget~~, **Daggett**, Duchesne and Uinta Counties rated development of energy resources as "very important" for the quality of life of people living in their communities.

189 and elsewhere: 2008 Beliefs and Values study (Russell 2008) **The 2008 Krannich study was based on responses from residents in the Daggett, Duchesne and Uintah County area. Where were the respondents from in the Russell study? If those respondents were not from the proximity of the Ashley National Forest, that may explain how the mindset of the Russell respondents differ considerably from that of the Krannich respondents.**

189 Key tribal resources and relevant habitat types are identified in table 3-53, in "Areas of Tribal Importance." **Table 3-53 is entitled "Minority and Low-Income Populations within the Socioeconomic Plan Area (2018)". Areas of Tribal Importance don't seem to be included in this table.**

197 There are numerous commercial fuelwood operations and five sawmills that process timber in the economic analysis area, as detailed in "Timber." **Page 186 states that there are seven local sawmills rather than five.**

199 Table 3-57. Recreation Experiences Matrix **The following recreation usage should be recognized in the DEIS**:

> **Families use Destination Recreation Areas (see Tables 3-60, 3-61 & 3-62), General Recreation Areas, Trails with Mechanized Access, and Trails with Motorized Access.**
> **Large Groups use Trails with Mechanized Access and Trails with Motorized Access.**
> **Hunters use Remote areas with low use.**
> **Anglers use Destination Recreation Areas, Backcountry Recreation Areas**

and Developed Recreation sites.
Mountain Bikers use Destination Recreation Areas and Backcountry Recreation Areas (see Tables 3-60, 3-61 & 3-62)
OHV users use Developed Recreation sites and Backcountry Recreation Areas where there are existing motorized routes (see Tables 3-60, 3-61 & 3-62).
Cultural and Historic Site visitors use Trails with Mechanized Access and Trails with Motorized Access to reach these sites.
Environmental Justice populations also use Trails with Motorized Access.

202 Overall, oil and natural gas prices have dropped significantly since much higher levels seen earlier this decade. **This statement needs to be updated to reflect the recent rebound in energy prices from the historic lows in 2020 due to travel and gathering restrictions associated with the COVID 19 pandemic**.

203 Under all alternatives, grazing on National Forest Service lands will continue to represent only minor contributions to the ability of the traditional use to continue in the area, particularly for cattle grazing. **This statement seems to conflict with a statement on Page 247, which reads: "Although typical operators depend only partially on public lands to sustain their livestock, forage sources on Federal lands still represent a critical part of grazing operations." The state and counties in the planning area feel that the statement on Page 247 is accurate and the statement on Page 203 is not.**

204 The lack of quantitative objectives for vegetation treatments under alternative A, **and the limitations on vegetation treatments under alternative C** however, would limit the ability to achieve forest-wide changes.

207 This would limit any impacts on environmental justice, **elderly and mobility disabled** communities related to their ability to use preferred recreation sites; it also would minimize constraints on time and costs to travel to recreation.

210 Additional recommended wilderness areas could result in site-specific impacts on the access for recreation and the type of recreational uses available, which may disproportionately affect environmental justice, **elderly, and mobility disabled** communities in terms of costs for access.

211 ~~Users~~ **User** groups who prioritize developed recreation sites and motorized use may have decreased satisfaction under this alternative, while those who prioritize solitude, and a backcountry experience may have enhanced experiences.

213 Under alternative C, however, an emphasis on passive vegetation management ~~may~~ **would** be less effective in trending vegetation types toward the natural range of variation and improving carbon storage capabilities and ecosystem resilience to climate change at large scales, compared with alternative B.

213 This would result in an additional potential for site-specific impacts on ability to access recreation areas (in terms of **time and** costs for access).

213 Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with Alternative A **however, to a lesser degree than alternative B, due to the restrictions on active vegetation management**.

213 Under alternative C, reduced mechanical treatments and reliance on natural processes would reduce short-term impacts from treatment **but provide reduced long-term benefits on ecosystems when compared to alternative B**.

213 Exposure pathways—Impacts under alternative C would be similar to those described under alternative B. Due to a reliance on natural processes, short-term impacts from use of prescribed fire would be reduced compared with other action alternatives; however, emissions would occur from use of managed wildland fires. **Under alternative C, the risk of uncharacteristic wildfire and associated health impacts from emissions would be greater than under alternative B due to the restrictions on active vegetation management in alternative C.**

215 Under alternative D, increased mechanical treatments and **less** reliance on natural processes would increase short-term impacts from treatment.

215 This would limit impacts on access for environmental justice, **elderly, and mobility disabled** communities.

230 Table 3-66: **The table should have a footnote indicating that the Ashley National Forest is in the process of decommissioning and disposing of the Indian Canyon and Stockmore Ranger Stations, which are national register listed properties**.

234 Surface-disturbing activities are associated with economic uses of the Ashley National Forest **and may lead to the discovery of previously unknown cultural resources**. **However**, ~~Cultural~~ **cultural** resources can be directly affected **during surface disturbance** by the modification, displacement, and loss of artifacts, features, and middens, resulting in the loss of valuable cultural resource information on the site function, date of use, subsistence, past environments, and other research questions.

235 This ~~would~~ **may** lead to the potential overuse in some areas.

236 Vegetation management treatments (such as timber harvest, planned ignitions, thinning, and planting) on 1,500 acres would be targeted annually (1,200 acres annually in the second decade) for resource objectives. This acreage of treatments is inconsistent with

the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).

237 Vegetation management treatments (such as timber harvest, planned ignitions, thinning, and planting) on 1,000 acres annually in the first decade and 800 acres annually in the second decade would be targeted for resource objectives. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years)**.

238 While the Forest Service would employ other vegetation treatments, there would be an emphasis on timber harvest and production with 1,600 acres annually in the first decade and 1,300 acres annually in subsequent years. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).**

240 Under the 2012 Planning Rule, identification of lands that are suited and not suited for timber production is required on national forests, based on legal withdraw**al**, site-specific conditions, and the compatibility of lands with the desired conditions and objectives found within the plan components.

241 The lack of natural fire **and the implementation of passive forest management policies** over a century has led to timber stands that are increasingly dense with older trees, and thus more susceptible to insects and disease. Historical fire suppression **and passive forest management** has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife.

242 The combination of fire suppression, **passive forest management** and insect infestation has also resulted in stand conditions that are potentially more susceptible to high-intensity wildfires.

245 When compared with alternative A, alternative ~~B~~ **C** would use modern fire-planning tools to determine high-risk areas, which may offer some protection to timber stands suitable for production and harvest.

249 Factors affecting livestock operations and range management on the Ashley National Forest are largely based on market demand for livestock and rangeland conditions, both of which are based primarily on forage availability. **The market demand for livestock is based on consumer preference rather than forage availability**.

251 Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage **in the short-term, until precipitation or winds remove the dust**.

253 Fire and fuels management would continue to follow direction outlined in the ~~proposed~~ **existing** plan, though it would not use modern prediction and planning tools to determine high-risk areas.

254 Treatments on 1,500 acres of the Ashley National Forest annually (1,200 acres in the second decade) would affect grazing operations through changes in grazing systems; however, these types of management are generally planned around grazing rotations to minimize impacts on grazing operations. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).**

255 These is a small ~~potnteial~~ **potential** for the need for closures of additional acres in pastures where cattle could not be effectively restricted, resulting in additional loss of HMs. These ~~impactes~~ **impacts** would be determined at the site-~~specife~~ **specific** level during ~~implantation~~ **implementation.**

255 Treatments on 1,000 acres of the Ashley National Forest on an average annual basis (800 acres on an average annual basis in the second decade), … **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years).**

256 Treatments on 1,600 acres of the Ashley National Forest annually (1,300 acres in the second decade) would affect grazing operations through changes in grazing systems; … **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).**

263-264 An act of Congress is not a reasonably foreseeable action, so environmental consequences on leasable and locatable minerals are expected to be the same as under alternative A. **Even though it cannot be predicted whether Congress will officially designate additional wilderness areas under alternatives B and C, even if these areas are left for a long period of time as recommended wilderness or wilderness study areas, management will preclude any land use that would impact wilderness characteristics. Thus, the environmental consequences for leasable and locatable minerals will be different than under alternative A.**

268 Many roadways outside the Ashley National Forest boundaries pass through tribal or BLM lands and provide the only means of access to the national forest; roads accessing the Duchesne Ranger District, for instance, are on tribal lands**. It may be good to note here or elsewhere in the plan that roads crossing tribal lands to access the forest (such as the Rock Creek Road, the Moon Lake Road and the Uinta Canyon Highway) are in very poor condition and that the USFS supports efforts to obtain Federal Land Access Program (FLAP) grants or other funding to improve these access routes.**

269 Alternatives are currently being explored for the Old Stockmore Ranger Station, which is located on land not connected to the national forest. **This sentence should be updated as the Ashley National Forest Supervisor recently announced that this facility will be conveyed to the GAO which will then convey it to the Ute Indian Tribe (see https://ubmedia.biz/news/41037/ranger-station-land-going-back-to-ute-indian-tribe/.**

271 National direction for Forest Service management actions would continue to affect how infrastructure and facilities are managed across the national forest. Under all alternatives under consideration in this EIS, variable infrastructure and facilities budgets would affect maintenance and further infrastructure development. National direction will also continue to provide forests with guidance in the management of facilities and infrastructure on Forest Service lands. **The first and third sentences above appear to be repetitive**.

273 They would accrue from the provision of more dispersed camping docks, mountain bike-designated use, improvements to dispersed camping sites and access roads, OHV loop ~~tails~~ **trails**, and other recreational facilities.

274 Roughly 11 miles of the route will be in the **South Unit of the Duchesne** - Roosevelt Ranger District.

274 The Round Park Hardened Stream Crossing Project **would provide** hardened ford structures at two stream crossings in the Round Park area.

274 The Ashley National Forest offers a variety of developed and dispersed recreational activities, such as camping and picnicking, hiking, mountain biking, horseback riding, wildlife and scenic viewing, hunting and fishing, ~~enjoying snow sports~~ **OHV riding**, and rock climbing. Wintertime activities are snowshoeing, cross-country skiing, ice fishing, and snowmobiling. **There is no need to mention "enjoying snow sports" in the first sentence when the second sentence lists a variety of wintertime (snow) activities**.

285 Compared with alternative A, alternative B acres vary only slightly, with a slight increase in motorized ROS classes (ROS roaded and ROS semi-~~primtive~~ **primitive** ~~motirozed~~ **motorized**) and a shift of some acres from ~~semiprimtive~~ **semiprimitive** ~~nonmotirzed~~ **nonmotorized** to primitive ROS class. Compared with alternative A, this may provide enhanced opportunities for motorized users as well as those looking for less developed, primitive non-motorized recreation experiences. ~~Altnerative~~ **Alternative** B would also include objectives to increase and improve both motorized and ~~nonmtorized~~ **nonmotorized** routes, improving recreation ~~opprotuntes~~ **opportunities** for these users.

286 Vegetation management under Alternative B would include annual treatment targets that would result in ~~changes to sort~~ **short** and long-term changes to vegetation structure and related recreational settings.

287 It aims to treat 1,000 acres **annually** in the first decade and 800 acres **annually** in the second decade of vegetation management.

288 Alternative D aims to treat 1,600 acres **annually** in the first decade and 1,300 acres annually in the second decade of vegetation management.

291 The two scenic byways on the Ashley National Forest decision area are the Dinosaur Diamond Scenic Byway (11.8 miles in the decision area) and Flaming Gorge-Uintas Scenic Byway (53.6 miles in the decision area) (Forest Service GIS 2020). Also, the Red Cloud Loop Scenic Backway is 36.2 miles in the decision area, and the Sheep Creek Scenic Backway is 11.4 miles in the decision area. **The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at:** https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.

292 Managing for natural-appearing scenery is important to the public. **This blanket statement may not be accurate. There are certain areas of the forest where natural-appearing scenery is important, but other areas, such as in the current Partial Retention or Modification VQO areas, where modifications of scenery would likely be acceptable to the public**.

298 The Forest Service would annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternatives A **and C**.

299 Within the Ashley National Forest's boundaries, landownership (containing surface and subsurface) includes public lands managed by the Forest Service, private inholdings, and Utah State lands **and subsurface mineral resources owned by ??????.**

299-300 Land status is determined by legal regulations, restrictions, and permissions on how the land is used or managed for use, including planning, zoning, easements, and other legal designations. **County zoning ordinances and zoning maps do not apply to USFS lands, but they do to inholdings**.

300 Under the land adjustment programs, the Forest Service acquires and consolidates key tracts of non-Federal land to conserve valuable natural habitat, reduce the risk of permanent development in sensitive areas, and enhance public recreation opportunities. **The plan should also state that, under the land adjustment programs, the Forest Service may dispose of lands no longer needed to meet Forest Service objectives.**

304 Land Withdrawals and Conveyances. This section may be a good place to recognize that certain lands in the Ashley National Forest have been withdrawn from Forest Service management due to the presence of Central Utah Water Project (Bureau of Reclamation) facilities.

304 Central Utah Water Project, Bureau of Reclamation. **It would be helpful to know here the acreage of land withdrawn for this purpose and how this impacts forest management. A map should be provided to show the locations of these CUP-BOR withdrawal areas.**

307 Under alternative C, one new 1,400-acre RNA and 50,200 acres of new wilderness areas would be designated. Additionally, under this alternative, new ROWs would be considered unsuitable within the RNAs, and the recommended wilderness areas would include 48,600 acres of IRAs. This would decrease the amount of access and land available for special-use authorizations, by 113,000 acres, when compared with alternative A. **How was the total of 113,000 acres calculated?**

313 Of the four eligible segments evaluated in the suitability study, none were determined to be suitable for inclusion in the National Wild and Scenic River System in the preliminary suitability determination. **Then why are they being proposed for designation under alternative C?**

314 …scenic backways on the Ashley National Forest are the Red Cloud Loop Scenic Backway and Sheep Creek Scenic Backway**. The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at:** https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.

314 Red Cloud Loop Scenic Backway—This backway can be accessed from Highway ~~131~~ **191** in the Vernal area or at its junction with the Flaming Gorge-Uintas National Scenic Byway, located 15 miles north of Vernal.

316 Under all alternatives, there would be no changes to the FGNRA, scenic byway miles, national recreation trails, geologic areas, or wilderness areas. These areas would continue to be managed according to the enabling legislation for which they were designated. **How can this be true when alternatives B and C would establish additional potential wilderness areas that would be managed to protect those wilderness characteristics?**

317 No acres **within the four recommended wilderness areas** would be found suitable for timber harvest to maintain the option for future designation.

Utah Department of Agriculture and Food
Technical Comments

Cmt #	Page #	Paragraph, line, row, or table #	Comment
1	24	Table 2-2	Table 2-2 differs in language from the language in Appendix B: Comparison of Action Alternative Plan Components. There is concern about consistency and what language will be placed in the Final Environmental Impact Statement (FEIS) and preferred alternative. <u>Example</u>: Table 2-2 Alternative A states, "Utilization and stubble height based on land health standards". Appendix B Alternative A on page B-11 states, "Limit forage utilization by livestock of key browse species on big game winter range to 20 percent." <u>Example</u>: Table 2-2 Alternative B states, "Guideline (FW-GL-LGR) To ensure sustainability and resiliency of forage resources, limit utilization of key forage species to no greater than 50 percent of current year's growth, unless long-term monitoring demonstrates a different allowable use level is appropriate." Appendix B Alternative B on page B-11 states, "50 percent utilization for livestock and 4-inch stubble height guidelines with exceptions where a different height will meet desired conditions."
2	25	Table 2-2	As noted previously, Table 2-2 differs in language from the language in Appendix B: Comparison of Action Alternative Plan Components. There is concern about consistency and what language will be placed in the Final Environmental Impact Statement (FEIS) and preferred alternative. <u>Example</u>: Table 2-2 Alternative A states, "Sheep allotments that remain unutilized for a period of 5 years may be considered for conversion to another class of livestock or closed."

			Appendix B Alternative A on page B-13 states, "No comparable guidelines under Alternative A." <u>Example</u>: Table 2-2 Alternative B states, "New domestic sheep or goat allotments would not be authorized unless…" Appendix B Alternative B on page B-13 states, "Guideline (FW-GL-WL) New permitted domestic sheep or goat allotments should not be authorized unless…"
3	26	Table 2-2	Table 2-2 should compare numbers of Head Months (HM)/Animal Unit Months (AUM) that will be permitted in Destination Recreation Areas (DRA). This should also include the number of HMs/AUMs that would be reduced under Alternative C.
4	52	Effects from Livestock Grazing Management	The Forest Plan lacks clear parameters for what desired conditions are and how to achieve them. As stated in the soils section, soils are one of the resources used to determine when considering if deviations from 50% utilization may occur for livestock grazing. Given the lack of clarity for soils desired conditions, no deviations from 50% utilization will occur. We support flexibility with utilization and stubble height guidelines, but these indicators should be determined at the site-specific level.
5	54	Effects from Livestock Grazing Management	Replace the current language with the following language, "*If desired conditions are not met under alternative D, then site-specific adjustments will be made accordingly.*" Desired conditions need clear definitions and parameters. Alternative D would not be the same as Alternative A, because if desired conditions were not met under Alternative D, then the allotments would require adjustments accordingly.
6	73	Effects from Livestock Grazing Management	This section states that there are approximately 1,000,700 acres of active grazing allotments currently. However, page 24 states there are 919,700 permitted grazing acres. The number of acres varies several times throughout the Forest Plan. It is important to ensure that acreages are accurate under each alternative and analyzed consistently throughout the Forest Plan. See also table 3-70 on pages 248-249.
7	80	Effects from Livestock Grazing	Replace the first sentence with the following language, *"Alternative C would reduce acres available for active*

		Management	*grazing allotments by **13,000** acres…"* Previous sections state 13,000 acres would be removed from livestock grazing under Alternative C, not 130 acres. See pages 79, 251, 255, 297.
8	108	Effects from Vegetation Management	Page 24 of the Plan states that vegetation treatments will occur annually, this section now says every decade. We support increased and timely vegetation treatments and recommend reviewing these sections for consistency.
9	118 – 119	Effects from Recreation	The analysis misleads the reader to believe that the reduction of 13,000 acres of livestock grazing is a benefit. However, reduction of livestock grazing could potentially be very negative, with increased fuels for fire, shifting plant communities to a monoculture, as well as neglecting to include the increased trampling from recreation users, loss of vegetation, etc. The Forest Plan should not allude to livestock grazing being a negative use of the land.
10	119	Effects from Livestock Grazing Management	The Forest Plan inconsistently describes how it will implement DRAs and remove livestock grazing from these areas. Some sections state "exclude" while this section states "closed." We do not support "closure" of allotments, as these areas were already adjudicated and delineated for livestock grazing. USFS Handbook 2209.13 Chapter 10, 16.6 states, *"Grazing permits may be cancelled in whole or in part where a decision has been made to devote certain National Forest System lands to another public purpose that precludes grazing by permitted livestock. Except in an emergency, do not cancel a permit without a two-year notification (36 CFR 222.4(a)(1))."* We are concerned the permittees with grazing allotments in the DRAs have no idea their permits may be cancelled. Communication and collaboration must occur with the USFS and the livestock grazing permittees. Additionally, the DRAs were estimating excluding livestock from 13,000 acres under Alternative C, not 13,400 acres as stated.
11	120	Effects from Livestock Grazing Management	The Forest Plan neglects to accurately convey how each permit and allotment has annual monitoring, Allotment Management Plans (AMP), and Annual Operating Instruction (AOI) meetings and plans. All of which guide livestock grazing to meet desired conditions. Finally, this section neglects to include any impacts or benefits to livestock grazing related to the annual vegetation treatments. We recommend the Forest Plan include these treatments in the analysis across all resources under the Terrestrial Vegetation section.

12	146	Big Game	This section completely excludes nonnative mountain goats. It is essential to include this big game species. Information should be included regarding the population of mountain goats, their geographic location, and distribution. The geographic overlap with bighorn sheep is a major concern given the likely pathogen transmission between the two species.
13	147	Rocky Mountain Bighorn Sheep	This section needs to include more detail regarding the history of bighorn sheep on the Forest. We request for details to be included regarding the history of the original translocation sites, distances from domestic sheep allotments, how far the bighorns have dispersed from the original sites, Utah Division of Wildlife Resources' (UDWR) original intent and level of risk for translocation, etc.
14	160-161	Effects from Livestock Grazing Management	The Forest Plan should include information regarding UDWR's population objectives for big game species. The section as currently written seems to convey that domestic livestock are a causal factor for reducing reproductive rates due to excessive stocking rates. The Plan also lacks the information to determine if bighorn sheep on the Forest actually overlap with active domestic livestock grazing allotments. More specifically, there should be no overlap with domestic sheep and there is little to no high elevation cattle grazing where bighorn sheep are found. Information regarding closed allotments should also be included.
15	160-161	Effects from Livestock Grazing Management	We are appreciative for the use and clarification of the term "overgrazing" as proper grazing does not result in the negative impacts discussed. We recommend that a statement be included that states the following or something similar, *"As AMPs and AOIs are followed and implemented, there should not be issues with livestock overgrazing. Proper livestock grazing has proven to benefit many wildlife species."*
16	160-161	Effects from Livestock Grazing Management	Include a statement that says, *"Many wildlife species benefit from proper livestock grazing and rangeland infrastructure. Range improvement projects are utilized by wildlife as well as livestock, especially projects that increase and improve watering sources."*
17	162	Effects from Livestock Grazing Management	The analysis ignores the fact that each permit has individual NEPA to analyze impacts. Additionally, each permit is accompanied by an AMP, annual monitoring data, with the ability to make grazing management changes prior to the turnout of livestock for each grazing season. It is concerning that the analysis leads the reader to believe the Forest Plan is the only regulatory mechanism to guide grazing.

			Additionally, well managed livestock grazing actually improves wildlife habitat.
18	162	Effects from Livestock Grazing Management: 3rd paragraph	*"Lower stubble height and higher forage utilization would cause plant communities to shift toward nonpalatable or grazing-tolerant species, which would reduce forage for native ungulates such as bighorn sheep."* Why are bighorn sheep singled out in this paragraph? They are not the only wild ungulate species on the Forest. It seems like this paragraph is persuasively written to make livestock grazing seem like a negative multiple use of the land. Additionally, domestic sheep are managed to maintain separation with bighorn sheep so they don't compete for forage. A suitability analysis would help identify if there is any overlap between cattle and bighorn sheep.
19	172	Effects from Livestock Grazing Management: 2nd paragraph	The Forest Plan's analysis related to domestic sheep and bighorn sheep is flawed. The analysis does not provide information related to how bighorn sheep left their original translocation site and are now directly next to active domestic sheep allotments. Under Alternatives B, C, and D, they all rely on current permittees waiving without preference. The analysis simply restates the guidelines from Chapter 2, but completely neglects to tie how the guideline addresses the persistence of bighorn sheep. The Forest Plan does not describe how much actual separation is needed between domestic sheep and bighorn sheep. The way domestic sheep and bighorn sheep are addressed in the Forest Plan will likely decimate the domestic sheep grazing industry on the Ashley National Forest. The State of Utah Bighorn Sheep Management Plan and equivalent plan for the State of Wyoming must be implemented and followed.
20	172	Effects from Livestock Grazing Management: 2nd paragraph	We are appreciative for referencing the use of the state bighorn sheep management plans for the state of Utah and Wyoming. These plans are extremely beneficial when making determinations regarding the management of domestic sheep and bighorn sheep. UDWR has the jurisdiction for managing bighorn sheep in the state of Utah and the USFS should default to UDWR's management direction and respect UDWR's authority with this issue.
21	172	Effects from Livestock Grazing Management: 2nd paragraph	Alternative B is not a reasonable alternative for the following reasons: 1) The amount of separation needed to address foraying rams would essentially remove all domestic sheep from the Forest. 2) High elevation grazing is already limited with late snow run off and green up of forage. 3) The potential of converting a permit is not adequate, and the

			reality of cattle grazing at these high elevations makes this unreasonable. 4) The permit would have to first be converted, then only get limited use under a forage reserve. 5) Potentially closing the allotment is not acceptable. The allotments are already adjudicated and delineated for grazing. Closing the allotments takes this off the books, eliminating grazing in perpetuity, regardless of potential vaccines, etc. We are very concerned the USFS has not addressed our previous concerns regarding the Proposed Action and Range of Alternatives.
22	174	Effects from Livestock Grazing Management: 1st paragraph	Closure of areas to livestock grazing would modify and require additional project level NEPA to delineate new allotment boundaries and require a two-year notification for existing permittees according to USFS regulations.
23	174	Effects from Livestock Grazing Management: 3rd paragraph	Alternative C is not a reasonable alternative for the analysis. Closure is not equitable to or synonymous with separation. Closure of these allotments will remove all domestic sheep from the Forest due to bighorn sheep, which is a violation of the Utah Statewide Bighorn Sheep Management Plan and does not meet the original intent by UDWR when bighorn sheep were translocated. Currently bighorn sheep have full access to inhabit anywhere on the Forest, thereby creating and expanding core herd home range. The delineation of core herd home ranges with unmanaged bighorn sheep populations to close domestic sheep allotments when opportunities arise causes us great concern. The range of alternatives is inadequate and does not provide any certainty or assurance for the domestic sheep permittees to successfully graze in the future.
24	General	General: Bighorn Sheep	The range of alternatives for bighorn sheep near domestic sheep is grossly inadequate. While waiving without preference may be conveyed as voluntary, one permittee's decision to waive without preference should not determine the fate of the domestic sheep industry as a whole. The range of alternatives should include one or more alternatives in favor of domestic sheep maintaining existing permits without additional pressures of bighorn sheep. The boundaries of domestic sheep allotments have not changed since the original translocation, but the permittees are required to manage their animals to ensure separation of bighorn sheep. Additionally, the analysis in Chapter 3 does not actually analyze the guidelines under each Alternative. Rather, they simply repeat the language from the alternatives. The analysis should actually be tied back to the persistence analysis. There's no width to the proposed

			analysis and all are contingent on existing permittees waiving without preference. The alternatives should assume permittees are going to graze in perpetuity and incorporate voluntary best management practices where appropriate.
25	176	Effects from Livestock Grazing Management: 1st paragraph	*"Unlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduced habitat features such as forage and cover."* Alternative D in Appendix B on page B-11 states, *"Utilization of key forage species meets desired conditions for soils and terrestrial vegetation."* not "*land health standards*." Desired conditions for terrestrial vegetation under Alternative D take into consideration wildlife habitat forage and cover. Annual changes would be made during the development of the AOI prior to turnout of livestock to ensure desired conditions are met. The analysis misleads the reader to believe only Alternatives B or C are acceptable.
26	196	Livestock Grazing: 3rd paragraph	This section is an economic impact analysis and should include information showing that reduction in HMs/AUMs would result in decreased economic impact.
27	247	Introduction	We are appreciative for the improvements made to the Livestock Grazing section in this current draft compared to previous drafts. Including the history of livestock grazing on the Forest is important for the public to understand. It would also be beneficial to include statements describing the cultural importance of livestock grazing and how it contributes to the heritage, lifestyle, and history of these lands.
28	247	Introduction	There should be a paragraph or at least a few sentences that states the ecological benefits of livestock grazing. Several key points include that, livestock grazing contributes to the long-term health and sustainability of the rangeland. Properly grazed landscapes help provide habitat and forage for many wildlife species. Additionally, livestock grazing helps reduce the risk of catastrophic wildfires.
29	247	4th paragraph	Edit the following sentence to read, *"Grazing operators may rotate ~~cattle~~* ***livestock*** *between pastures throughout the year, both on and off Federal lands."* Using the term livestock here is a more accurate statement as this sentence also applies to sheep, goats, horses, and not

			cattle exclusively.
30	249	Description of Affected Environment: 2nd paragraph	*"Market demand for livestock products in the U.S. is expected to slowly decline over the coming decades but will surely remain an important economic contributor for the surrounding communities".* This alludes to people no longer eating meat, yet as the population increases, demand for beef and lamb is likely to increase. Additionally, livestock products are used for much more than only food. We request that this sentence be removed from the Forest Plan.
31	250	Analysis Assumptions: 3rd bullet point	There needs to be an option that allows allotments to reopen when there is demand. This will help include new producers that want to enter the livestock industry and not exclude them because of timing.
32	250	Analysis Assumptions: 3rd bullet point	The Forest Plan neglects to identify the number of allotments currently closed. This should be included in the Forest Plan by developing a range of alternatives to review the closed allotments and consider reopening them to active grazing where appropriate. Closing an allotment based on an individual permittee's decision, as is the case with waiving without preference and taking a buyout, is not representative of the livestock industry's current need for grazing allotments.
33	252	Effects from Vegetation Management, Timber Harvest, and Sustainable Ecosystems: 3rd paragraph	The Forest Plan should not allow expansion of bighorn sheep populations when it negatively impacts domestic sheep allotments. This is a direct violation of the intent behind the translocations as well as the Statewide Bighorn Sheep Management Plans. We request that this language is removed, and this only further indicates the intent to permanently remove domestic sheep grazing from the Forest.
34	253	1st paragraph	This paragraph misleads the reader to believe that forest-wide utilization rates and stubble heights are the only way to achieve healthy rangeland. This is false and a flawed analysis. Determining utilization rates and stubble heights at the site-specific level will help to achieve healthy and sustainable rangelands. Some allotments may require less intensity of grazing to allow the rangeland to recover, and some allotments may allow for more intensity of grazing as the rangeland is able to sustainably manage increased intensity. Under Alternative A, only one out of 123 watersheds are not meeting desired conditions. This indicates current grazing

			management using site-specific forage utilization and stubble heights at the allotment level does work. There is a need for project-level NEPA, AMPs, and AOIs. These management tools are implemented more effectively and will give better results than a broad forest-wide requirement.
35	253	Environmental Consequences for Livestock Grazing—Alternative B: Effects from Livestock Grazing Management	As stated many times in previous comments, we are firmly opposed to implementing specific utilization rates and stubble heights at the forest plan level. These decisions should be made at the site-specific level. This section is written in a way that the 50% utilization rates and 4-inch stubble heights will be implemented as a standard and requirement. However, in past versions of the Forest Plan and in numerous meetings with Ashley National Forest personnel, the staff has assured us that the utilization rates and stubble heights would be implemented as a guideline and not a standard. This newest version of the Forest Plan reveals that our presumption that these utilization rates and stubble heights will be treated as a steadfast standard are true. This section also states that different utilization rates and stubble heights may be used if, *"monitoring indicates a different level sufficient to meet and maintain desired conditions".* However, there isn't even the opportunity for a greater utilization rate or shorter stubble height to be implemented because of the steadfast 50% utilization rate and 4-inch stubble height requirement. No one will be willing to go beyond these indicators for fear of litigation. The 4-inch stubble height requirement previously only applied to riparian areas, now this stubble height is required throughout everywhere in each allotment? Overall, utilization rates and stubble heights need to be more flexible in order to meet the needs of the rangeland and achieve maximum sustainable use. Included at the end of this comment letter is a list of scientific studies and data that shows why utilization rates and stubble heights should be decided at the individual allotment level rather than the forest plan level. These indicators should be used as management tools, not management objectives.

36	254	Effects from Designated Areas	Impacts on livestock grazing when recommending more wilderness areas is not nominal. A major impact on grazing from more wilderness areas is access to allotments and maintenance of rangeland infrastructure. A wilderness area designation makes it extremely difficult to access and implement range improvement projects. These projects are very beneficial to the rangeland and help achieve healthy landscapes.
37	254	Effects from Vegetation Management, Timber Harvest, and Sustainable Ecosystems: 2nd paragraph	When a domestic sheep or goat grazing permit for an allotment is voluntarily waived without preference, conversion of these allotments to a cattle allotment is unrealistic due to the elevation and terrain of these allotments. There needs to be an additional option that allows the allotments to continue being used as a domestic sheep or goat allotment and allows new permittees to enter the sheep industry.
38	Appendix B: Page B-13	Table B-2: Wildlife	Appendix B: Table B-2 includes Guidelines related to new permitted domestic sheep and goat allotments, as well as exclusion of pack goats. While we support the use of pack goats for those who choose to use them and can manage pack goats, the analysis lacks any information if there are pack goat permits currently issued, how many, and if they are currently permitted in bighorn sheep Core Herd Home Range (CHHR). We also believe the Forest Plan should analyze the permitting of pack goats equitably with domestic sheep.
39	Appendix D: Page D-23	1st paragraph	*"Also included is a component specific to greater sage grouse that would stipulate 70 percent or more of sagebrush communities have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy cover in greater sage-grouse seasonal habitat (FW-DCNFS 02)."* The Forest Plan must follow the 2015 Sage-grouse Plan for both Utah and Wyoming, by incorporating the existing plan components into the DEIS. However, the Forest Plan language is not consistent with the following language from 2015 UT Sage-grouse Plan: *"PHMA—Maintain all lands ecologically capable of producing sagebrush (but no less than 70 percent) with a minimum of 15 percent sagebrush cover, or as consistent with specific ecological site conditions…In SFA and PHMA, the desired condition is to maintain all lands ecologically capable of producing sagebrush (but no less than 70 percent) with a minimum of*

			15 percent sagebrush cover or as consistent with specific ecological site conditions; exceptions to this objective shall be made where GRSG habitat and Utah prairie dog occur on the same landscape, which will be managed for both species. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6)."
40	Appendix E: Page 45	Livestock Grazing	The Livestock Grazing section is completely void of any project development, assurances to maintain allotments or HMs/AUMs, etc. Rather than basing all livestock grazing solely around enforcing a 50% utilization rate and 4-inch stubble height, the Forest Plan should include desired conditions, goals, guidelines, etc. that include management objectives to maintain and implement range improvement projects that will contribute to the health and benefit of the land.
41	Appendix E: Page 93	Monitoring	The Forest Plan completely revolves around 50% utilization and 4-inch stubble height requirements for livestock grazing. There are many more management tools that can be used to contribute to the health of the land with maximum sustainable use for livestock grazing. The Forest Plan needs to include monitoring questions that include the number of HMs/AUMs for grazing, acres grazed, and any changes in grazing systems.
42	Appendix G: Pages 156, 157, 159, 161	6. Summary of the factors considered, and the process used in evaluating the area and developing the alternative(s)	Each of these recommended wilderness areas states that, *"There is public interest to recommend all inventoried wilderness areas as wilderness".* However, there is also public interest to not recommend any of the inventoried wilderness areas as wilderness. Therefore, this statement is biased and should not be included as rationale for recommending wilderness areas. If a statement such as above is included, there should also be a statement saying, *"There is public interest to not recommend any of the inventories wilderness areas as wilderness."*

References

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USDA Forest Service. 2005b. Implementation of the principles of obtaining and interpreting utilization data on southwest rangelands. File Code: 2210. From Harv Forsgren to Region 3 Forest Supervisors. Albuquerque, NM, USA: USDA Forest Service. 2 p.

February 15, 2022

Sue Eickhoff
Forest Supervisor
Ashley National Forest
355 North Vernal Ave.
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Supervisor Eickhoff:

Thank you for the opportunity for the State of Wyoming to comment on the Draft Environmental Impact Statement (DEIS) for the Ashley National Forest Plan Revision.

National Forests, including the Ashley National Forest (ANF), are essential to our economy, citizens, and visitors. The forest plan revision process is key to the management of national forests and integral to the future of states and forest adjacent communities since the Plan Revision will guide management decisions on the forest for the next 15 to 20 years.

The ANF Plan Revision process has been ongoing for over five years. The State of Wyoming has participated diligently in the process as a cooperating agency, submitting hundreds of comments and attending many meetings. At times, we have been frustrated by a lack of responsiveness from the ANF to our comments and concerns. Still, we appreciate the renewed effort to engage cooperators, fully understand our issues, and provide more than dismissive justifications for our concerns.

Attached you will find comments from the State of Wyoming. In an effort to be as helpful and clear as possible, many comments include suggested language changes. There are also a number of general comments that apply to either an entire resource section of the DEIS or the DEIS as a whole. The ANF is encouraged to review the comments provided by Wyoming state agencies closely, and please contact us if you have any questions or need further clarification. On behalf of our state cooperating agencies, we request the ANF provide us the opportunity to discuss the potential agency preferred alternative.

Sincerely,

Mark Gordon
Governor

MG:kb:kh

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State of Wyoming Cooperating Agency Comments on Ashley National Forest DEIS							
Commenter	**Document**	**Chapter**	**Page #**	**Component #**	**December 2021 DEIS Language**	**Cooperator Recommended Language Changes/Additions**	**Cooperator Explanation of Recommended Language or Comment**
Governor's Office	DEIS			General Comment			The comments from the Governor's Office are intended to highlight some of the largest perceived issues with the DEIS and are not all inclusive. Some of Wyoming's comments are broad and only involve a certain example, but should be reviewed against the entirety of the document. The Ashley NF is encouraged to closely review the comments provided by Wyoming state agencies for further detail on specific topic areas.
Governor's Office	DEIS			General Comment			The DEIS is clunky and often confusing. In many instances the chains of logic are incomplete, phrases are interchanged, or analyses are simply divergent. State agencies have identified many of these areas but all share concerns surrounding the validity of the analysis across the DEIS. In some instances, the FS is dangerously close to appearing pre-decisional on a prefered alternative. This is a result of analysis that guides the reader to the superiority of alternative B over the other alternatives, rather than providing analysis against an unbiased baseline for each resource area in each alternative.
Governor's Office	DEIS			General Comment			The DEIS lacks clarity on how the Flaming Gorge National Recreation Area planning process will be influenced by the Ashley Forest Plan Revision and how that process will proceed.

Governor's Office	DEIS	3	323	Plan Consistency Review			The DEIS only lays out the legal requirement for the FS to perform a consistency review between the alternatives and state/county land use plans and policies. It does not provide an analysis of the consistency between the alternatives and the relevant plans and policies. The stakeholders and public should be made aware of any analysis completed and analysis completed in the past should be reviewed in light of any changes that may have occurred or conditions that may have changed.
Governor’s Office	DEIS			General Comment			The State of Wyoming is supportive of maintaining multiple use on FS land, which is inhibited by additional designations of wilderness areas and other restricted areas, such as backcountry recreation areas.
Governor’s Office	DEIS			General Comment			The State of Wyoming is concerned about the use of natural ignitions as a management practice to meet objectives.
WDA	DEIS	2	23	Table 2-2	Annual Vegetation Treatment: Alternative C "No comparable plan components.	Should read "Same as Alternative A"	

WDA	DEIS	2	24	Table 2-2	Example: Alternative A: Ch. 2: "Utilization and stubble height based on land health standards." Alternative B: Ch. 2: "50% utilization and 4 inch stubble height guidelines with exceptions where different height will meet desired conditions VERSUS Alternative A: Appendix B: "Limit forage utilization by livestock of key browse species on big game winter range to 20 percent." or Alternative B: Appendix B: "To ensure sustainable and resiliency of forage resources, limit utilization of key forage species to no greater than 50 percent of current year's growth, unless long-term monitoring demonstrates a different allowable use level is appropriate."		Appendix B Language Comparison of Action Alternative Plan Components differs greatly from Ch. 2 Comparisons Table. Concern of what language will go into FEIS and Preferred Alternative. WDA does not support a site specific utilization level or stubble height in the Land Use Plan. As stated in previous comments, we believe this is a project level decision. Each allotment has different ecological sites, including different soils, vegetation, and precipitation. Therefore, utilization levels should be determined individually under project level NEPA.
WDA	DEIS	2	25	Table 2-2	Example: Alternative A: Ch 2: "Sheep Allotments remain unutilized for a period of 5 years may be considered for conversion to another class of livestock or closed" VERSUS Appendix B: No comparable guidelines under Alternative A." Alternative B: Ch 2: "New domestic sheep or goat allotments would not be authorized unless separation... VERSUS Appendix B: Alternative B: "New permitted domestic sheep or goat allotments should not be authorized..."		Appendix B Language Comparison of Action Alternative Plan Components differs greatly from Ch. 2 Comparisons Table. Concern of what language will go into FEIS and Preferred Alternative.WDA does not support the range of alternatives related to domestic sheep and bighorn sheep.
WDA	DEIS	2	26	Table 2-2	Destination Recreation Areas for Grazing compare permitted acres.		Table should compare the number of HMs/AUMs permitted in DRAs including the number reduced under Alternative C.
WDA	DEIS	3	49		"Over the life of the plan, livestock grazing management that results in improvements to land health conditions would maintain the soil condition:"	"Over the life of the plan, livestock grazing management that results in improvements to meeting desired conditions..."	Plan language needs to have consistency throughout to tie back to guidelines and determine if desired results are met.

WDA	DEIS	3	50		"This desired condition is being met in rangeland areas, except where soil conditions are deteriorating."		There isn't a direct correlation with existing livestock grazing management, utilization levels, stubble heights, and deteriorating soils. However, this section of the analysis assumes livestock grazing may be the causal factor for deteriorating soils. Shallow soils, wind swept ridges, headcuts, recreation, etc. are all other ecological factors to consider for deteriorating soils. The analysis must consistently analyze the resources and causal factors equitably with use of monitoring data.
WDA	DEIS	3	52		"Alternative B would provide specific utilization and stubble height guidelines that could be increased or decreased depending on the soil conditions..."		The Plan lacks clear parameters for what desired conditions are and how to achieve them. As stated in the soils section, soils are one of the resource determinants if deviations from 50% utilization may occur. Given the lack of clarity for soils desired conditions, no deviations from 50% utilization will occur. WDA cannot support this language as proposed.
WDA	DEIS	3	53		"This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height exceeds 4 inches."	"This would implement a 40 percent utilization level and 4 inch stubble height level."	While WDA does not support the alternative, the language in the plan is inconsistent and inadequately analyzes the actual impacts between the alternatives.
WDA	DEIS	3	54	Effects from Grazing	"Similar to alternative A, alternative D would not include specific utilization or stubble height guidelines. Impacts on soils under alternative D would be the same as those described under alternative A."	"If desired conditions are not met under alternative D, then site specific adjustments will be made accordingly."	Desired conditions need clear definitions and parameters for meeting. Alternative D would not be the same, because if desired conditions were not met under D, then the allotments would require adjustments accordingly.
WDA	DEIS	3	65	Table 3-8	Total Average Size (Acres)		The math doesn't average when totalled and divided. Need to redo the math and provide an explanation how average acres are determined.

WDA	DEIS	3	73	Effects from Livestock Grazing	"Approximately 1,000,700 acres of active allotments.."		Alternative C, page 24 states 919,700. Ensure acreages are accurate under each alternative and analyzed consistently throughout the Plan. See also page 248.
WDA	DEIS	3	79	Effects from Livestock Grazing	"Livestock grazing would be restricted in destination recreation areas under alternative C. This would removes 13,000 acres from grazing and would eliminate potential impacts on water quality for streams..."		Are all DRAs in or near streams? This section is out of place. No other alternative compares the environmental impact by livestock grazing.
WDA	DEIS	3	80	Effects from Livestock Grazing	"Alternative C would reduce acres available for active grazing allotments by 130 acres..."	Alternative C would reduce acres available for active grazing allotments by 13,000 acres."	
WDA	DEIS	3	81	Effects from Livestock Grazing	"This would remove 2,100 acres of riparian vegetation and 600 acres of wetlands..."		This is the first time a breakdown of the type of acres in the DRAs. The analysis is incomplete by only analyzing the impacts from grazing and lacks the increased impacts from trampling by increased recreation use. Examples will include trampling of vegetation, eroding of streambanks, creation of trails, by humans and vehicles. WDA urges the Plan to acknowledge and analyze the impacts to DRAs by other uses.
WDA	DEIS	3	108	Effects from Veg	"Under alternatives B, C, and D, vegetation treatments would occur over every decade following plan implementation..." "The total for mechanical timber oriented treatments is approximately (rounded to the nearest 100 acres) 1,500 acres for the first decade and 1,200 acres for the second decade."		Page 24 states vegetation treatments will occur on an annual basis, not decade. We recommend reviewing the Plan in its entirety to ensure an analysis consistency.

WDA	DEIS	3	118	Effects from Veg	"Alternative C aims to treat 1,000 acres in the first decade and 800 acres in the second decade."		Page 24 states vegetation treatments will occur on an annual basis, not decade. We recommend reviewing the Plan in its entirety to ensure an analysis consistency.
WDA	DEIS	3	118 - 119	Effects from Rec	"Livestock grazing would be excluded from destination recreation areas (23,000 acres). However only 13,000 acres currently have active grazing, therefore reduction of potential effects to terrestrial vegetation would be limited to this area."		The analysis misleads the reader to believe the reduction of livestock grazing from 13,000 acres is actually a benefit. However, it could potentially be a negative, with increased fine fuels for wildfire, shifting plant communities to a monoculture, as well as neglecting to include the increased trampling from recreation users, such as tents, fisherman walking the stream banks, loss of vegetation for increased facilities, etc.
WDA	DEIS	3	119	Effects from grazing	"Alternative C would have reduced acres (13,400 acres closed) available for active grazing allotments and fewer HMs, compared with Alternative A."		The Plan inconsistently describes how it will implement DRAs and remove livestock grazing from these areas. Some resource section analysis states "exclude" while this section states "closed." We do not support "closure" of allotments, as these areas were already adjudicated and delineated for grazing livestock. USFS Handbook 2209.13 Chapter 10, 16.6 states "Grazing permits may be canceled in whole or in part where a decision has been made to devote certain National Forest System lands to another public purpose that precludes grazing by permitted livestock. Except in an emergency, do not cancel a permit without a two-year notification (36 CFR 222.4(a)(1))." WDA is concerned the permittees with grazing allotments in the DRAs have no idea their permits may be canceled. Additionally, the DRAs were estimating excluding livestock from 13,000 acres, not 13,400 acres as stated.

WDA	DEIS	3	119	Effects from grazing	General Comment		The analysis lacks any indication of impacts or benefits to livestock grazing permits from vegetation treatments and the differences between the sizes of treatments across the range of alternatives.
WDA		3	120	Effects from grazing	"This provides flexibility for grazing management and may result in utilization levels higher or lower than 50 percent and reduced or increased stubble heights ..." "Without a defined stubble height guideline for key forage species, grazing below 4-inch stubble height may prevent key forage species from reestablishing..."		Given this analysis is comparing Alternative D to A, and Alternative A does not have 50 percent utilization or 4-inch stubble height limits, this analysis is flawed. Additionally, the analysis is biased. The Plan neglects to accurately convey how each permit and allotment has annual monitoring, Allotment Management Plans, Annual Operating Instruction meetings and plans; all of which guide livestock grazing to meet desired conditions. Finally, this section neglects to include any impacts or benefits to livestock grazing related to the annual vegetation treatments. WDA recommends the Plan include these treatments in the analysis across all resources under the Terrestrial Vegetation section.
WDA	DEIS	3	146	Big Game	General Comment		The big game section completely excludes non-native mountain goats. This is imperative to divulge, not only the population of mountain goats, but also their geographic location and distribution. The geographic overlap with bighorn sheep is a major concern given the likely pathogen transmission between the two species.

WDA	DEIS	3			General Comment		WDA urges the USFS to include language regarding the Statewide MOU for management of bighorn sheep. This document was signed by the USFS and includes direction in which the agencies should work to manage the species, while not at the expense of removing domestic sheep from public lands.
WDA	DEIS	3	147	Bighorn Sheep	"Bighorn Sheep were reintroduced on the Ashley National Forest in 1983."		WDA understands the first reintroduction was in 1989 not 1983, and all bighorn sheep on the Ashley are a result of translocation. We are greatly concerned this section inadequately provides the history of the original translocation sites, acknowledging the translocation occurred with active domestic sheep grazing, distances of original translocations of bighorns from existing and active domestic sheep allotments, distance bighorns have dispersed from the original translocation sites, UDWR's original intent and level of risk for translocation, etc. The Plan must also tie back to a viability/persistence analysis, followed by how the range of alternatives addresses viability of bighorn sheep.

WDA	DEIS	3	161	Effects from grazing	"Deer may avoid sites with high cattle utilization (Collins and Urness 1983), and reproductive success may be lower in areas with high cattle stocking rates (Smith 1984). In addition to habitat alterations, domestic livestock grazing can have adverse effects on bighorn sheep populations by increasing competition for space and forage."	remove statement	The Plan's analysis lacks the UDWR's population objectives for big game species. Statements such as those provided are conveying domestic livestock as a causal factor for reducing reproductive rates due to excessive stocking rates. The Plan also lacks the information to determine if bighorn sheep on the Ashley actually overlap with active domestic livestock grazing allotments. More specifically, there should be no overlap with domestic sheep and there is little to no high elevation cattle grazing where bighorn sheep are found. If there are closed allotments this also needs included. We believe this is imperative to divulge in the Plan and analyze accordingly. Finally, these studies are old and unlikely an actual issue. WDA recommends removing this statement.
WDA	DEIS	3	162	Effects from grazing	"The absence of forest-wide forage utilization guidelines could result in relatively higher levels of impacts (for example, from reduced vegetation cover)..."		The analysis is biased and ignores the fact that each permit has individual NEPA to analyze impacts. Additionally, each permit is accompanied by an AMP, annual monitoring data, with the ability to make grazing management changes prior to the turnout of livestock the following grazing season. WDA is concerned how the analysis leads the reader to believe the Plan is the only regulatory mechanism to guide grazing, and ignores the benefits of well managed livestock grazing to actually improve wildlife habitat. WDA recommends reviewing the Plan for these biased statements and revising accordingly. Again, we oppose a forest wide utilization guideline.

WDA	DEIS	3	162	Effects from Grazing	"Lower stubble height and higher forage utilization would cause plant communities to shift toward non-palatable or grazing-tolerant species which would reduce forage for native ungulates such as bighorn sheep."		A suitability analysis would identify where cattle grazing is acceptable and where these allotments, if at all, overlap with bighorn sheep. Domestic sheep are managed to keep seperate from bighorn sheep, therefore they can not contribute to reducing forage for bighorn sheep. The plan fails to include monitoring data related to habitat and forage as it relates to wildlife. More specifically, bighorns on the Ashley are translocated and should not be considered "core native."
WDA	DEIS	3	162	Effects from Des. Areas	"Under Alternative A, existing designated areas would remain, but not new management..."		The Plan must identify the number of acres remaining under Alternative A.
WDA	DEIS	3	167 - 168	Effects from Rec and Table 3-40	"Specifically, destination recreation MAs, which emphasize developed recreation experiences in high-use areas with motorized access and support facilities, would have the greatest level of impacts on wildlife and at-risk species." Destination Recreation Areas overlapping Rocky Mountain Bighorn Sheep CHHR		The Table states under each alternative how much overlap with DRAs across bighorn sheep CHHR acres. This should cause great concern given the Plan must reduce impact to ensure persistence of bighorn sheep. WDA insists the Ashley identify and analyze the negative impacts due to stress for bighorn sheep from recreation.
WDA	DEIS	3	172	Effects from grazing	"Compared with Alternative A, this would improve habitat conditions for wildlife and at-risk species within active allotments."		If each allotment has an AMP with benchmark indicators, as stated on page 162, then the statement comparing Alternative B to A is flawed. The Plan has to transparently identify where and why the benchmark indicators at the project/permit level have not worked or provided the appropriate habitat for wildlife. The Plan neglects to include any specific information where wildlife habitat needs improved or how livestock grazing under Alternative A has caused reduced populations, reproduction, or displacement..

WDA	DEIS	3	172	Effects from grazing	"Forest plan components would help to address the threat of pathogen transfer from domestic sheep to bighorn sheep by providing separation when a permit is waived without preference. Where bighorn sheep cannot come in contact with domestic sheep, disease transmission is significantly reduced or eliminated."		The Plan's analysis related to domestic sheep and bighorn sheep is flawed. The analysis does not provide information related to how bighorn sheep left their original translocation site and are now directly adjacent to active domestic sheep allotments. Under Alternatives B, C, and D, they all rely on current permittees waiving without preference. The encouragement of permittees to waive without preference only comes when buyouts by conservation organizations are offered to permittees and often exceed the actual value of the permit. WDA does not support the range of alternatives as proposed and does not support the analysis. The analysis simply restates the guidelines from Chapter 2, but completely neglects to tie how the guideline addresses the persistence of bighorn sheep. The Plan lacks how much actual separation is needed between domestics and bighorns. This amount of separation will likely decimate the domestic sheep grazing industry on the Ashley. Finally, the Ashley must divulge the reality that bighorns in the project area already carry diseases and acknowledge how additional stressors such as winter snow conditions, recreation, and others can negatively impact bighorns and cause die offs.

WDA	DEIS	3	172	Effects from grazing	"...provide separation of domestic and bighorn sheep when a permit is waived without preference by 1) providing separation that would mitigate the threat of pathogen transfer from domestic sheep and goats to bighorn sheep, consistent with the most current state big horn sheep management plans; 2) adjusting the time or dates, or both, when domestic sheep are on the allotment; 3) potentially converting the allotment to a cattle and horse allotment; 4) using the allotment as a cattle and horse forage reserve; 5) potentially closing all or a portion of the allotment to domestic sheep and goats."		Alternative B is not a reasonable alternative for the following reasons: 1) the amount of separation needed to address foraying rams would essentially remove all domestic sheep from the Ashley. 2) high elevation grazing already is limited with late snow run off and greenup of forage, shifting the dates earlier or later is unreasonable. 3) the potential of a conversion is not only unlikely, but the reality of cattle actually grazing at the high elevation makes this unreasonable, 4) you have to convert to cattle first under 3, then only get limited use under a forage reserve. 5) potentially closing the allotment is not acceptable. The allotments are already adjudicated and delineated for grazing. Closing the allotments takes this off the books, eliminating grazing in perpetuity, regardless of potential vaccines, etc. We are very concerned the Ashley has not addressed our previous concerns regarding the Proposed Action and Range of Alternatives. We insist on a complete revision of the alternatives related to domestic sheep and bighorn sheep.

WDA	DEIS				General Comment regarding allotment closures		As a conservation organization or agency by intent, nature, and statute, the Ashley NF EIS is not meeting or implementing these principals. Closure of allotments is discouraged by FS Manuals, yet the Ashley is knowingly and willingly proposing closures throughout the DEIS when the allotments are already deemed suitable and capable. By closing any allotments, the Ashley removes the allotments from future use given changes in livestock management, scientific changes, or other actions. The Forest Plan is narrowly analyzing and making decisions based on current conditions, with no room for management decisions to address the likely changing conditions throughout the life of the Plan.
WDA	DEIS	3	174	Effects from grazing	"Alternative C would have fewer acres with active grazing (13,400 acres closed) and fewer head months (HMs) available relative to all other alternatives. Compared with alternative A, this would reduce the extent of impacts on wildlife and at-risk species from livestock grazing."		The acreage for DRAs is inaccurate. The analysis neglects to compare the difference in impacts to wildlife in the DRAs comparing livestock impacts and increased motorized vehicles and recreation. Closure of the DRAs from grazing is unacceptable. This would modify and require additional project level NEPA to delineate new allotment boundaries and by USFS regulations require existing permittees two years notification.

WDA	DEIS	3	174	Effects from grazing	"Relative to the other action alternatives, this alternative would include additional and more stringent plan direction for separation...Components would include a guideline that would close allotments where permits are voluntarily waived without preference if the allotment does not provide separation between domestic sheep and goats...Additionally, new domestic sheep or goat allotments would not be permitted unless separation from wild bighorn sheep is demonstrated ((FW-GL-WL-10) and domestic sheep and goat allotments that overlap bighorn sheep core herd home range would be closed when opportunities arise (FW-GL-WL 11)."		Alternative C is not a reasonable alternative for the analysis. Closure is not equitable to or synonymous with separation. Closure of these allotments will remove all domestic sheep from the Ashley due to bighorn sheep, which is a violation of the Statewide Bighorn Sheep Management Plan, and does not meet the original intent by UDWR when bighorns were translocated in 1989. Currently bighorn sheep have full access to inhabit anywhere on the forest, thereby creating and expanding core herd home range. The delineation of core herd home ranges with unmanaged bighorn populations to close domestic sheep allotments when opportunities arise causes us great concern. It is not the Ashley's responsibility to expand bighorn sheep across the forest, rather to ensure persistence when possible. The range of alternatives is inadequate and does not provide any certainty or assurance for the domestic sheep permittees to successfully graze in the future. Additionally, there are no management actions, guidelines, or standards to address foraying rams, which are more of a significant risk to existing bighorn herds. WDA encourages the Ashely to identify plan components to address foraying bighorn sheep and include this as part of the persistence analysis.

WDA		3	General		Bighorn Sheep		The range of alternatives for bighorn sheep near domestic sheep is grossly inadequate. While waiving without preference may be conveyed as voluntary, one permittee's decision to waive without preference should not determine the fate of the domestic sheep industry as a whole. The range of alternatives should include one or more alternatives in favor of domestic sheep maintaining existing permits without additional pressures of bighorn sheep. The boundaries of domestic sheep allotments have not changed since the original translocation, but the permittees are required to manage their animals to ensure separation of bighorn sheep. Additionally, the analysis in Chapter 3 does not actually analyze the guidelines under each Alternative. Rather, they simply repeat the verbage from the alternatives. The analysis should actually be tied back to the persistence analysis. There's no width to the proposed analysis and all are contingent on existing permittees waiving without preference. The alternatives should assume permittees are going to graze in perpetuity and incorporate voluntary best management practices where appropriate.

WDA	DEIS	3	General		Bighorn Sheep		Appendix B Table B-2 includes Guidelines related to new permitted sheep and goat allotments, as well as exclusion of pack goats. While WDA supports the use of pack goats for those who choose to use them and believe you can adequately manage pack goats, the analysis lacks any information if there are pack goat permits currently issued, how many, and if they are currently permitted in bighorn sheep CHHR. We also believe the Plan should analyze the permitting of pack goats equitably with domestic sheep. As proposed, we believe this is inconsistent with the Plan analysis.
WDA	DEIS	3	176	Effects from Rec	"Compared with alternative B, impacts on wildlife and at-risk species due to recreation would increase. At risk species that are sensitive to disturbance, such as fringed myotis, may experience increased disturbance...However, plan components to reduce disturbance to caves would reduce the threat of disturbance..."		While the Plan may include a plan component to reduce humans from entering caves, it's unclear if there are caves impacted in the DRAs. Additionally, the analysis lacks how other at risk species are impacted by DRAs or other management areas. There are no equitable plan components for addressing human disturbances, i.e. sage-grouse, bighorn sheep, etc. As proposed, the analysis simply compares acres designated or not. This isn't an actual impact analysis, which we believe must be addressed.

WDA	DEIS	3	176	Effects from grazing	"Unlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduced habitat features such as forage and cover."		Alternative D on B-11 states "Utilization of key forage species meets desired conditions for soils and terrestrial vegetation," not "land health standards."" Desired conditions for terrestrial vegetation under Alternative D takes into consideration of wildlife habitat forage and cover. Annual changes would be made during the development of the AOI prior to turnout of livestock to ensure desired conditions are met. The analysis is biased and misleads the reader to believe only Alternatives B or C are acceptable.
WDA	DEIS	3	176	Effects from grazing	"Relative to the other action alternatives, this alternative would include less stringent plan direction for separation of bighorn sheep from domestic sheep...but it does not specify how it is to be done. This leaves the option open on how to achieve separation or mitigation."		Alternative B does not provide the specifics as stated. The Plan simply states it will provide separation. Alternative C closes the allotments, which is not separation. It's simply an elimination of domestic sheep grazing from the Ashley. Additionally, D-9 states transmission of respiratory pathogens occur between individual bighorns, yet the Plan neglects to include any plan components to address this ongoing issue or inclusion of species overlap with mountain goats and likely reason(s) for not meeting persistence.
WDA	DEIS	3	196	Livestock Grazing	"For changes under alternative C due to exclusion of livestock from destination recreation areas, the Forest Service used a GIS analysis to locate pastures..."		This section is an economic impacts analysis. However, there is no economic tie to the reduction in HMs due to DRAs.

WDA	DEIS	3	210	Env. Consequences	"Whether the entire pastures would be closed would depend on whether the management areas could be managed to restrict cattle (for example, with fencing, natural barriers, or herding).		The statement is genuinely concerning. The Plan is excluding/closing the DRAs by 13,000 acres under Alternative C. However, this now states it could be more, but it's to be determined. This is completely excluded from the range of alternatives Chapter 2 and drastically changes the analysis in both livestock grazing and recreation sections.
WDA	DEIS	3	248	Analysis Area	919,700		1,000,700 found on page 73.
WDA	DEIS	3	249	Table 3-70	General Comment		The Table includes allotments in the Flaming Gorge. Is the Ashley Plan Revision including the allotments and acres in the Flaming Gorge Plan? WDA urges the clarity of this.
WDA	DEIS	3	249	Description	"Market demand for livestock products in the U.S. is expected to slowly decline over the coming decades..."		This alludes to people no longer eating meat, yet as the population increases, demand for beef and lamb is likely to increase. Remove this statement.
WDA	DEIS	3	250	Indicators	"Total aces open and closed to grazing"		The Ashley Plan neglects to identify the number of allotments closed. We are aware of allotments closed from domestic sheep grazing in proximity to bighorn sheep herds. WDA believes this should be included in the Plan by developing a range of alternatives to review the closed allotments and consider reopening them to active grazing where appropriate. Closing an allotment based on an individual permittee's decision, as is the case with waiving without preference and taking a buyout is not representative of the industry's current need for grazing allotments.

WDA	DEIS	3	252	Effects from Veg	"For example, expansion of bighorn populations could result in the need to modify management of domestic sheep allotments to minimize contact between these populations."		The Ashley Plan should not allow expansion of bighorn sheep populations when it negatively impacts domestic sheep allotments. As previously stated, it is not the Ashley's responsibility to expand bighorn sheep populations, rather to identify plan components to ensure persistence if possible. This is in direct violation of the intent behind the translocations as well as the Statewide Bighorn Sheep Management Plan. Remove this language. This only further indicates the intent to permanently remove domestic sheep grazing from the Ashley.
WDA	DEIS	3	253	Effects from grazing	"Without Forest-wide guidelines, different forage use direction could be proposed. This could lead to inconsistent and subjective grazing management across the Ashley National Forest, potentially reducing plant resiliency and forage production."		This is a false and misleading statement. Under Alternative A, only one out of 123 watersheds are not meeting desired conditions. This indicates current grazing management using site specific forage utilization and stubble heights at the allotment level can work. It is inappropriate to misapply and misanalyze the Plan's authority, when there are existing regulations for grazing, including project level NEPA, AMPs, and AOIs.
WDA	DEIS	3	253	Effects from Grazing	"Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches..."		Again, the wording in the Plan is inconsistent throughout and needs consistency. Alternative B is limited to 50 percent utilization <u>of key forage species.</u>

WDA	DEIS				General Comment		The Ashely DEIS is narrowly written with alternatives such as limiting use to 50% of key forage species and 4 inch stubble height. The DEIS should provide a much broader allowance of vegetative use to include exceptions on a site-specific basis by encouraging experimentation or innovation. Given the Plan must address climate change, the range alternatives completely prohibits using targeted grazing to address changing conditions, invasive species, or address changes in plant communities.
WDA	DEIS	3	255	Effects from Sus. Rec	"These [sic] is a small potnteial [sic] for the need for closures of additional acres in pastures where cattle could not be effectively restricted, resulting in additional loss of HMs. These impacts would be determined at the site-specific level during implementation. Specific operators may be impacted under this alternative, though those impacts are likely to be minimal."		This is unacceptably open ended. The Plan analysis limits excluding livestock from DRAs at 13,000 acres. As proposed, it's imperative for permittees potentially impacted to have full transparency of the impacts to their allotments and operations. The Plan neglects to include the economic impacts from the closure of allotments already, let alone the additional loss of acres and HMs as indicated.

WDA	DEIS	3	256	Effects from Veg	"Alternative D would not have management direction to close or convert any existing sheep or goat allotments. Allotments that would be considered for conversion or closure under Alternative A would not be affected under alternative D."		B-12 states Alternative A is "No comparable guidelines under Alternative A." Alternative D states: "When a domestic sheep or goat grazing permit for an allotment is voluntarily waived without preference, and if the allotment does not provide separation from bighorn sheep, then authorized use of the allotment should either provide separation of domestic sheep/goats from bighorn sheep or mitigate the threat of pathogen transfer from domestic sheep/goats to bighorn sheep or mitigate the threat of pathogen transfer from domestic sheep/goat to bighorn sheep [sic]." The comparison of the Alternatives is not only inaccurate, but not an actual analysis to determine how Alternative D is better than alternative A when working towards meeting persistence.
WDA	DEIS	App. D/App E.	D - 23, D - 25, E - 28	Greater Sage-grouse	"Also included is a component specific to greater sage-grouse that would stipulate 70 percent or more sagebrush communities have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy in greater sage-grouse seasonal habitat."		The Ashley Plan must follow the 2015 Sage-grouse Plan for both Utah and Wyoming, by incorporating the existing plan components into the DEIS. The Ashley Plan language is not consistent with the following language from 2015 UT Sage-grouse Plan: "PHMA—Maintain all lands ecologically capable of producing sagebrush (but no less than 70 percent) with a minimum of 15 percent sagebrush cover, or as consistent with specific ecological site conditions."

WDA	DEIS	App. E		General Comment			There is a stark difference in authorship in Chapter 2 Development of Desired Conditions, Objectives, Guidelines, and Goals. Some resources are well written with specific components such as Fisheries/Aquatics. For example: Objective (FW-OB-FIS-01) "Complete at least one project per year with design features to restore habitat or populations of aquatic species." This Objective directs the Ashley to implement projects to benefit the resource. The Guidelines are written broadly at the Forestwide Level. However, other resources such as Livestock Grazing are completely void of any project development, assurances to maintain allotments or AUMs, etc. The Guidelines are written at the project level and are regulatory in nature. WDA believes the Plan should revise the Draft to more uniformly develop plan components.
WDA	DEIS	App. E	21	Aspen	"To help support sprouting and sprout survival sufficient to perpetuate the long-term viability and resilience of aspen clones, livestock utilization of key forage species should be limited to no greater than 50 percent of current year's growth, except where long-term monitoring and research demonstrates that a different allowable use level is appropriate."	remove	This guideline is too prescriptive and should not apply across the forest. Rather allow project level NEPA to determine the appropriate vegetation objectives and management practices to achieve those objectives. Additionally, the exception only can occur with long-term monitoring AND research. The likelihood of implementing long-term monitoring specific to the different utilization levels for each project is unlikely.

WDA	DEIS	App. E	81	Destination Rec Areas, General Comment			WDA is very concerned with the Ashley Plan regarding additional designations for recreation, including: Destination Recreation Areas, General Recreation Area, and Backcountry Recreation Areas, of which is 1,103,200 acres proposed under Alternative B. The 1986 Ashley Plan does not include these designations, which is found in Alternative A. The Plan neglects to include why these designations are needed, what regulations guide the designations, how Backcountry Recreation Areas differ from Wilderness, etc. It's even more concerning when these designations are actually reducing livestock grazing. Unlike the Wilderness Act, which retained livestock grazing as it predated the Wilderness Designation, the Ashley is now utilizing new designations with less authority, but without the same respect and retention for existing livestock grazing allotments and permits. Finally, we believe the range of alternatives and respective analysis lacks the width to show impacts from zero areas designated to the full width with the highest designation levels.
WDA	DEIS	App. E	93	Monitoring	Livestock Grazing Monitoring Plan: "Are allotments meeting forest plan and allotment management plan utilization guidelines?"	Add: How many Head Months actively grazed on an annual basis? Add: How many acres were actively grazed on an annual basis? Add: How many allotments were vacated, closed, or placed in forage reserves?	The Plan completely revolves around 50 percent utilization and 4 inch stubble height for livestock grazing. The Plan needs to include the listed Monitoring Questions for livestock grazing to identify how much grazing is changing over the years. This is important as it relates to future Plan Amendments, project level decisions, and the socio economic sections of those NEPA analysis.

WDA	DEIS	App G	155 - 158	Wilderness	Alternative B: "The 10,335 acres were selected ... " Alternative C: "The 50,157 acres of recommended wilderness in Alternative C..."		Table 2-3, Chapter 2 of the Plan had the following wilderness numbers, which do not match the Appendix G: Alternative B: 10,300 and Alternative C: 50,200.
SEO	DEIS	3	63	Water Rights	"This objective includes securing water rights for waters not reserved, in accordance with state laws, for water needed on acquired lands and securing rights on reserved lands, if the reservation doctrine or other Federal law does not apply to the uses involved (Forest Service Manual 2451.22)"	This objective includes securing water rights for waters not reserved, in accordance with state law and interstate Compact constraints, for water needed on acquired lands and securing rights on reserved lands, if the reservation doctrine or other Federal law does not apply to the uses involved (Forest Service Manual 2451.22)	Any impoundment or diversion of waters of the State will require proper permitting. The proponent is advised to contact the SEO with specific plans for alterations or diversions to or from any stream channel in the State of Wyoming prior to commencing work.
WGFD	DEIS	1		General Comment			Language should be included in the introduction identifying that the Sage-grouse 2015 Amendment is being developed separately from the Ashely National Forest Revised Forest Plan and that once the plan is finalized, it will be included in the Ashley Plan.

WGFD	DEIS	3		General Comment			We recommend the Midget Faded Rattlesnake be added as a species conservation concern. The population on the FGNRA is distinct and experiences restricted gene flow from the rest of the range. However, the restricted gene flow has allowed the subpopulation to maintain genetic purity, unlike other subpopulations that have hybridized with Prairie Rattlesnake. Genetic purity enhances the importance of maintaining the subspecies on the FGNRA. In addition, documented den densities for Midget Faded Rattlesnakes on the FGNRA are among the highest recorded. As such, we recommend the Ashley National Forest formally acknowledge the importance of protecting this segment of the population.
WGFD	DEIS	3	146	Big Game	"Elk numbers have increased significantly over the last 30 years. An upward trend in the elk population is predicted for the next plan period (Forest Service 2017a), but ultimately trends for all big game species will depend on big game management by the Utah Division of Wildlife Resources (UDWR)."	Elk numbers have increased significantly over the last 30 years. An upward trend in the elk population is predicted for the next plan period (Forest Service 2017a), but ultimately trends for all big game species will depend on big game management by the Utah Division of Wildlife Resources (UDWR) and the Wyoming Game and Fish Department (WGFD).	WGFD manages elk in the portion of the Ashley NF that extends into Wyoming.
WGFD	DEIS	3	147-148	Greater Sage-grouse	"Although there are many locations of greater sage-grouse on the Ashley National Forest, greater sage-grouse occurs at relatively low numbers on the Ashley National Forest when compared with other areas of its range (Forest Service 2017a). Sage-grouse habitat on the Ashley National Forest only support about 10 percent of the sage-grouse population in the Uinta Basin."	Sage-grouse habitat on the Ashley National Forest support approximately 10 percent of the sage-grouse population in the Uinta Basin in Utah. Approximatly 13% (184,400 acres) of the Ashley National Forest is designated as either priority or general Greater sage-grouse habitat (Table 3-33).	This section misrepresents the contribution of the Ashley NF and FGNRA specifically to regional sage-grouse habitat. The entire FGNRA is either sage-grouse core area (PHMA) or GHMA, which should not be downplayed.

WGFD	DEIS	3	148	Greater Sage-grouse	"Sage-grouse management areas represent the highest-priority areas for sage-grouse conservation in Utah and Wyoming (State of Utah 2019)."	Sage-grouse management areas represent the highest-priority areas for sage-grouse conservation in Utah (State of Utah 2019). Greater sage-grouse Core Population Areas are the highest-priority areas in Wyoming (Executive Order No. 2019-3, 2019).	Wyoming uses sage-grouse Core Population Areas and should not be included in the State of Utah citation.
WGFD	DEIS	3	150	Amphibians and Reptiles	"The western chorus frog (Pseudacris triseriata) is a small frog commonly found throughout much of central and northeastern Utah. It can be found in a variety of habitats, including marshes, grasslands, agricultural lands, and forests, provided that water can be found nearby (UDWR 2020e). The northern leopard frog (Rana pipiens) is fairly common in Utah, but some reports indicate that its numbers may be declining. This frog occurs in a variety of aquatic habitats, particularly near cattails and other aquatic vegetation; however, it may be found foraging relatively far from water. During cold winter months, it is inactive, and it takes cover underwater or in damp burrows (UDWR 2020f)."	The boreal chorus frog (Pseudacris maculata) is a small frog commonly found throughout much of central and northeastern Utah. It can be found in a variety of habitats, including marshes, grasslands, agricultural lands, and forests, provided that water can be found nearby (UDWR 2020e). The northern leopard frog (Lithobates pipiens) is fairly common in Utah, but some reports indicate that its numbers may be declining. This frog occurs in a variety of aquatic habitats, particularly near cattails and other aquatic vegetation; however, it may be found foraging relatively far from water. During cold winter months, it is inactive, and it takes cover underwater or in damp burrows (UDWR 2020f).	Corrected portions of common and scientific names.
WGFD	DEIS	3	151	Amphibians and Reptiles	"The Great Basin spadefoot (Spea intermontana) is a small toad found throughout the Great Basin, in a variety of habitats, ranging from dry sagebrush areas to spruce-fir forests. Predicted habitat occurs throughout much of Utah and much of the plan area (UDWR 2020h)."		Are there any Western (Boreal) Toads in the Ashley National Forest? WGFD has records near USFS lands on the northern edge of the Uinta Mountains. We recommend updating to reflect, if appropriate.

WGFD	DEIS	3	151	Amphibians and Reptiles	"Reptile species native to the planning unit include the midget faded rattlesnake (Crotalus oreganus concolor), terrestrial garter snake (Thamnophis elegans), smooth green snake (Opheodrys vernalis), and rubber boa (Charina bottae). The terrestrial garter snake, smooth green snake, and rubber boa may be found in or near aquatic areas, such as moist meadows and along streams (UDWR 2020i, 2020j, 2020k)."	Snake species native to the planning unit include the midget faded rattlesnake (Crotalus oreganus concolor), terrestrial garter snake (Thamnophis elegans), smooth green snake (Opheodrys vernalis), rubber boa (Charina bottae), and Great Basin Gophersnake (Pituophis catenifer deserticola). The terrestrial garter snake, smooth green snake, and rubber boa may be found in or near aquatic areas, such as moist meadows and along streams (UDWR 2020i, 2020j, 2020k). Midget Faded Rattlesnakes and Great Basin Gophersnakes are associated with rock outrcrops and the sagebrush community surrounding the Flaming Gorge National Recreation Area.	See comment below.
WGFD	DEIS	3	151	Amphibians and Reptiles		Lizard species native to the Ashley National Forest include the Greater Short-horned Lizard (Phrynosoma hernandesi), Northern Tree Lizard (Urosaurus ornatus wrighti), Plateau Fence Lizard (Sceloporus tristichus), and Northern Sagebrush Lizard (Sceloporus graciosus). Plateau Fence Lizards and Northern Tree Lizards are strongly associated with rock outcrops in the sagebrush and shrubland communities in the region.	We recommend splitting the reptile paragraph into snakes and lizards. Based on observations in our database, we recommend confirming whether Desert Striped Whipsnakes occur on the Ashley and updating the snake paragraph if appropriate. We also recommend confirming whether additional lizard species occur on the Utah portion of the Ashley National Forest.

WGFD	DEIS	3	159	Effects from Designated Areas	"Under all alternatives, the existing designated areas described in chapter 2 would remain. These include the Sheep Creek Canyon Geologic Area; the Ashley Gorge, Gates of Birch Creek, Lance Canyon, Pollen Lake, Sims Peak Potholes, Timber-Cow Ridge, and Uinta Shale Creek RNAs; the designated High Uintas Wilderness Area (276,175 acres); IRAs (637,700 acres); and two suitable wild and scenic river segments."		Why is the FGNRA not included as a designated area when it is defined as a designated area in Chapter 2 and the regulatory framework establishing the FGNRA is outlined later in Chapter 3? This should be better explained and/or the FGNRA should be included here as a defined designated area. If FGNRA is added, Tables 3-36 through 3-38 should be updated appropriately as should the text.
WGFD	DEIS	3	159	Effects from Designated Areas	"At-risk species associated with shrubland habitat, such as the pygmy rabbit and greater sage-grouse, would be impacted to a lesser extent from management for designated areas; this is because fewer acres of shrubland would be classified as a designated area (see table 3-35), and no greater sage-grouse or pygmy rabbit habitat would be classified as a designated area (table 3-37). However, ecosystem resilience may decline in designated areas over time due to the lack of habitat restoration and enhancement management (for example, a lack of mechanical vegetation management to minimize the possibility of beetle epidemics and large-scale, uncharacteristic fire). Shrubland habitat would also experience this impact to a lesser extent."	Only 500 acres of shrubland is included in the proposed designated areas (table 3-36), none of which are habitat for sage-grouse or pygmy rabbits (table 3-38). As such, at-risk species associated with shrubland habitat would not realize the same benefits as other species from management for designated areas.	Assuming FGNRA is not added as a designated area, there is no reason to discuss hypothetical limitations of designated areas when no habitat exists for either at-risk species identified.

WGFD	DEIS	3	259	Renewable Energy	"Other forms of renewable energy, such as wind power, solar, geothermal, and biomass energy, have not seen similar interest or development on the Ashley National Forest. This is partially due to the low potential for these resources, relative to other areas in the country. It is also because of competition from abundant nonrenewable energy sources, such as crude oil, natural gas, and coal in the immediate and surrounding areas (Forest Service 2017L)."	Other forms of renewable energy, such as wind power, solar, geothermal, and biomass energy, have not seen similar interest or development on the Ashley National Forest. This is partially due to the low potential for these resources, relative to other areas in the country. It is also because of competition from abundant nonrenewable energy sources, such as crude oil, natural gas, and coal in the immediate and surrounding areas (Forest Service 2017L). However, interest in renewable energy development is increasing and may result an increase in future development interest on the Ashley National Forest.	Interest in renewables is increasing and should be acknowledged.
WGFD	DEIS	3	263	Renewable Energy	"Renewable energy projects would not be permitted in these areas but would still be permitted across the rest of the national forest."		If renewable energy development is possible within the FGNRA, the stipulations for development in the State of Wyoming Greater Sage-grouse Core Area Protection Executive Order 2019-3 (or current) should be acknowledged. Sage-grouse Executive Order-related restrictions should be acknowledged when discussing any new development in Wyoming in core or non-core area habitat.
SHPO	DEIS	3	230	Cultural Resources		Table 3-66, Add the Lucerne Valley Petroglyph Site	While in the Flaming Gorge area, this recently listed historic property is also within the bounds of the Ashley and should be included here.
SHPO	DEIS, Appendix E	Attachment B	108	Cultural and Historic Resources	Timeline not included.	This plan will be developed within one year of implementation of the forest plan.	Sets a timeframe for accomplishing this task. This should also be included as a goal.

SHPO	DEIS, Appendix E	2	38-39	Cultural Resources	Addresses issues not identified in the plan.		The 2015 Land Management Plan developed by the Shoshone National Forest included a management strategy for developing a list of priority heritage assets that they intend to update annually. We recommend the Ashley develop a similar list and include this language in the Management Actions section: Priority heritage assets are inventoried and deferred maintenance condition surveys are completed at least every 5 years. Priority heritage assets are heritage assets of distinct public value that are, or should be, actively maintained and meet one or more of the following criteria: The significance and management priority of the property is recognized through an official designation, for example, listing in the National Register of Historic Places, State Register, etc. The significance and management priority of the property is recognized through prior investment in preservation, interpretation, and use. The significance and management priority of the property is recognized in an agency approved management plan. The designation of a priority heritage asset is a local management decision; the list of priority heritage assets on any given unit is dynamic. A list of priority heritage assets will be kept and updated annually. Priority heritage assets include some areas with significant heritage value, but are either small or do not rise to the level of having a specific management area designated to them. The Ashley will share the list of priority heritage assets with the appropriate Native American Tribes and Federal, state, and county officials upon request. The Ashley will also readily consider suggestions to include on the list for the Forest.

State Parks	DEIS	3	184-185	Tourism and Recreation		A table showing documented visitation for past surveys and projected trends should be included so that data is easily noted.	This forms the basis of recreation arguments throughout, but does not feel readily available or easy to digest.
State Parks	DEIS	3	184-185, 195	Tourism and Recreation		Is data available for various types of recreation? Wildlife-related user groups are mentioned on page 195, but a more complete table better defining the many uses seen in the Ashley would be useful. Some of this is presented later in Chapter 3 around page 278-279 but more charts, trends, and data would be helpful.	This data forms the basis of recreation assumptions made throughout this plan and, along with public comment, influenced the development of the various alternatives.
State Parks	DEIS	2	15	Sustainable Recreation	"Management is provided based on an assumption of moderate to heavy levels of dispersed recreation projected for the Ashley National Forest."	What are the numbers and expected trends to justify this assumption?	It is important for the reader to know what the increase in visitation is and how recreation use has changed. The USFS should also provide the change in socio-economic value to the surrounding community. This will be helpful in judging the direction the forest needs to go with its planning goals, conditions and objectives.
State Parks	DEIS	2	16	Social and Economic Contributions	"Alternative A is focused on a commodity-based approach and emphasizes economic output associated with forest resources. The economic importance of recreation is not emphasized, and contributions from ecosystem services are not specifically addressed."	This feels inconsistent with other goals of the plan. On page 10, Sustainable recreation was identified as a key focus of this plan. On page 15, recreation management is tied to an assumption of moderate to heavy levels of recreation.	It is important for the reader to know what the increase in visitation is and how recreation use has changed. The USFS should also provide the change in socio-economic value to the surrounding community. This will be helpful in judging the direction the forest needs to go with its planning goals, conditions and objectives.

State Parks	DEIS	2	19	Social and Economic Contributions	"Under alternative C, as under all alternatives, social and economic contributions from the Ashley National Forest would be retained."	Address how the shift towards backcountry and non-motorized recreation may shift the economics of the Forest. The economic multipliers are different across various recreation sectors.	It is important for the reader to know what the increase in visitation is and how recreation use has changed. The USFS should also provide the change in socio-economic value to the surrounding community. This will be helpful in judging the direction the forest needs to go with its planning goals, conditions and objectives.
State Parks	DEIS	3	47, 71	Effects from Recreation		There is no discussion in this document about sustainably built trails and other amenities which can mitigate or lessen the effects that trails and other recreation amenities can have on the environment. Seasonal closures and limited visitation are other potential management tools. *This is not the only section that this comment applies to- also relevant in watershed conversations, wildlife impacts, recreation, etc.	If alternatives are dismissed or graded on conditions that do not meet the best practice standards of the industry, the analysis of the four alternatives is flawed.
State Parks	DEIS	3		Throughout Chapter	"Objectives"	Objectives are mentioned throughout the Chapter 3 but are rarely clearly stated and easy to track throughout the analysis. No goals or options for meeting those objectives are given/or are rarely given.	See above comment about best practice standards and sustainable recreation/development standards. Construction does result in vegetative loss but can be guided to occur in less sensitive areas, can include restoration plans, etc.
State Parks	DEIS	3	78	Effects from Designated Areas	Section is missing from this page?		
State Parks	DEIS	3	217	Areas tribal Importance			Interpretation and education programs help enhance visitors' understanding and appreciation for the rich natural and cultural resources of the Ashley National Forest and the surrounding area, and build support for public lands.

State Parks	DEIS	3	274	Recreation			Need more information on conditions that apply to the well-developed Flaming Gorge National Recreation Area and how that area will be addressed in a separate plan. The development pressures in the FGNRA are different; their treatment will impact use in other zones of the Forest. Developing alternatives focused on one type of use, or even for one type of recreation, is a disservice to how many resources and services come from the Forest. Failing to adequately address the recreation desires of various audiences can also lead to resource degradation. Education is a major component as is providing different recreation groups opportunities across a geographical area (ie, motorized trail users should have opportunities to recreate within a certain radius of their home, but it doesn't need to be on Forest land if there are better alternatives). That requires partnerships, regardless of the Alternative selected. There needs to be more specific direction on how the FGNRA will be managed to maintain recreation opportunities and become a destination recreation area. This plan should be coordinated with the WY Outdoor Recreation Office as well as SW county planning.

State Parks	DEIS	3	274	Recreation, Partners			With the new FS shared stewardship, coordination is more than just responsivity; it means joint planning and implementation. There should be the intent on the part of the FS to coordinate future recreation planning with their partners. Both the state and county have outdoor recreation plans - to which the FS needs to coordinate with.
State Parks	DEIS	3	274	Recreation, Visitor Center/Visitor Infrastructure			Many Wyoming partners have expressed a desire to better coordinate use of the visitor centers and other local tourism resources to advertise recreation opportunities at FGNRA and to attract customers and users. The FS should consider finding a physical location within Green River that can serve as a point of information and direction for visitors to explore the FGNRA. There should be an advocate or liaison to help with advocating, educating and sharing recreation opportunities on the Ashley NF that is active in the surrounding Wyoming Communities. The USFS also needs to increase the outreach to attract visitors as they travel along I-80.In order to fully support the outdoor recreation industry and its growth there needs to be a contact/advocate for Ashley NF recreation opportunities. This should include a visitor center or other mechanism whereby visitors travelling to SW Wyoming can learn more about recreation opportunities. The FS should maintain their commitment to create a recreation plan for the FGNRA.

State Parks	DEIS	3	274	Recreation, Visitation			Need a goal for what kind of visitation increases are desired. Identify where visitors are being drawn from- local backyard users, or visitors coming from further distances impacts management considerations. The Forest Service should help the state and local governments meet their economic diversity goals in relationship to developing the outdoor recreation industry. Quality, well-maintained recreation facilities at key locations, accommodate use, enhance the visitor's experience, supports the states and counties outdoor recreation plan, and protect the natural resources of the area.Setting a goal in the plan is important as it impacts management and development pressures. FS should be a partner in supporting state plans to enhance outdoor recreation opportunities and industry.
State Parks	DEIS	3	274	Recreation, non-motorized trails			Can make use of the 1,200 miles of trails. Non-motorized single-track trails are developed to create a destination opportunity for mountain biking, horseback riding, and hiking creating a socio-economic benefit for residents and visitors alike. Just building trails will not always draw new or returning visitors. There needs to be a plan and a commitment to develop the trail system to draw people to it. Coordination with the county/city and state are very important in how this is created and developed as well as marketed.

State Parks	DEIS	3	274	Recreation, motorized trails			Demand indicates the need for motorized trails in the system, but curated placement and access to supporting infrastructure and consideration of other critical Forest aspects is key to resource protection.
State Parks	DEIS	3	283, 302, 305	Special Permits/Authorizations and Land Authorizations	Assumption is made that there will be no increase in special recreation permits, but demand is increasing for all types of authorizations. (not quoted directly as language varies)		How does the assumption that permits will not change square with the demand increasing? Needs more explanation as it will impact the level of development, public messaging, etc.
State Parks	DEIS	3	284	Effects from Recreation Management Area Designations		Recreation is spelled incorrectly on the last line of the page.	
State Parks	DEIS	3	287	Effects from Recreation Opportunities and Settings	"This alternative offers the most opportunities for recreation users seeking remote locations with few management controls on the ground, no facilities, and large areas offering solitude. Recreation users seeking developed recreation would have fewer opportunities under this alternative, compared with alternatives A and B. In addition, due to the emphasis on a primitive ROS setting, recreation users interested in both motorized and mechanized use may have fewer recreation opportunities under this alternative as compared to all other alternatives."		Better define recreation trends, show visitation data and recreation area usage, and development pressures to explain the development of the four alternatives. If most of the recreation pressure is on developed areas like the Flaming Gorge National Recreation Area, addressing backcountry users may not solve problems facing the Forest. Need to prove balance of backcountry, dispersed, and developed camping and other recreation uses to justify development. Show balance in accommodating multiple uses.
State Parks	DEIS	3	288				This entire page seems to suggest that Alternative D has minimal impacts but that doesn't pencil out when looking at the acreage impacts, the recreation use impacts, and other expected outcomes.

State Parks	DEIS	3	293	Table 3-82. Scenery Management by Alternative			The partial retention scenery management category seems quite high for Alternative D, and brings up questions about sustainable design of recreation resources.
State Parks	DEIS	2	20	Partnerships			In general, we are supportive of the Forest working to build partnerships with local, county, state, and other land management partners. We would like to see this ethos expanded to connect the other alternatives as it should be a general goal, not a component of one alternative.
State Parks	DEIS			General Comment			In general, it would help to see more information about current conditions aligned with desired conditions.
State Parks	DEIS			General Comment			Consistent formatting with more opportunities to see side-by-side comparisons of the four alternatives would make the document easier to read and would aid in providing consistent analysis.
State Parks	DEIS			General Comment			The alternatives presented fail to strike a balance between recreation desires and resource protection, and do not provide balanced opportunities for the many types of recreation that Forest users wish to see. We want to see more proactive management.

DUCHESNE COUNTY COMMISSION

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February 7, 2022

Submitted via electronic mail: https://www.fs.usda.gov/main/ashley/landmanagement/planning

Ms. Susan Eickhoff
Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, Utah 84078

Subject: **Ashley National Forest Plan Revision Draft EIS**

Dear Susan:

Duchesne County has reviewed the Ashley National Forest Plan Revision Draft Environment Impact Statement (DEIS). The county appreciated participating as a Cooperating Agency in the preparation of the Forest Plan Revision and the DEIS. The county has previously submitted comments on the administrative draft of the DEIS and reaffirms those comments and incorporates them by reference. Alternative D seems most consistent with the County's interests. The Forest Service has addressed many of the county's comments in the DEIS, but numerous concerns remain. At this stage, Duchesne County offers the following general and technical comments for your consideration.

General Comments

Future management of the Ashley National Forest is very important to the county and citizens who use the forest for a wide variety of recreation activities or to generate income for their families. Decades of passive forest management under the current plan has led to unhealthy forest conditions which make it ripe for disease and uncharacteristic wildfire.

Cooperation, Coordination and Consistency

Under NEPA, all Federal Agencies must complete a NEPA analysis for proposed actions that are likely to have an impact on the natural or human environment, such as this forest plan revision. Federal Agencies can designate State and Local Governments to become formal partners in the NEPA process, as Cooperating Agencies. A State or Local Government can be a Cooperating Agency when it has special expertise with respect to any environmental impact involved in the project proposal. Cooperating Agency status gives the State or Local Government early input into NEPA analyses and some ability to shape the goals and framework of the Federal proposal. The county appreciates the opportunity to have served as a Cooperating Agency through the process of developing this environmental analysis.

When creating Land Use Plans, the USFS is required to coordinate their Plans with State and Local Government plans. Coordination is a separate process from Cooperation and must occur regardless of whether State or Local Governments were designated Cooperating Agencies. Agencies must make efforts to draft Federal Plans that coordinate with State and Local Plans.

The National Forest Management Act requires the USFS to coordinate with local governments but does not specify how the process of coordination is to be accomplished.

Forest Service regulations require:

- Responsible officials coordinate with local governments.
- Responsible officials shall review local plans and policies that are relevant to the federal plan. The review will consider the objectives of local plans, the compatibility and interrelated impacts between local and federal plans, opportunities to address impacts and contribute to joint objectives, and opportunities to resolve or reduce conflicts. This review must be included in the NEPA document.
- The responsible official will not direct or control management of lands outside of the planning boundary.

Consistency between federal, state, local, and tribal plans is the desired outcome for the coordination and cooperation processes required of federal agencies. The importance of coordination and cooperation between state, local, and Federal agencies during planning processes cannot be overstated. Early involvement and equal consideration in environmental reviews, as Interdisciplinary Team members, stakeholders, and Cooperating Agencies was the State's and County's main objective and motivation for creation of the State Resource Management Plan (SRMP) and County Resource Management Plans (CRMP). The SRMP and CRMPs shall be followed unless inconsistent with any federal statute or duly promulgated regulation.

Page 6 of the DEIS states that: *"The Forest Service collaborated with cooperating agencies throughout the planning process to consider ways the forest plan could contribute to common objectives, address impacts, resolve or reduce conflicts, and contribute to compatibility between the Forest Service and other agencies' plans."*

The county requests that the DEIS be amended to recognize that some of the cooperating agencies have their own resource management plans (such as the State of Utah and all of the Utah counties) and indicate whether the USFS intends for the forest plan to be consistent with these state and county plans to the greatest degree possible.

Page 11 of the DIES states that: *"The Forest Service also received comments on specific wildlife concerns, including management of bighorn sheep."*

The county requests that the DEIS recognize here that the USFS does not manage bighorn sheep or any other type of fish or wildlife. Such is the responsibility of state wildlife management agencies. The DEIS should indicate the type of coordination that occurs between the USFS and

the state wildlife management agencies and how the results of such coordination are reflected in the forest plan revision.

Page 323 of the DEIS addresses *"Plan Consistency Review."* Unfortunately, there is no mention in this section of several inconsistencies between alternatives B & C and Utah State and county resource management plans identified in this letter.

Several areas of inconsistency between the proposed forest plan and its alternatives are discussed below.

Special Designations (Wilderness & Wild and Scenic Rivers)

Page 5 of the DEIS states that: *"Such temporary classifications do not guarantee formal designation, but they do influence forest plan guidance of how to manage the recommended areas."*

The county's position is that there is no "temporary classification" established when a recommendation is made for a wild and scenic river or wilderness designation. Only Congress has the authority to "classify" lands or waters as wilderness or wild and scenic rivers. Instead, the term "recommended designation" (see footnote 1 in Table 2-1) should be used.

Page 12 of the DEIS states that: *"All alternatives will provide management direction in keeping with language in legislative direction for the designated High Uinta Wilderness Area (276,175 acres on the Ashley National Forest). Inventoried roadless areas (approximately 637,700 acres on the Ashley National Forest) will be managed in accordance with relevant regulations."*

This acreage data for the HUWA does not appear to be correct. There are over 289,000 acres of High Uinta Wilderness area in Duchesne County alone. Pages 69 and 70 indicate that there are 274,000 acres of HUWA in the Ashley NF and Page 158 indicates 276,175 acres. Which acreage is correct?

Page 17 of the DEIS states that: *"Alternative B would add additional designated areas to protect special resources. This alternative would include management of two recommended wilderness areas (see appendix A, figure 2-21)."*

Establishing additional wilderness areas on the forest in Duchesne County is inconsistent with the Duchesne County Resource Management Plan (CRMP) [https://rmp.utah.gov/duchesne-county/] and the State of Utah Resource Management Plan (SRMP) [https://rmp.utah.gov/state-of-utah-resource-management-plan/]. A significant portion of Duchesne County's land area (13.82%) is already under wilderness designation. These lands, additional wilderness acreage in adjoining counties and inventoried roadless areas on the Ashley National Forest provide ample opportunities for persons seeking solitude.

The Duchesne CRMP, in Section 23, contains the following policies associated with Wilderness:

1. *The county's support for any recommendations made under a statutory requirement to examine the wilderness option during the revision of land and resource management plans or other methods will be withheld until the following are clearly demonstrated that:*

a. *The adopted transportation plans of the state and county or counties within the federal land management agency's planning area (National Forest or BLM land) are fully and completely incorporated into the baseline inventory or information from which plan provisions are derived.*

b. *Valid state or local roads and rights-of-way are recognized and not impaired in any way by the recommendations.*

c. *The possibility of future development of mineral resources by underground mining or oil and gas extraction by directional or horizontal drilling or other non-surface disturbing methods are not affected by the recommendations.*

d. *The need for additional administrative or public roads necessary for the full utility of the various multiple uses, including recreation, mineral exploration and development, forest health activities, operation and maintenance of water facilities, and grazing operations on adjacent land, or on subject lands for grand-fathered uses, are not unduly affected by the recommendations.*

e. *Analysis and full disclosure are made concerning the balance of multiple-use management in the proposed areas.*

f. *The analysis compares the full benefit of multiple-use management to the recreational, forest health, and economic needs of the state and the county to the benefits of the requirements of wilderness management.*

g. *The conclusion of all studies related to the requirement to examine the wilderness option are submitted to the county for review and action, and the results in support of or in opposition to, are included in any planning documents or other proposals that are forwarded to the United States U.S. Congress.*

h. *Areas must merit the suitability requirements contained in the Wilderness Act of 1964 unless requirements are changed by U.S. Congress.*

3. *Any proposed wilderness designations in the county forwarded to U.S. Congress for consideration must be based on a collaborative process in which support for the wilderness designation is unanimous among federal, state, and county officials.*

8. *In accordance with Utah Code 63J-8-104 (b) and (c), it is the policy of the county that federal land management agencies shall:*

a. *Not designate, establish, manage, or treat any of the subject lands as an area with management prescriptions that parallel, duplicate, or resemble the management prescriptions established for wilderness areas or WSAs, including the non-impairment standard applicable to WSAs or anything that parallels, duplicates, or resembles that non-impairment standard.*

b. *Recognize, follow, and apply the wilderness settlement agreement between the State of Utah and the U.S. Department of the Interior.*

c. *Revoke and revise BLM Manuals H 6310, 6320, and 6330.*

d. *Recognize that BLM lacks congressional authority to manage subject lands, other than WSAs, as if they are or may become wilderness.*

e. *Recognize that even if BLM were to properly inventory an area for the presence of wilderness characteristics, BLM still lacks authority to make or alter project level decisions to automatically avoid impairment of any wilderness characteristics without express congressional authority to do so.*

The Utah SRMP, page 230, contains the following policies associated with Wilderness:

- *The State of Utah supports the continued management of Wilderness Areas as wilderness, in accordance with the Wilderness Act and when management provides for public enjoyment and active management under the Act.*
- *The State of Utah recognizes BLM Wilderness Study Areas recommended by the BLM during or before June 1992, in accordance with FLPMA.*

The State of Utah and Duchesne County opposes the recommendation of new Wilderness Study Areas subsequent to June 1992.

- *The State of Utah will actively participate in all public land management planning activities.*
- *The State of Utah opposes any legislation introduced in Congress to designate additional Wilderness Areas except for legislation introduced by a member of Utah's congressional delegation.*
- *The State of Utah opposes any legislation introduced in Congress to designate additional Wilderness Areas unless such legislation is supported by the respective county commission or county council in the county impacted by the proposed legislation.*
- *The State of Utah will actively participate with federal partners in making wilderness management plans.*
- *The State of Utah opposes the management of non-wilderness federal lands as de facto wilderness, including "wildlands," "lands with wilderness characteristics," "wilderness inventory areas," and other such administrative designations.*
- *The State of Utah opposes the review of additional U.S. Forest Service lands for wilderness, except for the reviews expressly provided for in the Utah Wilderness Act of 1984, §201(b).*

    1. *(a) secure for the people of Utah, present and future generations, as well as for visitors to Utah, the benefits of an enduring resource of wilderness on designated state-owned lands.*

Considering these state and county policies, the wilderness recommendations of alternatives B and C must not be selected. The only alternatives that would be consistent with state and county polices associated with wilderness are A and D.

Effects of Wilderness Management on Forest Health

Page 71 of the DEIS states that: *"Wilderness management protects riparian and wetland ecosystems through minimizing ground disturbance, eliminating motorized access, and reducing recreation use, all of which reduce impacts on riparian and wetland vegetation and inhibit the spread of nonnative species."*

This may be true in the short term, but the "hands-off" approach to wilderness management increases the long-term risk of uncharacteristic wildfire, which can destroy riparian and wetland ecosystems.

Page 71 of the DEIS also states that: *"Hydrologic processes can be adversely affected by management activities, such as fire suppression, prescribed fire, timber extraction, fuels reduction, noxious weed treatments, road construction, recreation, and livestock grazing."*

It should be recognized here that hydrologic processes can also be adversely affected by the lack of management activities in special designation areas such as wilderness. The inability to conduct restoration projects in wilderness area will hamper efforts to restore watersheds inside wilderness to properly functioning condition.

Page 73 of the DEIS states that: "*In turn, 1,670 acres of riparian vegetation communities, 1,000 acres of wetland vegetation, and 960 acres of possible or likely fens would receive increased protection through designation of these river corridors (table 3-9)."*

The 42 miles of the Uinta River tributaries suitable for WSR designation are within the High Uintas Wilderness Area; so WSR designation really doesn't provide increased protection; the protection against management activities, such as timber harvest, is already in place. Multiple layers of special designations within wilderness are not necessary.

Page 117 of the DEIS states that: *"Terrestrial vegetation would be subject to wilderness management direction, as described in "Environmental Consequences for Terrestrial Vegetation Common to All Alternatives, in these areas."*

Here would be a good place to recognize that wilderness management direction relies on natural processes, which removes many tools otherwise available to benefit terrestrial vegetation communities.

Page 119 of the DEIS states that: *"Terrestrial vegetation types, primarily alpine and conifer forest, would be subject to wilderness management direction, as described previously."*

Again, the county requests that the document be amended here to recognize that wilderness management direction removes many tools otherwise available to benefit terrestrial vegetation communities.

Page 119 of the DEIS states that: *"Alternative D also allows for minimum impact suppression tactics only in wilderness. Emphasis is to manage fire for protecting developed resources and would have limited focus to maintain or improve terrestrial vegetation types."*
It is important to have flexibility in the forest plan to suppress naturally occurring fires in wilderness before they spread out of wilderness areas and do tremendous damage to ecosystems. The county recommends adding this flexibility to Alternative B.

Effects of Wilderness Management on Recreation

Page 15 of the DEIS states that: "*Mechanized travel (i.e., mountain bikes) is permitted on existing roads and trails."*

E-bikes are growing in popularity as they offer an alternative mode of transportation for those physically unable to pedal a mountain bike over steeper terrain. The DEIS should indicate whether "e-bikes" are considered motorized travel or mechanized travel and if they would be permitted in special designation areas on the Ashley National Forest.

Page 185 of the DEIS (Table 3-52) indicates that the visitor satisfaction levels in designated wilderness areas, (associated with developed facilities and services) rates at 96.6% satisfaction. This data seems suspect when there are no developed facilities or services allowed in wilderness areas.

Page 205 of the DEIS states that: "*Access for recreation would also be maintained for all communities. However, the level of access and the recreational experience may be affected by variation in management areas that restrict future motorized access (i.e., recommended wilderness)."*

The county requests that the DEIS be amended here to recognize that wilderness areas restrict access to citizens with mobility disabilities and the elderly; many of which also have low incomes and should be part of the environmental justice considerations.

Page 206 of the DEIS states that: *"As discussed in the recreation section, users looking for solitude may have limited opportunities in the Ashley National Forest due to high demand and limited ROS classes with these opportunities." Page 207 states that: "However, communities valuing solitude and naturalness for cultural uses may have limited options in the long term."*

The county questions these conclusions that there may be limited opportunities/options for solitude considering there are at least 276,175 acres of High Uintas Wilderness on the Ashley National Forest (with even more acreage on the Uinta-Wasatch-Cache NF) and some 637,700 acres of Inventoried Roadless Areas on the Ashley NF that provide ample land area for solitude seekers.

Effects of Wilderness Management on the Timber Industry

Page 211 of the DEIS states that*: "In addition, alternative C has the lowest level of forest product removal of the action alternatives. This is because of an emphasis on natural processes for vegetation management and an increase in the acres managed as recommended wilderness areas and backcountry recreation areas where timber harvest would be restricted. This*

alternative would result in the lowest availability and removal of forest products and the associated economic effects related to the timber industry. Economic effects of forest product removal under alternative C would support 35 jobs and $1.8 million in labor income in the local economy, annually."

Page 244 of the DEIS states that: *"Alternative B would introduce two additional areas for recommendation as wilderness, totaling approximately 10,300 acres. These newly recommended wilderness areas would prohibit timber production to maintain the option for future designation as wilderness, thus reducing the acres suitable for production when compared with alternative A."*

Page 245 of the DEIS states that: *"Alternative C would include the most acres managed to maintain wilderness characteristics; no acres would be found suitable for timber harvest within these areas to preserve the suitability of these areas for wilderness designation. Alternative C would also introduce additional miles of suitable [streams] for inclusion in the NWSRS. This would reduce the available acres for timber harvest."*

The reduction of lands suitable for timber production in favor of additional wilderness acreage under alternatives B and C would be inconsistent with adopted state and local resource management plan policies as follows:

Duchesne CRMP, page 31:

6. Duchesne County supports the wise use, conservation and protection of public lands and their resources, including well-planned management prescriptions. It is the County's position that public lands be managed for multiple uses, sustained yields, prevention of waste of natural resources, and to protect the health, safety and welfare of the public. It is important to the County economy that public lands be properly managed for fish, wildlife, livestock production, timber harvest, recreation, energy production, mineral extraction and the preservation of natural, scenic, scientific and historical values.

Duchesne CRMP, page 35:

It is the policy of Duchesne County that:

Multiple-use and sustained-yield management means that federal agencies should develop and implement management plans and make other resource-use decisions that:

Are designed to produce and provide the desired vegetation for the watersheds, timber, food, fiber, livestock forage, and wildlife forage, and minerals that are necessary to meet present needs and future economic growth and community expansion without permanent impairment of the productivity of the land;

Duchesne CRMP, pages 40-41

Vegetation Management Policies for Special Designation Areas

In special designation areas, permittees, local, state, and federal entities shall cooperate, consult and coordinate in order to actively manage vegetation with a full range of management tools and techniques including, but not limited to, mechanical, chemical, agricultural, natural, or other methods as deemed necessary by the permittee or entity. Duchesne County finds the unhealthy state of the forest and timber resources in the County to be unacceptable. Duchesne County supports proper and active management of forest resources, as well as the myriad of resources that will be adversely affected by catastrophic wildfire. Such active management requires logging, motorized access, mechanical and chemical treatments, as well as monitoring, thinning, reclamation and seeding.

Duchesne CRMP, page 42

Watershed Policies in Special Designation Areas

Vegetation management projects in watershed areas shall include restoration and removal or timber to limit wildfire impacts, protect riparian areas, ensure appropriate water flows and enhance water flows.

Duchesne CRMP, page 146

Forest Management Policies

Management strategies shall protect timber resources from fire (in accordance with the National Fire Plan), insects, and disease. Such management strategies shall provide for proper vegetation management practices so that excessive fuel loading and high intensity fires do not damage soil productivity.

Duchesne CRMP, page 312

Inventoried Roadless Area Policies

Managing public lands for "wilderness characteristics" circumvents the statutory wilderness process and is inconsistent with the multiple-use and sustained-yield management standard that applies to all BLM and USFS lands that are not wilderness areas or WSAs and adversely affects the counties' economy in terms of the grazing, tourism, oil and gas extraction, mining, timber industries, and water resource development.

Utah SRMP, page 114

Forest Management Policies:

Encourage timber harvesting to prevent fuel load and biomass buildup.

Encourage prompt removal and salvage of drought, fire, and beetle killed timber and reseed or replant as appropriate to maintain healthy forests and watersheds.

Utah SRMP, page 134

The State of Utah supports the concept of multiple-use and sustained yields on public lands. Federal lands should be managed to produce the maximum yield of timber, forage, recreation, and minerals at sustainable levels. Agriculture is an integral part of the multiple-use concept.

Utah SRMP, page 238

§ 63J-4-401. Planning duties of the planning coordinator and office

(6) The state planning coordinator shall recognize and promote the following principles when preparing any policies, plans, programs, processes, or desired outcomes relating to federal lands and natural resources on federal lands pursuant to this section:

(ii) multiple-use and sustained-yield management means that federal agencies should develop and implement management plans and make other resource-use decisions that:

(D) are designed to produce and provide the desired vegetation for the watersheds, timber, food, fiber, livestock forage, and wildlife forage, and minerals that are necessary to meet present needs and future economic growth and community expansion without permanent impairment of the productivity of the land;

Effects of Backcountry Management areas on Recreation

Page 71 of the DEIS states that: *"In general, watersheds with more than 1 mile of road per square mile can be considered to have moderate to high road density (Forest Service 2011c)."*

The county disagrees with this general consideration regarding road density. If a road were 20 feet wide, a mile of road would occupy 105,600 square feet or 2.42 acres of a 640-acre square mile. This is only .00378 percent of a square mile occupied by roads; which is hardly a moderate to high road density.

Page 211 of the DEIS states that… *"Recreation experience—As under alternative B, alternative C would include the establishment of recreation management areas. Under alternative C, however, recreation emphasis would focus on expanded backcountry management areas and further restrict motorized use in these areas. This alternative also has the most acres set aside as proposed wilderness, and it includes additional stream segments managed as suitable for inclusion in the NWSRS."*

This reduction of motorized recreation opportunities under alternative C in favor of additional wilderness and backcountry management areas would be inconsistent with adopted state and local resource management plan policies associated with motorized recreation as follows:

Duchesne CRMP, page 244

Public land agencies shall limit OHV's to trails, roads, or areas specifically designated by the agency for that purpose. However, ***the availability and mileage of such trails***

> ***should be expanded to meet demand*** *and provide OHV loops that connect communities. Open area riding as well as looped and stacked trail systems should be offered, with a variety of levels of trail difficulty.*
>
> Duchesne CRMP, page 247

In accordance with Utah Code 63J-8-104(g), federal land management agencies shall achieve and maintain traditional access to outdoor recreational opportunities available on federal lands as follows:

> *Hunting, trapping, fishing, hiking, camping, rock hounding, OHV travel, biking, geological exploring, pioneering, recreational vehicle camping, and sightseeing are activities that are important to the traditions, customs, and character of the county and should be allowed to continue.*
>
> Duchesne CRMP, page 248
>
> *Existing levels of motorized public access to traditional outdoor recreational designations in the county must be continued, including both snow machine and OHV use, in areas where resource damage is unlikely to occur.*
>
> Utah SRMP, page 185
>
> *§ 63J-8-104. State land use planning and management program*
>
> *(g) achieve and maintain traditional access to outdoor recreational opportunities available in the subject lands as follows:*
>
> *(i) hunting, trapping, fishing, hiking, family and group parties, family and group campouts and campfires, rock hounding, OHV travel, geological exploring, pioneering, recreational vehicle parking, or just touring in personal vehicles are activities that are important to the traditions, customs, and character of the state and individual counties where the subject lands are located and should continue.*

Effects of Backcountry Management areas on Timber Industry

Page 245 of the DEIS states that: *"Under alternative C, there would be an emphasis on management of recreation areas to improve the backcountry experience for recreationists, unlike under alternative A. This management would increase the acreage of backcountry management areas and would prohibit timber harvest within them. This would result in the decreased number of acres suitable for timber production and harvest."*

Reduction of lands suitable for timber harvest in favor of backcountry management areas would be inconsistent with adopted state and local resource management plan policies, (see policies previously listed under "Effects of Wilderness Management on the Timber Industry)."

Effects of Alternatives B and C and special designations on Grazing

Page 18 of the DEIS states that: *"Under alternative B, forage for livestock grazing would have specific utilization levels included in management (50 percent) as well as 4-inch stubble height guidelines to provide criteria to help meet desired conditions for terrestrial vegetation."*

Establishing one-size-fits-all utilization levels and stubble height guidelines is inconsistent with the county and state resource management plans. If exceptions or on-site modifications are allowed under Alternative B, please indicate here. A more flexible, adaptive management approach, such as proposed in Alternative D, accounting for range conditions at site-specific locations, should be used to meet desired conditions.

Pages 210-211 of the DEIS state that: *"An alternative assumption (that all affected pastures would be closed and not proportionally reduced) would result in a larger reduction of HMs—a loss of 3,318 HMs—and a small, but measurable, impact on the regional economy. Whether the entire pastures would be closed would depend on whether the management areas could be managed to restrict cattle (for example, with fencing, natural barriers, or herding). The closure of these allotments would result in an estimated loss of 7 jobs and $120,000 in labor income on an average annual basis. This would result in the lowest estimated HMs of all alternatives and the lowest level of economic effects, in terms of jobs and income related to livestock grazing."*

Pages 251-252 of the DEIS state that: *"The most likely impact from management of recommended or designated wilderness would be alterations to the timing and intensity of grazing operations to meet desired conditions to maintain wilderness character. Other potential impacts on grazing management due to recommended or designated wilderness include impacts to access of allotments for maintenance of structural range developments, the ability to haul salt and minerals, and the retrieval of sick animals due to restrictions on motorized use."*

Page 253 of the DEIS states that: *"Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches unless monitoring indicates a different level sufficient to meet and maintain desired conditions (table 3-68). In areas where these guidelines are not met and exceptions are not made, there could be modifications to the timing and intensity of grazing operations, particularly adjustments to livestock numbers or season of use, or both, and associated reductions in numbers and season of use permitted to grazing operators, when compared with alternative A."*

Page 254 of the DEIS states that: *"Under alternative C, forage for livestock would be limited to a level of 40 percent utilization and a stubble height of 4 inches (table 3-71). Exceptions will not be made for utilization levels and stubble-height guidelines."*

The one-size-fits-all utilization and stubble height standards and restricting the timing and intensity of grazing in favor of increased areas managed to maintain wilderness characteristics under Alternatives B and C (see previous four references above) is inconsistent with adopted state and local resource management plan policies listed below. The flexibility in Alternative D is preferable.

Duchesne CRMP, page 34

BLM and Forest Service land use plans should produce planning documents consistent with state and local land use plans to the maximum extent consistent with federal law and FLPMA's purposes, by incorporating the state's land use planning and management program for the subject lands that preserve traditional multiple use and sustained yield management on the subject lands to:

1. *Achieve and maintain in perpetuity a high-level annual or regular periodic output of agricultural, mineral, and various other resources from the subject lands;*
2. *Support valid existing transportation, mineral, and grazing privileges in the subject lands at the highest reasonably sustainable levels;*

Duchesne CRMP, pages 97-100

Consistent with the state laws associated with grazing on federal lands, it is the position of Duchesne County that:

Well managed livestock grazing, though poorly understood by the average citizen, is the most effective way to manage vegetation on a large scale to benefit watershed health and preserve wildlife habitat.

Improving grazing management on Duchesne County's private and public lands should be viewed as a long-term priority.

***Public lands shall be managed to maintain or increase forage allocation for livestock grazing**. Annual monitoring should be done to verify whether desired conditions are being maintained.*

***Public land agencies shall maintain livestock grazing permits and grazing allocations at present levels** unless a study of rangeland conditions justifies increased or decreased grazing. The county recognizes that drought, wildfire, and other factors may affect the terms of grazing permits.*

***The County opposes the reduction, relinquishment, or retirement of grazing animal unit months in favor of conservation, wildlife, and other uses.** Any decreases should be temporary in nature due to ever-changing range conditions. The county expects the Utah Division of Wildlife Resources to coordinate with land management agencies as they manage forage and grazing allotments for the benefit of livestock and wildlife populations.*

Land management plans, programs, and initiatives should provide that the amount of domestic livestock forage, expressed in animal unit months, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of animal unit months sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.

The County favors the best management practices that are jointly sponsored by cattlemen's, sportsmen's and wildlife management groups such as chaining, logging, seeding, burning, and other direct soil and vegetation prescriptions that are demonstrated to restore forest and rangeland health, increase forage, and improve watersheds in grazing districts and allotments for the mutual benefit of domestic livestock and wildlife. When the practices described above increase a grazing allotment's forage beyond the total permitted forage use that was allocated to that allotment in the last federal land use plan or allotment management plan still in existence as of January 1, 2005, a reasonable and fair portion of the increase in forage beyond the previously allocated total permitted use should be allocated to wildlife as recommended by a joint, evenly balanced committee of livestock and wildlife representatives that is appointed and constituted by the governor for that purpose. The County favors quickly and effectively adjusting wildlife population goals and population census numbers in response to variations in the amount of available forage caused by drought or other climatic adjustments, and state agencies responsible for managing wildlife population goals and population census numbers will give due regard to both the needs of the livestock industry and the need to prevent the decline of species to a point where listing under the terms of the Endangered Species Act when making such adjustments.

Access to public rangeland is a valid existing right that is vital to the permit-holders and the land management agency for planning, management, and development. Access shall be maintained open and shall be improved as management needs require.

Reductions in domestic livestock animal unit months must be temporary and scientifically based upon rangeland conditions. Reductions in AUMs should be allocated on a species basis [wildlife, wild horse, wild burros & livestock] with a percentage allocated to each species type. The only justification for decreasing domestic livestock grazing AUM's is for there to be a valid and documented scientific finding that the range district will no longer support the AUM's in question. The BLM and Forest Service are expected to comply with and honor the domestic grazing preference on grazing districts. Likewise, the permittee is also expected to abide by the terms and conditions identified in the grazing permit.

Federal policies, plans, programs, initiatives, resource management plans, and forest plans may not allow the placement of grazing animal unit months in a suspended use category unless there is a rational and scientific determination that the condition of the rangeland allotment or district in question will not sustain the animal unit months sought to be placed in suspended use. Any grazing animal unit months that are placed in a suspended use category should be returned to active use when range conditions improve.

Federal policies, plans, programs, and initiatives related to vegetation management should recognize and uphold the preference for domestic grazing over alternate forage uses in established grazing districts while upholding management practices that optimize and expand forage for grazing and wildlife in conjunction with state wildlife management plans and programs in order to provide maximum available forage for all uses. In established grazing districts, animal unit months that have been reduced due to rangeland health concerns should be restored to livestock when rangeland conditions improve and should not be converted to wildlife use.

> ***Management decisions shall be based on the individual range allotment condition*** *and not on the overall condition of surrounding lands. Increases in available forage resulting from the conservation practices of livestock permit-holders shall not be allocated or credited to other uses.*
>
> *Changes in season of use or forage allocation must not be made without full and meaningful consultation with permittee. The permittee must be the first point of contact.* ***The continued viability of livestock operations and the livestock industry shall be supported on federal and state lands within Duchesne County by management of the lands and forage resources and the optimization of animal unit months for livestock*** *in accordance with the multiple-use provisions of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et seq., the provisions of the Taylor Grazing Act of 1934, 43 U.S.C. 315 et seq., and the provisions of the Public Rangelands Improvement Act of 1978, 43 U.S.C. 1901 et seq.*
>
> Utah SRMP, page 149
>
> *The State of Utah supports the concept of multiple-use and sustained yields on public lands. Livestock grazing is an integral part of the multiple-use concept. Reductions of livestock numbers through frivolous lawsuits and barriers to infrastructure improvements and maintenance necessary for effective grazing management are unacceptable.*
>
> Utah SRMP, page 140
>
> *The state of Utah adopts a no-net-loss stance concerning grazing AUMs on federal lands.*

Page 255 of the DEIS states that*: "Alternative C would have the highest percentage of the Ashley National Forest managed as designated areas; however, none of the acreage of the proposed designated areas overlapping current grazing allotments would preclude grazing. Some impacts may occur, however, related to the ability to access and maintain allotments in proposed wilderness areas, as described under "Environmental Consequences for Livestock Grazing Common to All Alternatives.""*

Although grazing would not be precluded in new designated areas under Alternative C, the restrictions on the ability to access and maintain allotments in proposed wilderness areas would be inconsistent with state and county resource management plan policies listed above.

Effects of Alternatives B and C Scenery Requirements on Utilities and Infrastructure

Page 273 of the DEIS states that: *"The prohibition of new communication sites, roads, utility corridors, and other infrastructure in recommended wilderness areas would be the same as described under alternative B; however, recommended wilderness would occur over a greater area of the national forest. This would constitute 50,200 acres under alternative C, compared with 10,300 under alternative B. Any maintenance to dams, bridges, and administrative and drinking water facilities would require methods designed to ensure preservation of wilderness values. This would result in increased maintenance costs associated with compliance."*

Another reason that Alternative C is not acceptable to state and local governments is the increased costs of maintaining water infrastructure in wilderness areas or wilderness study areas. For example, recent stabilization of a high mountain lake in the High Uintas Wilderness cost some $600,000 more than it normally would have due to the requirement to airlift equipment to the job site by helicopter.

Page 296 of the DEIS states that: *"Under alternative C, SIO acres would be assigned to the forest, as shown in table 3-84 (see figure 2-10). Alternative C would increase the number of acres in areas where the management emphasis would maintain or enhance the valued scenic character. This is because 74 percent of the lands would have high or very high SIOs, compared with 51 percent under alternative A."*

This high percentage of high or very high SIO's under Alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with state and local resource management plans policies set forth in this letter, including the provision of utilities and infrastructure, such as communication towers and transmission lines needed to serve a growing population and a growing renewable energy power grid.

Page 297 of the DEIS states that: *"Every 5 years, the Forest Service would consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternative A."*

If the need for an easement arose, a proponent should not have to wait for the beginning of the next 5-year review period before such easement could be considered. The annual review in alternative D is preferable for flexibility in responding to easement requests.

Page 299 of the DEIS states that: *"Therefore, when combined with the impacts described above from reasonably foreseeable future actions, alternative C would have the fewest cumulative impacts on the scenic character."*

While Alternative C would preserve scenic character to the greatest degree, this high percentage of high or very high SIO's under Alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with state and local resource management plan policies contained in this letter.

Page 304 of the DEIS states that: *"Recent increased activity in large transmission projects, such as the Zephyr, Energy Gateway South, and Transwest Express projects, demonstrates that along with increased interest in communication uses and technologies, the demand for enhanced energy infrastructure and electrical connectivity is on the rise and is expected to increase."*

The high percentage of high or very high SIO's under Alternative C would likely impact the ability of the Ashley National Forest to accommodate these increasing demands for energy transmission infrastructure to the detriment of clean energy development and reliability of the power supply in the western grid.

Technical Comments

The remainder of our comments focus on sections of the DEIS where corrections are needed, or additional statements should be added to the analysis or conclusions. Text shown in **bold, underlined type** indicates text that should be added to the DEIS. Text in **bold type** indicates suggestions for improvement of the DEIS or reasons for the edits suggested. Text that is overstruck should be removed from the DEIS. The county believes that these edits will better inform the decision maker of the implications of the various alternatives and lead to a better result. These comments are as follows and are listed by DEIS page number:

Page

S-1 The Forest Service has prepared this draft environmental impact statement (**D**EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and state laws and regulations.

1 The Forest Service has prepared this **draft** environmental impact statement (**D**EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and state laws and regulations.

2 Typical uses and activities include land- and water-based recreation (such as camping, hiking, boating, and all-terrain vehicle [ATV] **or off-highway vehicle [OHV]** riding),

2 Portions of the Forest are within the original Uintah and Ouray Indian Reservation. Local Native American tribes value the lands on the Ashley National Forest for hunting and gathering, ceremonial and traditional uses, and ancestral connections. **This text is repetitive of text appearing earlier on the page and should be deleted.**

5 NEPA requires the Forest Service to coordinate planning with other Federal agencies that have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (see 40 CFR 1501.8+. **Should be (see 40 CFR 1501.8).**

7 Chapter 1. Purpose of and Need for Action: ~~The~~ **This** chapter includes information on the history of the project proposal, the purpose of and need for the project, and the agency's proposal for achieving that purpose and need.

7 This chapter summarizes the information used to compare alternatives **and** contains the detailed basis used to measure the potential environmental consequences of each alternative.

11 ~~Issues~~ **Commenters** brought up the need to identify high-risk areas for wildfire and employ a variety of methods to treat fire.

16 For livestock grazing, forage utilization and stubble height under alternative A would be determined based on site specific conditions to meet land health standards and based on individual AMPs and permit terms and conditions. **The acronym "AMP" should be included in the list of acronyms on Pages vii - viii of the DEIS.**

18 Management under alternative B would also support the maintenance and improvement of resilient ecosystems and watersheds to support wildlife diversity; it would provide ecological conditions to maintain a viable population of each SCC **and common and abundant species** within the plan area ~~and common and abundant species~~.

18 Specifically for bighorn sheep, management has been included to limit authorization of new permitted domestic sheep or goat allotments unless separation from domestic sheep and goats can be demonstrated, or research **and consultation with state wildlife management agencies** indicates that the potential for pathogen transfer would be limited.

19 Increased restrictions on resources uses, such as timber, would support ecosystem services associated with clean water~~, including municipal water supplies~~**. Restricting timber harvest may enhance water quality but would likely reduce the quantity of water produced by a watershed, which would negatively impact municipal water supplies.**

19 In addition, when domestic ~~sheet~~ **sheep** or goat grazing permits are voluntarily waived without preference, and if the allotment does not provide separation from bighorn ~~sheet~~ **sheep**, the allotments would be closed to provide separation between domestic sheep and goats and bighorn sheep.

24 Table 2-2 and Pages 207, 210, 247, 249, 250, 251, 252: **The acronym "HMs" is not listed in the acronyms listed on Pages vii-viii of the DEIS.**

25 Table 2-2, Alternative B: New domestic sheep or goat allotments would not be authorized unless separation from bighorn sheep can be demonstrated, or research demonstrates the risk of pathogen **transfer** can be avoided or is no longer an issue…

31 … (particulate matter less than 10 microns in diameter [PM10] and particulate matter less than 2.5 microns in diameter [PM2.5]). **In the definition of acronyms on Page viii, the term "micrometers" is used rather than "microns" in defining particulate matter**.

32 The State of Wyoming does not have predefined smoke management airsheds (Forest Service 2017b). **This text seems contrary to the text in Footnote #1 on this page**.

32 …a 70-acre portion the Ashley National Forest north of Vernal is at the ~~northwest~~ **northeast** extreme of this nonattainment area boundary. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest**.

36 The Ashley National Forest is in conformance with each of the NAAQS, except for 70 acres that fall within the ~~northwest~~ **northeast** boundary of the Uintah Basin marginal ozone nonattainment area. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.**

38 Emissions in the 70-acre portion of the Ashley National Forest that lies in the ~~northwest~~ **northeast** boundary of the Uintah Basin marginal ozone nonattainment area would be similar to those that currently occur. **Given the location north of Vernal and those portions of the**

nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.

39 Under all alternatives, vegetation and fuels treatments would be used, **in varying degrees**, to reduce tree density and the quantity of surface fuels and to remove insect-affected trees, which, in turn, lowers the risk of severe wildfire. **Alternative C would rely more on natural processes than active vegetation management.**

45 Erosion is also a disturbance that often occurs secondarily **because of** changes to the soil surface.

48 Soil quality in these areas can be expected to be maintained or altered depending on the management of recreation and livestock grazing impacts. **Fire and fuels management (or the lack thereof) also has a significant impact on soil quality in special designation areas. Focusing solely on recreation and grazing impacts could be interpreted as being bias against those activities**.

51 Under Alternative B, two **additional** areas covering 10,300 acres would be managed as wilderness with 230 acres identified as potential wetlands.

53 This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height ~~exceeds~~ **exceeding** 4 inches **is rare**.

60 Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory from livestock and wild ungulates, fire suppression, roads, and motorized recreation. **Non-motorized recreation can also affect stream dynamics and hydrology, such as non-motorized trail improvements near streams. Failure to list that stressor could be interpreted as showing bias for non-motorized recreation and against motorized recreation.**

60 At higher elevations in the Uinta Mountains, these include a glacial lake, potholes, kettle ponds, and beaver ponds. **There is only one glacial lake? Page 64 indicates there are many.**

61 Harmful algal blooms have been observed periodically in the upper reaches of Flaming Gorge Reservoir ~~on~~ **in** or near the plan area.

61 The area includes a portion of the Ashley National Forest encompassing the Duchesne-Roosevelt Ranger District and portions of the Vernal Ranger District within the Whiterocks River drainage that is within the original treaty boundary of the Uintah and Ouray Ute Indian Reservation (Indian Country). **Please provide a map of what is considered "Indian Country" by the EPA.**

62 There are 14 pipelines that traverse parts of the Ashley National Forest, three of which are used for electricity generation. **Moon Lake Electric is decommissioning the electricity generation facilities in the Yellowstone Canyon and Uinta Canyon areas, so the associated pipelines will be removed. For more information, contact Jared Griffiths, Moon Lake Electric, 435-722-5400**.

63 Several municipalities extend their protection areas onto the Ashley National Forest, including the following municipalities in Utah: City of Green River, Duchesne, Whiterocks, Tridell, Vernal, Manila, and Dutch John. **City of Green River, Utah, or Wyoming?**

63 The Ashley National Forest also possesses three subbasin claims, with plans to file for additional claims. The Ashley National Forest holds three subbasin claims; … **Note repetition.**

64 Most vegetation is dominated by herbaceous species, especially **in** the ~~in~~ northern areas of the FGNRA, with high acreage of irrigation-influenced riparian and wetland areas.

66 Conifers are encroaching across elevations on the Uinta Mountains, with 500 acres observed during vegetation mapping (Forest Service GIS 2020). Conifer encroachment is common for the mid- to low elevations and is likely attributed to fire suppression. **500 acres observed versus "common at mid to low elevations" seems inconsistent. Is the 500 acres just at high elevations?**

70 Allotment level assessments conducted over the past decade have identified specific locations where past livestock **grazing** may be a factor that has contributed to water quality impacts (see for example, Goodrich and Huber 2015).

72 These protective plan components would reduce impacts on water quality from surface disturbance, recreation, and motorized and nonmotorized users **but may prohibit certain restoration projects that could benefit water quality in the long term**.

72 This raises the possibility of increased sedimentation, higher water temperatures, and shifts in flood severity or frequency, essentially destabilizing watersheds, **when compared to Alternatives B and D.**

72 The threat of uncharacteristic wildfire would continue and be the highest of all alternatives, **except for Alternative C, which would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment**.

74 The threat of uncharacteristic wildfires would continue and would be the highest under all alternatives **(except for Alternative C)**; the overall watershed condition would be at risk from uncharacteristic wildfires with the potential to reduce overall WCF scores. **Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire**.

76 Recommended wilderness areas include extra protection for riparian and wetland vegetation, including restrictions on surface disturbance, development, and access that would preserve riparian and wetland vegetation and structure in these areas; however, restrictions on restoration **and fuels management** in recommended wilderness could affect the Forest Service's ability to improve **and protect** these riparian~~s~~, wetlands, and possibly fen communities.

77 Alternative B would include plan components that restrict equipment refueling, maintenance, and storage of fuels and other materials in riparian management zones, locating timber roads and infrastructure outside of riparian management zones, and avoiding riparian management zones when ~~construction~~ **constructing** roads and trails with some exceptions.

78 Alternative B would use mechanical treatments and prescribed fire to treat ERUs and move them toward desired conditions. **ERUs is not in the list of acronyms on pages vii and viii**.

79 Impacts on water quality would be reduced, compared with alternative A, from reductions in surface disturbance, restrictions on motorized travel, and a reduction in the concentration of recreation users. **However, areas with special designations rely more on natural processes rather than active fuels management and restoration projects, which can lead to increased risk of uncharacteristic wildfire and resultant negative impacts on water quality from "flood after fire" events**.

80 Alternative C would reduce disturbance from such activities as recreation and mechanical treatments, compared with alternative A; however, additional constraints on restoration treatments could also affect the effectiveness of restoration. **Alternative C would rely more on natural processes, which could leave riparian vegetation at greater risk for uncharacteristic wildfire**.

82 Improper grazing, such as intensive grazing in riparian, wetland, and fen communities may change the vegetation composition by reducing highly palatable plant species while increasing less palatable plant species, including nonnative and invasive plant species; reduce vegetation cover; diminish plant species richness; and reduce the hydrological function related to the quality and quantity of riparian and green line vegetation. Desired condition plan components common to all action alternatives for riparian areas, livestock grazing, and soil should minimize the potential for adverse impacts related to livestock grazing. **This statement implies that flexible grazing management could lead to improper grazing, which would not be the case if forest service range managers are doing an effective job of managing allotments**.

83 Beyond the Ashley National Forest boundary, past, present, and future actions by other entities, as well as activities associated with rural residential communities, **impact watersheds and aquatic and riparian ecosystems**.

89 Together, these coniferous vegetation types cover about 53 percent of Ashley National Forest lands, with mixed conifer and ~~Engelmann spruce~~ **Lodgepole pine** comprising the largest amounts. **Table 3-14 indicates more acreage of Lodgepole pine than Engelmann spruce.**

93 The most recognized and understood driver of aspen communities is fire. **This sentence occurs twice in the top half of this page (above and below the 3 bullet points).**

93 In persistent aspen stands, ~~Increased~~ **increased** fire frequency would likely reduce the number of older, declining aspen stands and perhaps improve clone vigor and health with more frequent cohort turnover.

93 Due to the limited number of acres of aspen on the Anthro Plateau landtype association, aspen is more susceptible to elk browsing **there** than **in** other aspen-bearing landtype associations.

95 Livestock ~~have grazed~~ **grazing** has occurred in various forms and intensities for more than 100 years.

111 Table 3-18: **Mixed conifer, under Alternative B should be 29,000; not 29,00**.

115 **Prescribed fires** ~~Fires~~ would be mostly low to mixed severity to reduce conifer competition and maintain or improve ponderosa pine composition and structure where burning occurs.

122 Every fire with a resource objective or that escapes initial attack must have a decision in **the** wildfire decision support system.

127 Table 3-27: **Please explain to the reader how a flame length can be less than 0 feet. Perhaps it would be better to use "unburnable" as in Table 3-28?**

131 However, with a greater proportion of managed wildland fire, there would be an increased risk of the unintended outcome/consequence that a fire could escape; this could lead to larger wildfires, habitat and watershed damage, and recreation closures. Depending on the extent of such fires, impacts may persist over the long term. **In addition, Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire. Management direction under Alternative C relies on natural processes, which removes many tools otherwise available to reduce the risk of uncharacteristic wildfire**.

135 The Intermountain Region report indicates between 2005 and 2013, total forest ecosystem carbon in the region increased from 1,069 Tg (teragrams) to 1,084 Tg, (**This information is presented in both paragraphs one and two on this page**).

147-148 Management concerns related to this species include habitat impacts from **wildland fire,** invasive plant species, climate change, oil and gas development, predation, and livestock grazing (Forest Service 2017a). **Wildfire, whether natural or human-caused, should be considered as one of the major impacts on greater sage grouse habitat**.

153-154 **The analysis assumptions need to address predation of these species, which is one of the major stressors**.

160 This is because designated areas would not receive active natural resource management, and the Forest Service would be unable to ~~purse~~ **pursue** activities such as habitat restoration and enhancement.

165 The area of bighorn sheep CHHR that encompasses timbered stands is not typical bighorn sheep habitat (typically open, alpine areas); however, timber harvest within these atypical areas of CHHR may benefit bighorn sheep by facilitating migration through the timber

stands as bighorn sheep move between summer and winter ranges. **The acronym CHHR (Core Herd Home Range) is not listed on Page vii along with other acronyms used in the DEIS.**

167 It should be noted, however, that some of the potential impacts ~~form~~ **from** recreational use may be partially offset by opportunities for long term habitat improvements in destination and general recreation MAs, which would allow for initiation of habitat improvement projects.

171 Included are 9,000 acres of general Rocky Mountain bighorn sheep habitat, 17,500 acres of Rocky Mountain bighorn sheep CHHR, 3,000 acres of greater sage-grouse habitat, 9,100 acres of lynx **peripheral** habitat, …

173 Because fewer acres of Rocky Mountain bighorn sheep, lynx, and fringed myotis habitat would be suitable for timber production relative to Alternative A, these species would experience reduced impacts from tree removal. The benefit to at-risk species, whose habitat is threatened by conifer encroachment (Rocky Mountain bighorn sheep), from fewer acres of habitat suitable for timber production, would be less relative to alternative B. **These two sentences seem to contradict…Rocky Mountain Bighorn Sheep suffer negative impacts from tree removal but positive impacts from removal of encroaching conifers.**

173 All species may benefit from movement of habitat towards desired conditions in areas where vegetation treatments occur, and to a greater extent ~~that~~ **than** Alternative A.

176 Unlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduced habitat features such as forage and cover. **With forage utilization and stubble height determined based on land health standards, this should not translate to reduced habitat features provided that USFS range managers are accurately assessing land/range health.**

176 This is because overall recreation would be higher intensity with more facilities, roads, and other disturbances. (delete the second of two periods)

179 Table 3-44 and associated text: **Is 2020 U.S. Census data available to update this data?**

180 Table 3-45 and associated text: **Is 2020 U.S. Census data available to update this data?**

180 Table 3-46 and associated text: **Updated employment data for counties in Utah should be available from agencies such as the Utah Department of Workforce Services.**

181 Table 3-47 and associated text: **Updated employment data for counties in Utah should be available from agencies such as the Utah Department of Workforce Services.**

182 Table 3-48 and associated text: **Updated average earnings and per capita income data should be available.**

182 Table 3-49 and associated text: **Updated unemployment data is available from the Utah Department of Workforce Services for counties in Utah**.

183 Table 3-50 and associated text: The Ashley National Forest's annual budget (including expenditures and salaries and excluding fire expenditures) was approximately $15.5 million in fiscal year 2017. Approximately 60 percent of the budget was spent on salaries in fiscal year 2017**. Updated expenditure data should be available for federal fiscal year 2021.**

184 Table 3-51 and associated text. **PILT and SRS data for 2020 and 2021 should now be available.**

184 Footnote to Table 3-51: *Portion of total PILT attributable to National Forest System acres. Additional payments to the analysis area are made as a result of other Federal land ~~management~~ **ownership** (for example, the BLM).

184 The SRSCS, reauthorized in March 2018, was enacted in part to address this decline by stabilizing payments to counties dependent on revenues from Federal timber sales. **The SRSCS program has been authorized again after March 2018.**

188 In a 2008 survey of public land uses in Utah (Krannich 2008), 76 percent of respondents from ~~Dagget~~, **Daggett**, Duchesne and Uinta Counties rated development of energy resources as "very important" for the quality of life of people living in their communities.

189 and elsewhere: 2008 Beliefs and Values study (Russell 2008) **The 2008 Krannich study was based on responses from residents in the Daggett, Duchesne and Uintah County area. Where were the respondents from in the Russell study? If those respondents were not from the proximity of the Ashley National Forest, that may explain how the mindset of the Russell respondents differ considerably from that of the Krannich respondents.**

189 Key tribal resources and relevant habitat types are identified in table 3-53, in "Areas of Tribal Importance." **Table 3-53 is entitled "Minority and Low-Income Populations within the Socioeconomic Plan Area (2018)". Areas of Tribal Importance don't seem to be included in this table.**

197 There are numerous commercial fuelwood operations and ~~five~~ **seven** sawmills that process timber in the economic analysis area, as detailed in "Timber." **Page 186 states that there are seven local sawmills rather than five.**

199 Table 3-57. Recreation Experiences Matrix **The following recreation usage should be recognized in the DEIS**:

> **Families use Destination Recreation Areas (see Tables 3-60, 3-61 & 3-62), General Recreation Areas, Trails with Mechanized Access, and Trails with Motorized Access.**
> **Large Groups use Trails with Mechanized Access and Trails with Motorized Access.**
> **Hunters use Remote areas with low use.**
> **Anglers use Destination Recreation Areas, Backcountry Recreation Areas**

and Developed Recreation sites.
Mountain Bikers use Destination Recreation Areas and Backcountry Recreation Areas (see Tables 3-60, 3-61 & 3-62)
OHV users use Developed Recreation sites and Backcountry Recreation Areas where there are existing motorized routes (see Tables 3-60, 3-61 & 3-62).
Cultural and Historic Site visitors use Trails with Mechanized Access and Trails with Motorized Access to reach these sites.
Environmental Justice populations also use Trails with Motorized Access.

202 Overall, oil and natural gas prices have dropped significantly since much higher levels seen earlier this decade. **This statement needs to be updated to reflect the recent rebound in energy prices from the historic lows in 2020 due to travel and gathering restrictions associated with the COVID 19 pandemic**.

203 Under all alternatives, grazing on National Forest Service lands will continue to represent only minor contributions to the ability of the traditional use to continue in the area, particularly for cattle grazing. **This statement seems to conflict with a statement on Page 247, which reads: "Although typical operators depend only partially on public lands to sustain their livestock, forage sources on Federal lands still represent a critical part of grazing operations." Duchesne County believes that the statement on Page 247 is accurate and the statement on Page 203 is not.**

204 The lack of quantitative objectives for vegetation treatments under alternative A, **and the limitations on vegetation treatments under alternative C** however, would limit the ability to achieve forest-wide changes.

207 This would limit any impacts on environmental justice, **elderly and mobility disabled** communities related to their ability to use preferred recreation sites; it also would minimize constraints on time and costs to travel to recreation.

210 Additional recommended wilderness areas could result in site-specific impacts on the access for recreation and the type of recreational uses available, which may disproportionately affect environmental justice, **elderly, and mobility disabled** communities in terms of costs for access.

211 ~~Users~~ **User** groups who prioritize developed recreation sites and motorized use may have decreased satisfaction under this alternative, while those who prioritize solitude, and a backcountry experience may have enhanced experiences.

213 Under alternative C, however, an emphasis on passive vegetation management ~~may~~ **would** be less effective in trending vegetation types toward the natural range of variation and improving carbon storage capabilities and ecosystem resilience to climate change at large scales, compared with alternative B.

213 This would result in an additional potential for site-specific impacts on ability to access recreation areas (in terms of **time and** costs for access).

213 Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with Alternative A **however, to a lesser degree than alternative B, due to the restrictions on active vegetation management**.

213 Under alternative C, reduced mechanical treatments and reliance on natural processes would reduce short-term impacts from treatment **but provide reduced long-term benefits on ecosystems when compared to alternative B**.

213 Exposure pathways—Impacts under alternative C would be similar to those described under alternative B. Due to a reliance on natural processes, short-term impacts from use of prescribed fire would be reduced compared with other action alternatives; however, emissions would occur from use of managed wildland fires. **Under alternative C, the risk of uncharacteristic wildfire and associated health impacts from emissions would be greater than under alternative B due to the restrictions on active vegetation management in alternative C.**

215 Under alternative D, increased mechanical treatments and **less** reliance on natural processes would increase short-term impacts from treatment.

215 This would limit impacts on access for environmental justice, **elderly, and mobility disabled** communities.

230 Table 3-66: **The table should have a footnote indicating that the Ashley National Forest is in the process of decommissioning and disposing of the Indian Canyon and Stockmore Ranger Stations, which are national register listed properties**.

234 Surface-disturbing activities are associated with economic uses of the Ashley National Forest **and may lead to the discovery of previously unknown cultural resources**. **However**, ~~Cultural~~ **cultural** resources can be directly affected **during surface disturbance** by the modification, displacement, and loss of artifacts, features, and middens, resulting in the loss of valuable cultural resource information on the site function, date of use, subsistence, past environments, and other research questions.

235 This ~~would~~ **may** lead to the potential overuse in some areas.

236 Vegetation management treatments (such as timber harvest, planned ignitions, thinning, and planting) on 1,500 acres would be targeted annually (1,200 acres annually in the second decade) for resource objectives. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).**

237 Vegetation management treatments (such as timber harvest, planned ignitions, thinning, and planting) on 1,000 acres annually in the first decade and 800 acres annually in the second decade would be targeted for resource objectives. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years)**.

238 While the Forest Service would employ other vegetation treatments, there would be an emphasis on timber harvest and production with 1,600 acres annually in the first decade and 1,300 acres annually in subsequent years. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).**

240 Under the 2012 Planning Rule, identification of lands that are suited and not suited for timber production is required on national forests, based on legal withdraw**al**, site-specific conditions, and the compatibility of lands with the desired conditions and objectives found within the plan components.

241 The lack of natural fire **and the implementation of passive forest management policies** over a century has led to timber stands that are increasingly dense with older trees, and thus more susceptible to insects and disease. Historical fire suppression **and passive forest management** has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife.

242 The combination of fire suppression, **passive forest management** and insect infestation has also resulted in stand conditions that are potentially more susceptible to high-intensity wildfires.

245 When compared with alternative A, alternative ~~B~~ **C** would use modern fire-planning tools to determine high-risk areas, which may offer some protection to timber stands suitable for production and harvest.

249 Factors affecting livestock operations and range management on the Ashley National Forest are largely based on ~~market demand for livestock and~~ rangeland conditions, ~~both of~~ which ~~are~~ **is** based primarily on forage availability. **The market demand for livestock is based on consumer preference rather than forage availability**.

251 Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage **in the short-term, until precipitation or wind removes the dust**.

253 Fire and fuels management would continue to follow direction outlined in the ~~proposed~~ **existing** plan, though it would not use modern prediction and planning tools to determine high-risk areas.

254 Treatments on 1,500 acres of the Ashley National Forest annually (1,200 acres in the second decade) would affect grazing operations through changes in grazing systems; however, these types of management are generally planned around grazing rotations to minimize impacts on grazing operations. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).**

255 These is a small ~~potnteial~~ **potential** for the need for closures of additional acres in pastures where cattle could not be effectively restricted, resulting in additional loss of HMs. These ~~impactes~~ **impacts** would be determined at the site-~~specife~~ **specific** level during ~~implantation~~ **implementation.**

255 Treatments on 1,000 acres of the Ashley National Forest on an average annual basis (800 acres on an average annual basis in the second decade), … **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years).**

256 Treatments on 1,600 acres of the Ashley National Forest annually (1,300 acres in the second decade) would affect grazing operations through changes in grazing systems; … **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).**

263-264 An act of Congress is not a reasonably foreseeable action, so environmental consequences on leasable and locatable minerals are expected to be the same as under alternative A. **Even though it cannot be predicted whether Congress will officially designate additional wilderness areas under alternatives B and C, even if these areas are left for a long period of time as recommended wilderness or wilderness study areas, management will preclude any land use that would impact wilderness characteristics. Thus, the environmental consequences for leasable and locatable minerals will be different than under alternative A.**

268 Many roadways outside the Ashley National Forest boundaries pass through tribal or BLM lands and provide the only means of access to the national forest; roads accessing the Duchesne Ranger District, for instance, are on tribal lands**. It may be good to note here or elsewhere in the plan that roads crossing tribal lands to access the forest (such as the Rock Creek Road, the Moon Lake Road and the Uinta Canyon Highway) are in very poor condition and that the USFS supports efforts to obtain Federal Land Access Program (FLAP) grants or other funding to improve these access routes.**

269 Alternatives are currently being explored for the Old Stockmore Ranger Station, which is located on land not connected to the national forest. **This sentence should be updated as the Ashley National Forest Supervisor recently announced that this facility will be conveyed to the General Accounting Office, which will then convey it to the Ute Indian Tribe (see https://ubmedia.biz/news/41037/ranger-station-land-going-back-to-ute-indian-tribe/.**

271 National direction for Forest Service management actions would continue to affect how infrastructure and facilities are managed across the national forest. Under all alternatives under consideration in this EIS, variable infrastructure and facilities budgets would affect maintenance and further infrastructure development. National direction will also continue to provide forests with guidance in the management of facilities and infrastructure on Forest Service lands. **The first and third sentences above appear to be repetitive**.

273 They would accrue from the provision of more dispersed camping docks, mountain bike-designated use, improvements to dispersed camping sites and access roads, OHV loop ~~tails~~ **trails**, and other recreational facilities.

274 Roughly 11 miles of the route will be in the **South Unit of the Duchesne** - Roosevelt Ranger District.

274 The Round Park Hardened Stream Crossing Project **would provide** hardened ford structures at two stream crossings in the Round Park area.

274 The Ashley National Forest offers a variety of developed and dispersed recreational activities, such as camping and picnicking, hiking, mountain biking, horseback riding, wildlife and scenic viewing, hunting and fishing, ~~enjoying snow sports~~ **OHV riding**, and rock climbing. Wintertime activities are snowshoeing, cross-country skiing, ice fishing, and snowmobiling. **There is no need to mention "enjoying snow sports" in the first sentence when the second sentence lists a variety of wintertime (snow) activities**.

285 Compared with alternative A, alternative B acres vary only slightly, with a slight increase in motorized ROS classes (ROS roaded and ROS semi-~~primtive~~ **primitive** ~~motirozed~~ **motorized**) and a shift of some acres from ~~semiprimtive~~ **semiprimitive** ~~nonmotirzed~~ **nonmotorized** to primitive ROS class. Compared with alternative A, this may provide enhanced opportunities for motorized users as well as those looking for less developed, primitive non-motorized recreation experiences. ~~Altnerative~~ **Alternative** B would also include objectives to increase and improve both motorized and ~~nonmtorized~~ **nonmotorized** routes, improving recreation ~~opprotuntes~~ **opportunities** for these users.

286 Vegetation management under Alternative B would include annual treatment targets that would result in ~~changes to sort~~ **short** and long-term changes to vegetation structure and related recreational settings.

287 It aims to treat 1,000 acres **annually** in the first decade and 800 acres **annually** in the second decade of vegetation management.

288 Alternative D aims to treat 1,600 acres **annually** in the first decade and 1,300 acres annually in the second decade of vegetation management.

291 The two scenic byways on the Ashley National Forest decision area are the Dinosaur Diamond Scenic Byway (11.8 miles in the decision area) and Flaming Gorge-Uintas Scenic Byway (53.6 miles in the decision area) (Forest Service GIS 2020). Also, the Red Cloud Loop Scenic Backway is 36.2 miles in the decision area, and the Sheep Creek Scenic Backway is 11.4 miles in the decision area. **The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at:** https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.

292 Managing for natural-appearing scenery is important to the public. **This blanket statement may not be accurate. There are certain areas of the forest where natural-appearing scenery is important, but other areas, such as in the current Partial Retention or Modification VQO areas, where modifications of scenery would likely be acceptable to the public**.

298 The Forest Service would annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to

the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternatives A **and C**.

299 Within the Ashley National Forest's boundaries, landownership (containing surface and subsurface) includes public lands managed by the Forest Service, private inholdings, and Utah State lands **and subsurface mineral resources owned by ??????.**

299-300 Land status is determined by legal regulations, restrictions, and permissions on how the land is used or managed for use, including planning, zoning, easements, and other legal designations. **County zoning ordinances and zoning maps do not apply to USFS lands, but they do to inholdings**.

300 Under the land adjustment programs, the Forest Service acquires and consolidates key tracts of non-Federal land to conserve valuable natural habitat, reduce the risk of permanent development in sensitive areas, and enhance public recreation opportunities. **The plan should also state that, under the land adjustment programs, the Forest Service may dispose of lands no longer needed to meet Forest Service objectives.**

304 Land Withdrawals and Conveyances. **This section may be a good place to recognize that certain lands in the Ashley National Forest have been withdrawn from Forest Service management due to the presence of Central Utah Water Project (Bureau of Reclamation) facilities.**

304 Central Utah Water Project, Bureau of Reclamation. **It would be helpful to know here the acreage of land withdrawn for this purpose and how this impacts forest management. A map should be provided to show the locations of these CUP-BOR withdrawal areas.**

307 Under alternative C, one new 1,400-acre RNA and 50,200 acres of new wilderness areas would be designated. Additionally, under this alternative, new ROWs would be considered unsuitable within the RNAs, and the recommended wilderness areas would include 48,600 acres of IRAs. This would decrease the amount of access and land available for special-use authorizations, by 113,000 acres, when compared with alternative A. **How was the total of 113,000 acres calculated?**

313 Of the four eligible segments evaluated in the suitability study, none were determined to be suitable for inclusion in the National Wild and Scenic River System in the preliminary suitability determination. **Then why are they being proposed for designation under alternative C?**

314 ...scenic backways on the Ashley National Forest are the Red Cloud Loop Scenic Backway and Sheep Creek Scenic Backway. **The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at:**
https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.

314 Red Cloud Loop Scenic Backway—This backway can be accessed from Highway ~~131~~ **191** in the Vernal area or at its junction with the Flaming Gorge-Uintas National Scenic Byway, located 15 miles north of Vernal.

316 Under all alternatives, there would be no changes to the FGNRA, scenic byway miles, national recreation trails, geologic areas, or wilderness areas. These areas would continue to be managed according to the enabling legislation for which they were designated. **How can this be true when alternatives B and C would establish additional potential wilderness areas that would be managed to protect those wilderness characteristics?**

317 No acres **within the four recommended wilderness areas** would be found suitable for timber harvest to maintain the option for future designation.

The County appreciates the opportunity to provide comments and looks forward to continually working with the Forest Service to ensure the development of the Ashley National Forest land use plan revision has integrity and fulfills the multiple-use and sustained-yield mandate of public lands.

Sincerely,

DUCHESNE COUNTY COMMISSIONERS

Greg Todd

Renee Hansen

Greg Miles

Mike Hyde

Mike Hyde
Community Development Director

UINTAH COUNTY

STATE OF UTAH

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February 6, 2022

Submitted via electronic mail: https://www.fs.usda.gov/main/ashley/landmanagement/planning

Susan Eickhoff
Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, Utah 84078

Subject: **Ashley National Forest Plan Revision Draft EIS**
RDCC Project No. 81423

Dear Supervisor, Eickhoff:

Uintah County has reviewed the Ashley National Forest Plan Revision Draft Environment Impact Statement (DEIS). The County appreciated participating as a Cooperating Agency in the preparation of the Forest Plan Revision and the DEIS. Alternative D seems to be the most consistent with the County's interests and with the County's Resource Management Plan (RMP). The County offers the following general and technical comments for your review and consideration. We hope that our comments will be helpful in this process.

General Comment Regarding Current Forest Management

Future management of the Ashley National Forest is very important to Uintah County and our citizens who use the forest for a wide variety of recreation activities or to generate income for their families. Decades of passive forest management under the current plan has led to unhealthy forest conditions which make it ripe for disease and uncharacteristic catastrophic wildfire.

Cooperation, Coordination and Consistency

When creating Land Use Plans, the USFS is required to coordinate their Plans with State and Local Government plans. Coordination is a separate process from Cooperation and must occur regardless of whether State or Local Governments were designated Cooperating Agencies. Agencies must make efforts to draft Federal Plans that coordinate with State and Local Plans.

The National Forest Management Act requires the USFS to coordinate with local governments but does not specify how the process of coordination is to be accomplished.

Forest Service regulations require:

- Responsible officials coordinate with local governments.
- Responsible officials shall review local plans and policies that are relevant to the federal plan. The review will consider the objectives of local plans, the compatibility and interrelated impacts between local and federal plans, opportunities to address impacts and contribute to joint objectives, and opportunities to resolve or reduce conflicts. This review must be included in the NEPA document.
- The responsible official will not direct or control management of lands outside of the planning boundary.

Consistency between federal, state, local, and tribal plans is the desired outcome for the coordination and cooperation processes required of federal agencies. The importance of coordination and cooperation between state, local, and Federal agencies during planning processes cannot be overstated. Early involvement and equal consideration in environmental reviews, as interdisciplinary team members, stakeholders, and Cooperating Agencies was the County's main objective and motivation for creation of our RMP. The RMP shall be followed unless inconsistent with any federal statute or duly promulgated regulation.

Page 6 of the DEIS states that: "The Forest Service collaborated with cooperating agencies throughout the planning process to consider ways the forest plan could contribute to common objectives, address impacts, resolve or reduce conflicts, and contribute to compatibility between the Forest Service and other agencies' plans."

The County requests that the DEIS be amended to recognize that some of the cooperating agencies have their own RMPs and indicate whether the USFS intends for the forest plan to be consistent with these plans to the greatest degree possible.

Page 323 of the DEIS addresses "Plan Consistency Review." Unfortunately, there is no mention in this section and of the inconsistencies between alternatives B & C and the County's RMP.

The County's RMP can be found at http://co.uintah.ut.us/Res%2008-12-2019%20R1-%20Uintah%20Resource%20Management%20Plan-%20CC%20Approved.pdf Several areas of inconsistency between the proposed forest plan and its alternatives are discussed below.

Special Designations (Wilderness & Wild and Scenic Rivers)

Page 5 of the DEIS states that: "Such temporary classifications do not guarantee formal designation, but they do influence forest plan guidance of how to manage the recommended areas."

The County's position is that there is no "temporary classification" established when a recommendation is made for a wild and scenic river or wilderness designation. Only Congress has the authority to "classify" lands or waters as wilderness or wild and scenic rivers. Instead, the term "recommended designation" (see footnote 1 in Table 2-1) should be used.

The County's RMP, in Section 25, contains the following policies associated with Wilderness:

25.4.4 The county's support for any recommendations made under a statutory requirement to examine the wilderness option during the revision of land and resource management plans or other methods will be withheld until the following are clearly demonstrated:

- The adopted transportation plans of the state and county or counties within the federal land management agency's planning area (National Forest or BLM land) are fully and completely incorporated into the baseline inventory or information from which plan provisions are derived.
- Valid state or local roads and rights-of-way are recognized and not impaired in any way by the recommendations.
- The possibility of future development of mineral resources by underground mining or oil and gas extraction by directional or horizontal drilling or other non-surface disturbing methods are not affected by the recommendations.
- The need for additional administrative or public roads necessary for the full utility of the various multiple uses, including recreation, mineral exploration and development, forest health activities, operation and maintenance of water facilities, and grazing operations on adjacent land, or on subject lands for grandfathered uses, are not impaired by the recommendations.
- Minimization criteria is applied in proposed areas.
- The analysis compares the full benefit of multiple-use management to the recreational, forest health, and economic needs of the state and the county to the benefits of the requirements of wilderness management.

25.4.5 Public lands that were determined to lack wilderness character during previous wilderness review processes cannot be managed as if they were wilderness based on new or revised views of wilderness character.

Considering the County's policies, the wilderness recommendations of alternatives B and C must not be selected. The only alternatives that would be consistent with County polices associated with wilderness are A and D.

Effects of Wilderness Management on Forest Health

Page 71 of the DEIS states that: *"Wilderness management protects riparian and wetland ecosystems through minimizing ground disturbance, eliminating motorized access, and reducing recreation use, all of which reduce impacts on riparian and wetland vegetation and inhibit the spread of nonnative species."*

This may be true in the short term, but the "hands-off" approach to wilderness management increases the long-term risk of uncharacteristic wildfire, which can destroy riparian and wetland ecosystems.

Page 71 of the DEIS also states that: *"Hydrologic processes can be adversely affected by management activities, such as fire suppression, prescribed fire, timber extraction, fuels reduction, noxious weed treatments, road construction, recreation, and livestock grazing."*

It should be recognized here that hydrologic processes can also be adversely affected by the lack of management activities in special designation areas such as wilderness. The inability to conduct restoration projects in wilderness area will hamper efforts to restore watersheds inside wilderness to properly functioning condition.

Page 119 of the DEIS states that: *"Terrestrial vegetation types, primarily alpine and conifer forest, would be subject to wilderness management direction, as described previously."*

The County requests that the document be amended here to recognize that wilderness management direction removes many tools otherwise available to benefit terrestrial vegetation communities.

Page 119 of the DEIS states that: *"Alternative D also allows for minimum impact suppression tactics only in wilderness. Emphasis is to manage fire for protecting developed resources and would have limited focus to maintain or improve terrestrial vegetation types."*

It is important to have flexibility in the forest plan to suppress naturally occurring fires in wilderness before they spread out of wilderness areas and do tremendous damage to ecosystems. The County recommends adding this flexibility to Alternative B.

Effects of Wilderness Management on Recreation

Page 15 of the DEIS states that: "*Mechanized travel (i.e., mountain bikes) is permitted on existing roads and trails."*

E-bikes are growing in popularity as they offer an alternative mode of transportation for those physically unable to pedal a mountain bike over steeper terrain. The DEIS should indicate whether "e-bikes" are considered motorized travel or mechanized travel and if they would be permitted in special designation areas on the Ashley National Forest7.

Page 185 of the DEIS (Table 3-52) indicates that the visitor satisfaction levels in designated wilderness areas, (associated with developed facilities and services) rates at 96.6% satisfaction.

This data seems suspect when there are no developed facilities or services allowed in wilderness areas.

Page 205 of the DEIS states that: "*Access for recreation would also be maintained for all communities. However, the level of access and the recreational experience may be affected by variation in management areas that restrict future motorized access (i.e., recommended wilderness).*"

The County requests that the DEIS be amended here to recognize that wilderness areas restrict access to citizens with mobility disabilities and the elderly; many of which also have low incomes and should be part of the environmental justice considerations.

Page 206 of the DEIS states that: *"As discussed in the recreation section, users looking for solitude may have limited opportunities in the Ashley National Forest due to high demand and limited ROS classes with these opportunities." Page 207 states that: "However, communities valuing solitude and naturalness for cultural uses may have limited options in the long term."*

The County questions these conclusions that there may be limited opportunities/options for solitude considering there are at least 276,175 acres of High Uintas Wilderness on the Ashley National Forest (with even more acreage on the Uinta-Wasatch-Cache NF) and some 637,700 acres of Inventoried Roadless Areas on the Ashley NF that provide ample land area for solitude seekers.

Effects of Wilderness Management on the Timber Industry

Page 211 of the DEIS states that*: "In addition, alternative C has the lowest level of forest product removal of the action alternatives. This is because of an emphasis on natural processes for vegetation management and an increase in the acres managed as recommended wilderness areas and backcountry recreation areas where timber harvest would be restricted. This alternative would result in the lowest availability and removal of forest products and the associated economic effects related to the timber industry. Economic effects of forest product removal under alternative C would support 35 jobs and $1.8 million in labor income in the local economy, annually."*

Page 244 of the DEIS states that: *"Alternative B would introduce two additional areas for recommendation as wilderness, totaling approximately 10,300 acres. These newly recommended wilderness areas would prohibit timber production to maintain the option for future designation as wilderness, thus reducing the acres suitable for production when compared with alternative A."*

Page 245 of the DEIS states that: *"Alternative C would include the most acres managed to maintain wilderness characteristics; no acres would be found suitable for timber harvest within these areas to preserve the suitability of these areas for wilderness designation. Alternative C would also introduce additional miles of suitable [streams] for inclusion in the NWSRS. This would reduce the available acres for timber harvest."*

The reduction of lands suitable for timber production in favor of additional wilderness acreage under alternatives B and C would be inconsistent with adopted County RMP policies, as follows:

RMP, page 25:

10.4.1 Use active and adaptive forest management to improve forest health and support multiple use and sustained yield with emphasis on employment, forest product production, open space, wildlife habitat, forage, recreation, and other social and economic benefits.

10.4.2 Manage forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by society, including ecosystem and community health and resilience.

10.4.3 Encourage and support the expansion of the local forest product market at sustainable harvest levels.

RMP, pages 26-27

Forest Management Policies

10.4.15 USFS forest plans should address commercial tree species selection, stocking levels, age class distribution, integrated pest management, and fuel loading. Additionally, areas for timber and non-timber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.

10.4.18 Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.

10.4.24 Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.

RMP, pages 27 and 31

Inventoried Roadless Area Policies

10.4.33 Uintah County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially with in the county and their suggested future management classifications.

10.4.34 Uintah County supports efforts by the State of Utah to petition the Department of Agriculture and Congress to establish new management provisions for Inventoried Roadless Areas across the state.

12.4.19 Uintah County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially with in the county and their suggested future management classifications.

Effects of Backcountry Management areas on Recreation

Page 71 of the DEIS states that: *"In general, watersheds with more than 1 mile of road per square mile can be considered to have moderate to high road density (Forest Service 2011c)."*

The County disagrees with this general consideration regarding road density. If a road were 20 feet wide, a mile of road would occupy 105,600 square feet or 2.42 acres of a 640-acre square mile. This is only .00378 percent of a square mile occupied by roads; which is hardly a moderate to high road density.

Page 211 of the DEIS states that... *"Recreation experience—As under alternative B, alternative C would include the establishment of recreation management areas. Under alternative C, however, recreation emphasis would focus on expanded backcountry management areas and further restrict motorized use in these areas. This alternative also has the most acres set aside as proposed wilderness, and it includes additional stream segments managed as suitable for inclusion in the NWSRS."*

This reduction of motorized recreation opportunities under alternative C in favor of additional wilderness and backcountry management areas would be inconsistent with adopted state and local resource management plan policies associated with motorized recreation as follows:

RMP, pages 49-50

19.4.14 State and federal land management agencies shall achieve and maintain traditional access to outdoor recreational opportunities available on federal lands as follows:

- Hunting, trapping, fishing, hiking, camping, rock hounding, OHV travel, biking, geological exploring, pioneering, recreational vehicle camping, and sightseeing are activities that are important to the traditions, customs, and character of the county and should be allowed to continue.
- Wildlife hunting, trapping, and fishing should continue at levels determined by the Utah Wildlife Board and the Utah Division of Wildlife Resources. Traditional levels of group camping, group day use, and other traditional forms of outdoor recreation, both motorized and non-motorized, should be allowed to continue.
- The broad spectrum of outdoor recreational activities available on the subject lands should be available to citizens for whom a primitive, non-motorized, outdoor experience is not preferred, affordable, or physically achievable.

19.4.16 Existing levels of motorized public access to traditional outdoor recreational designations in the county must be continued, including both snow machine and OHV use.

19.4.17 OHV loops should be provided to connect communities with the region. Open area riding as well as looped and stacked trail systems should be offered, with a variety of levels of trail difficulty.

Effects of Backcountry Management areas on Timber Industry

Page 245 of the DEIS states that: *"Under alternative C, there would be an emphasis on management of recreation areas to improve the backcountry experience for recreationists, unlike under alternative A. This management would increase the acreage of backcountry management areas and would prohibit timber harvest within them. This would result in the decreased number of acres suitable for timber production and harvest."*

Reduction of lands suitable for timber harvest in favor of backcountry management areas would be inconsistent with our adopted RMP policies, (see policies previously listed under "Effects of Wilderness Management on the Timber Industry)."

Effects of Alternatives B and C and special designations on Grazing

Page 18 of the DEIS states that: *"Under alternative B, forage for livestock grazing would have specific utilization levels included in management (50 percent) as well as 4-inch stubble height guidelines to provide criteria to help meet desired conditions for terrestrial vegetation."*

Establishing one-size-fits-all utilization levels and stubble height guidelines is inconsistent with the County RMP. If exceptions or on-site modifications are allowed under Alternative B, please indicate here. A more flexible, adaptive management approach, such as

proposed in Alternative D, accounting for range conditions at site-specific locations, should be used to meet desired conditions.

Pages 210-211 of the DEIS state that: *"An alternative assumption (that all affected pastures would be closed and not proportionally reduced) would result in a larger reduction of HMs—a loss of 3,318 HMs—and a small, but measurable, impact on the regional economy. Whether the entire pastures would be closed would depend on whether the management areas could be managed to restrict cattle (for example, with fencing, natural barriers, or herding). The closure of these allotments would result in an estimated loss of 7 jobs and $120,000 in labor income on an average annual basis. This would result in the lowest estimated HMs of all alternatives and the lowest level of economic effects, in terms of jobs and income related to livestock grazing."*

Pages 251-252 of the DEIS state that: *"The most likely impact from management of recommended or designated wilderness would be alterations to the timing and intensity of grazing operations to meet desired conditions to maintain wilderness character. Other potential impacts on grazing management due to recommended or designated wilderness include impacts to access of allotments for maintenance of structural range developments, the ability to haul salt and minerals, and the retrieval of sick animals due to restrictions on motorized use."*

Page 253 of the DEIS states that: *"Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches unless monitoring indicates a different level sufficient to meet and maintain desired conditions (table 3-68). In areas where these guidelines are not met and exceptions are not made, there could be modifications to the timing and intensity of grazing operations, particularly adjustments to livestock numbers or season of use, or both, and associated reductions in numbers and season of use permitted to grazing operators, when compared with alternative A."*

Page 254 of the DEIS states that: *"Under alternative C, forage for livestock would be limited to a level of 40 percent utilization and a stubble height of 4 inches (table 3-71). Exceptions will not be made for utilization levels and stubble-height guidelines."*

The one-size-fits-all utilization and stubble height standards and restricting the timing and intensity of grazing in favor of increased areas managed to maintain wilderness characteristics under Alternatives B and C (see previous four references above) is inconsistent with our adopted RMP policies listed below. The flexibility in Alternative D is preferable.

RMP, page 38-39

15.4.1 Maintain cattle and sheep grazing on BLM and U.S. Forest Service lands at historic levels and historic seasons of use.

15.4.3 Manage lands to maintain or increase forage allocation for livestock grazing. Require annual checking and verification that lands are still up to standard.

15.4.4 Public land agencies should not decrease livestock grazing permits and grazing allocations below present levels considering the impacts of fire and drought.

15.4.15 Land management plans, programs, and initiatives should provide the amount of domestic livestock forage, expressed in AUMs, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of AUMs sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.

15.4.16 The county favors the best management practices that are jointly sponsored by cattlemen's, sportsmen's, and wildlife management groups such as chaining, logging, seeding, burning, and other direct soil and vegetation prescriptions that are demonstrated to restore forest and rangeland health, increase forage, and improve watersheds in grazing districts and allotments for the mutual benefit of domestic livestock and wildlife. When the practices described above increase a grazing allotment's forage beyond the total permitted forage use that was allocated to that allotment in the last federal land use plan or allotment management plan still in existence as of January 1, 2005, a reasonable and fair portion of the increase in forage beyond the previously allocated total permitted use should be allocated to livestock as recommended by a joint, evenly balanced committee of livestock and wildlife representatives that is appointed and constituted by the governor for that purpose. The county favors quickly and effectively adjusting wildlife population goals and population census numbers in response to variations in the amount of available forage caused by drought or other climatic adjustments, and state agencies responsible for managing wildlife population goals and population census numbers will give due regard to both the needs of the livestock industry and the need to prevent the decline of species to a point where listing under the terms of the Endangered Species Act is possible, when making such adjustments.

Effects of Alternatives B and C Scenery Requirements on Utilities and Infrastructure

Page 273 of the DEIS states that: *"The prohibition of new communication sites, roads, utility corridors, and other infrastructure in recommended wilderness areas would be the same as described under alternative B; however, recommended wilderness would occur over a greater area of the national forest. This would constitute 50,200 acres under alternative C, compared with 10,300 under alternative B. Any maintenance to dams, bridges, and administrative and drinking water facilities would require methods designed to ensure preservation of wilderness values. This would result in increased maintenance costs associated with compliance."*

Another reason that Alternative C is not acceptable to the County is the increased costs of maintaining water infrastructure in wilderness areas or wilderness study areas. For example, recent stabilization of a high mountain lake in the High Uintas Wilderness cost

some $600,000 more than it normally would have due to the requirement to airlift equipment to the job site by helicopter.

Page 296 of the DEIS states that: *"Under alternative C, SIO acres would be assigned to the forest, as shown in table 3-84 (see figure 2-10). Alternative C would increase the number of acres in areas where the management emphasis would maintain or enhance the valued scenic character. This is because 74 percent of the lands would have high or very high SIOs, compared with 51 percent under alternative A."*

This high percentage of high or very high SIO's under Alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with our RMP policies set forth in this letter, including the provision of utilities and infrastructure, such as communication towers and transmission lines needed to serve a growing population and a growing renewable energy power grid.

Page 297 of the DEIS states that: *"Every 5 years, the Forest Service would consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternative A."*

If the need for an easement arose, a proponent should not have to wait for the beginning of the next 5-year review period before such easement could be considered. The annual review in alternative D is preferable for flexibility in responding to easement requests.

Page 299 of the DEIS states that: *"Therefore, when combined with the impacts described above from reasonably foreseeable future actions, alternative C would have the fewest cumulative impacts on the scenic character."*

While Alternative C would preserve scenic character to the greatest degree, this high percentage of high or very high SIO's under Alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with our RMP policies contained in this letter.

Page 304 of the DEIS states that: *"Recent increased activity in large transmission projects, such as the Zephyr, Energy Gateway South, and Transwest Express projects, demonstrates that along with increased interest in communication uses and technologies, the demand for enhanced energy infrastructure and electrical connectivity is on the rise and is expected to increase."*

The high percentage of high or very high SIO's under Alternative C would likely impact the ability of the Ashley National Forest to accommodate these increasing demands for energy transmission infrastructure to the detriment of clean energy development and reliability of the power supply in the western grid.

Technical Comments

The remainder of our comments focus on sections of the DEIS where corrections are needed, or additional statements should be added to the analysis or conclusions. Text shown in **bold, <u>underlined type</u>** indicates text that should be added to the DEIS. Text in **bold type** indicates County suggestions for improvement of the DEIS or reasons for the edits suggested. Text that is overstruck should be removed from the DEIS. The County believes that these edits will better inform the decision maker of the implications of the various alternatives and lead to a better result. The County also agrees with all the edits to the DEIS that have been submitted by the State of Utah. The County's comments are as follows and are listed by DEIS page number:

Page

18 Specifically for bighorn sheep, management has been included to limit authorization of new permitted domestic sheep or goat allotments unless separation from domestic sheep and goats can be demonstrated, or research **and consultation with state wildlife management agencies** indicates that the potential for pathogen transfer would be limited.

19 Increased restrictions on resources uses, such as timber, would support ecosystem services associated with clean water~~, including municipal water supplies~~**. Restricting timber harvest may enhance water quality but would likely reduce the quantity of water produced by a watershed, which would negatively impact municipal water supplies.**

32 ...a 70-acre portion the Ashley National Forest north of Vernal is at the ~~northwest~~ **northeast** extreme of this nonattainment area boundary. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest**.

36 The Ashley National Forest is in conformance with each of the NAAQS, except for 70 acres that fall within the ~~northwest~~ **northeast** boundary of the Uintah Basin marginal ozone nonattainment area. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.**

38 Emissions in the 70-acre portion of the Ashley National Forest that lies in the ~~northwest~~ **northeast** boundary of the Uintah Basin marginal ozone nonattainment area would be similar to those that currently occur. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest**.

39 Under all alternatives, vegetation and fuels treatments would be used, **<u>in varying degrees</u>**, to reduce tree density and the quantity of surface fuels and to remove insect-affected trees, which, in turn, lowers the risk of severe wildfire. **Alternative C would rely more on natural processes than active vegetation management.**

48 Soil quality in these areas can be expected to be maintained or altered depending on the management of recreation and livestock grazing impacts. **Fire and fuels management (or the lack thereof) also has a significant impact on soil quality in special designation areas. Focusing solely on recreation and grazing impacts could be interpreted as being bias against those activities**.

53 This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height ~~exceeds~~ **exceeding** 4 inches **is rare**.

60 Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory from livestock and wild ungulates, fire suppression, roads, and motorized recreation. **Non-motorized recreation can also affect stream dynamics and hydrology, such as non-motorized trail improvements near streams. Failure to list that stressor could be interpreted as showing bias for non-motorized recreation and against motorized recreation.**

61 The area includes a portion of the Ashley National Forest encompassing the Duchesne-Roosevelt Ranger District and portions of the Vernal Ranger District within the Whiterocks River drainage that is within the original treaty boundary of the Uintah and Ouray Ute Indian Reservation (Indian Country). **Please provide a map of what is considered "Indian Country" by the EPA.**

72 These protective plan components would reduce impacts on water quality from surface disturbance, recreation, and motorized and nonmotorized users **but may prohibit certain restoration projects that could benefit water quality in the long term**.

72 This raises the possibility of increased sedimentation, higher water temperatures, and shifts in flood severity or frequency, essentially destabilizing watersheds, **when compared to Alternatives B and D**.

72 The threat of uncharacteristic wildfire would continue and be the highest of all alternatives, **except for Alternative C, which would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment**.

74 The threat of uncharacteristic wildfires would continue and would be the highest under all alternatives **(except for Alternative C)**; the overall watershed condition would be at risk from uncharacteristic wildfires with the potential to reduce overall WCF scores. **Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire**.

76 Recommended wilderness areas include extra protection for riparian and wetland vegetation, including restrictions on surface disturbance, development, and access that would

preserve riparian and wetland vegetation and structure in these areas; however, restrictions on restoration **and fuels management** in recommended wilderness could affect the Forest Service's ability to improve **and protect** these riparians, wetlands, and possibly fen communities.

79 Impacts on water quality would be reduced, compared with alternative A, from reductions in surface disturbance, restrictions on motorized travel, and a reduction in the concentration of recreation users. **However, areas with special designations rely more on natural processes rather than active fuels management and restoration projects, which can lead to increased risk of uncharacteristic wildfire and resultant negative impacts on water quality from "flood after fire" events**.

80 Alternative C would reduce disturbance from such activities as recreation and mechanical treatments, compared with alternative A; however, additional constraints on restoration treatments could also affect the effectiveness of restoration. **Alternative C would rely more on natural processes, which could leave riparian vegetation at greater risk for uncharacteristic wildfire**.

82 Improper grazing, such as intensive grazing in riparian, wetland, and fen communities may change the vegetation composition by reducing highly palatable plant species while increasing less palatable plant species, including nonnative and invasive plant species; reduce vegetation cover; diminish plant species richness; and reduce the hydrological function related to the quality and quantity of riparian and green line vegetation. Desired condition plan components common to all action alternatives for riparian areas, livestock grazing, and soil should minimize the potential for adverse impacts related to livestock grazing. **This statement implies that flexible grazing management could lead to improper grazing, which would not be the case if forest service range managers are doing an effective job of managing allotments**.

83 Beyond the Ashley National Forest boundary, past, present, and future actions by other entities, as well as activities associated with rural residential communities, **impact watersheds and aquatic and riparian ecosystems**.

89 Together, these coniferous vegetation types cover about 53 percent of Ashley National Forest lands, with mixed conifer and ~~Engelmann spruce~~ **Lodgepole pine** comprising the largest amounts. **Table 3-14 indicates more acreage of Lodgepole pine than Engelmann spruce.**

127 Table 3-27: **Please explain to the reader how a flame length can be less than 0 feet. Perhaps it would be better to use "unburnable" as in Table 3-28?**

131 However, with a greater proportion of managed wildland fire, there would be an increased risk of the unintended outcome/consequence that a fire could escape; this could lead to larger wildfires, habitat and watershed damage, and recreation closures. Depending on the extent of such fires, impacts may persist over the long term. **In addition, Alternative C would have the highest acreage of special designations where active vegetation and**

fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire. Management direction under Alternative C relies on natural processes, which removes many tools otherwise available to reduce the risk of uncharacteristic wildfire.

147-148 Management concerns related to this species include habitat impacts from invasive plant species, climate change, oil and gas development, predation, and livestock grazing (Forest Service 2017a). **Wildfire, whether natural or human-caused, should be considered as one of the major impacts on greater sage grouse habitat**.

153-154 **The analysis assumptions need to address predation of these species, which is one of the major stressors**.

176 Unlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduced habitat features such as forage and cover. **With forage utilization and stubble height determined based on land health standards, this should not translate to reduced habitat features provided that USFS range managers are accurately assessing land/range health**.

189 and elsewhere: 2008 Beliefs and Values study (Russell 2008) **The 2008 Krannich study was based on responses from residents in the Daggett, Duchesne and Uintah County area. Where were the respondents from in the Russell study? If those respondents were not from the proximity of the Ashley National Forest, that may explain how the mindset of the Russell respondents differ considerably from that of the Krannich respondents.**

189 Key tribal resources and relevant habitat types are identified in table 3-53, in "Areas of Tribal Importance." **Table 3-53 is entitled "Minority and Low-Income Populations within the Socioeconomic Plan Area (2018)". Areas of Tribal Importance don't seem to be included in this table.**

197 There are numerous commercial fuelwood operations and five sawmills that process timber in the economic analysis area, as detailed in "Timber." **Page 186 states that there are seven local sawmills rather than five.**

199 Table 3-57. Recreation Experiences Matrix **The following recreation usage should be recognized in the DEIS**:

> **Families use Destination Recreation Areas (see Tables 3-60, 3-61 & 3-62), General Recreation Areas, Trails with Mechanized Access, and Trails with Motorized Access.**
> **Large Groups use Trails with Mechanized Access and Trails with Motorized Access.**
> **Hunters use Remote areas with low use.**

Anglers use Destination Recreation Areas, Backcountry Recreation Areas and Developed Recreation sites.
Mountain Bikers use Destination Recreation Areas and Backcountry Recreation Areas (see Tables 3-60, 3-61 & 3-62)
OHV users use Developed Recreation sites and Backcountry Recreation Areas where there are existing motorized routes (see Tables 3-60, 3-61 & 3-62).
Cultural and Historic Site visitors use Trails with Mechanized Access and Trails with Motorized Access to reach these sites.
Environmental Justice populations also use Trails with Motorized Access.

202 Overall, oil and natural gas prices have dropped significantly since much higher levels seen earlier this decade. **This statement needs to be updated to reflect the recent rebound in energy prices from the historic lows in 2020 due to travel and gathering restrictions associated with the COVID 19 pandemic**.

203 Under all alternatives, grazing on National Forest Service lands will continue to represent only minor contributions to the ability of the traditional use to continue in the area, particularly for cattle grazing. **This statement seems to conflict with a statement on Page 247, which reads: "Although typical operators depend only partially on public lands to sustain their livestock, forage sources on Federal lands still represent a critical part of grazing operations." The County feels that the statement on Page 247 is accurate and the statement on Page 203 is not.**

204 The lack of quantitative objectives for vegetation treatments under alternative A, **and the limitations on vegetation treatments under alternative C** however, would limit the ability to achieve forest-wide changes.

207 This would limit any impacts on environmental justice, **elderly and mobility disabled** communities related to their ability to use preferred recreation sites; it also would minimize constraints on time and costs to travel to recreation.

210 Additional recommended wilderness areas could result in site-specific impacts on the access for recreation and the type of recreational uses available, which may disproportionately affect environmental justice, **elderly, and mobility disabled** communities in terms of costs for access.

213 Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with Alternative A **however, to a lesser degree than alternative B, due to the restrictions on active vegetation management**.

213 Under alternative C, reduced mechanical treatments and reliance on natural processes would reduce short-term impacts from treatment **but provide reduced long-term benefits on ecosystems when compared to alternative B**.

213 Exposure pathways—Impacts under alternative C would be similar to those described under alternative B. Due to a reliance on natural processes, short-term impacts from use of prescribed fire would be reduced compared with other action alternatives; however, emissions would occur from use of managed wildland fires. **Under alternative C, the risk of uncharacteristic wildfire and associated health impacts from emissions would be greater than under alternative B due to the restrictions on active vegetation management in alternative C.**

215 This would limit impacts on access for environmental justice, **elderly, and mobility disabled** communities.

234 Surface-disturbing activities are associated with economic uses of the Ashley National Forest **and may lead to the discovery of previously unknown cultural resources. However**, ~~Cultural~~ **cultural** resources can be directly affected **during surface disturbance** by the modification, displacement, and loss of artifacts, features, and middens, resulting in the loss of valuable cultural resource information on the site function, date of use, subsistence, past environments, and other research questions.

241 The lack of natural fire **and the implementation of passive forest management policies** over a century has led to timber stands that are increasingly dense with older trees, and thus more susceptible to insects and disease. Historical fire suppression **and passive forest management** has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife.

242 The combination of fire suppression, **passive forest management** and insect infestation has also resulted in stand conditions that are potentially more susceptible to high-intensity wildfires.

249 Factors affecting livestock operations and range management on the Ashley National Forest are largely based on market demand for livestock and rangeland conditions, both of which are based primarily on forage availability. **The market demand for livestock is based on consumer preference rather than forage availability**.

251 Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage **in the short-term, until precipitation or winds remove the dust**.

254 Treatments on 1,500 acres of the Ashley National Forest annually (1,200 acres in the second decade) would affect grazing operations through changes in grazing systems; however, these types of management are generally planned around grazing rotations to minimize impacts on grazing operations. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).**

255 Treatments on 1,000 acres of the Ashley National Forest on an average annual basis (800 acres on an average annual basis in the second decade), … **This acreage of treatments**

is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years).

256 Treatments on 1,600 acres of the Ashley National Forest annually (1,300 acres in the second decade) would affect grazing operations through changes in grazing systems; … **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).**

263-264 An act of Congress is not a reasonably foreseeable action, so environmental consequences on leasable and locatable minerals are expected to be the same as under alternative A. **Even though it cannot be predicted whether Congress will officially designate additional wilderness areas under alternatives B and C, even if these areas are left for a long period of time as recommended wilderness or wilderness study areas, management will preclude any land use that would impact wilderness characteristics. Thus, the environmental consequences for leasable and locatable minerals will be different than under alternative A.**

292 Managing for natural-appearing scenery is important to the public. **This blanket statement may not be accurate. There are certain areas of the forest where natural-appearing scenery is important, but other areas, such as in the current Partial Retention or Modification VQO areas, where modifications of scenery would likely be acceptable to the public**.

298 The Forest Service would annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternatives A **and C**.

299 Within the Ashley National Forest's boundaries, landownership (containing surface and subsurface) includes public lands managed by the Forest Service, private inholdings, and Utah State lands **and subsurface mineral resources owned by ??????.**

299-300 Land status is determined by legal regulations, restrictions, and permissions on how the land is used or managed for use, including planning, zoning, easements, and other legal designations. **County zoning ordinances and zoning maps do not apply to USFS lands, but they do to inholdings**.

300 Under the land adjustment programs, the Forest Service acquires and consolidates key tracts of non-Federal land to conserve valuable natural habitat, reduce the risk of permanent development in sensitive areas, and enhance public recreation opportunities. **The plan should also state that, under the land adjustment programs, the Forest Service may dispose of lands no longer needed to meet Forest Service objectives.**

313 Of the four eligible segments evaluated in the suitability study, none were determined to be suitable for inclusion in the National Wild and Scenic River System in the preliminary

suitability determination. **Then why are they being proposed for designation under alternative C?**

316 Under all alternatives, there would be no changes to the FGNRA, scenic byway miles, national recreation trails, geologic areas, or wilderness areas. These areas would continue to be managed according to the enabling legislation for which they were designated. **How can this be true when alternatives B and C would establish additional potential wilderness areas that would be managed to protect those wilderness characteristics?**

Comments from Uintah County USU Extension Office

Forest-wide grazing guidelines are inflexible

Alternative B and C include adopting Forest-wide guidelines to limit grazing to 50% (Alternative B or D) or 40% utilization (Alternative C) and 4 inch stubble height. While Forest-wide guidelines might be easier to implement, adopting them reduces the flexibility of managers to adapt grazing plans to real resource concerns.

Bighorn Sheep

Bighorn sheep were removed from Utah's SGCN (list of species with greatest conservation need) in 2021. The justification given by Utah DWR was the reassessment of socio-economic factors resulted in this species no longer meeting SGCN inclusion criteria. The new Forest Plan should not include more restrictive policies towards domestic sheep and goats than the previous plan. Grazing by domestic sheep and goats instead of only cattle would be healthy for the range. See Walker, J. 1994. "Multispecies Grazing: The Ecological Advantage." Sheep Research Journal Special Issue 52-64.

Understatement of the impact to the Beef Cattle Industry of grazing on the Ashley Forest

On page 203, the document states that Ashley Forest supports 5 percent of the cattle in the area based on the portion of Head-Months(HM) divided by the total number of cattle and calves in the 2017 inventory for four counties in the area. Using the cattle inventory for the counties of Daggett, Duchesne and Uintah Counties more accurately addresses the importance of grazing on the Ashley Forest to the local beef industry, which is the relevant sector of the cattle industry to the plan. Head-months in the case of cattle is the number of wean-animal months and includes a cow and her unweaned calf. But the numbers used in the estimate of support includes unweaned calves. A high portion of the beef animals grazing on the forest are cow-calf pairs. Therefore, a more accurate estimate of the impact to the Beef industry would use the number of weaned beef cattle as the denominator. That number isn't given in the 2017 inventory but can be estimated by taking the number of all cattle and calves and subtracting milk cows and 85% of the number of beef cows (an estimate of the number of unweaned beef calves). Using these figures, the Ashley Forest allotments support about 12 percent of the beef cattle in Daggett, Duchesne and Uintah Counties.

Conclusion

Uintah County is grateful for the opportunity to make comments on this forest plan revision. Based on our analysis of the DEIS Alternative D best represents policies found in our RMP. We are hopeful that our comments will be helpful in the DEIS process and as a decision is made and a new forest plan is adopted. Please reach out if you have any questions or if you would like more clarification.

Respectfully,

Brad Horrocks, Commissioner

William Stringer, Commissioner

Bart Haslem, Commissioner

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Ute Indian Tribe of the Uintah and Ouray Reservation

Comments on Ashley National Forest – Draft Environmental Impact Statement for the Revised Land Management Plan

February 15, 2022

The Ute Indian Tribe of the Uintah and Ouray Reservation ("Tribe") would like to take this opportunity to submit the Tribe's comments on the Draft Environmental Impact Statement ("DEIS") for the Ashley National Forest Revised Land Management Plan. Separate comments addressing specific issues in the DEIS have been concurrently submitted, but as the traditional owner and caretaker of significant portions of the Ashley National Forest, the Tribe is uniquely centered on ensuring that the management of the Ashley National Forest is conducted in a manner that honors the Ashley National Forest's history and the Tribe's jurisdiction and sovereignty.

The Tribe appreciates the work that has been done to date within the DEIS towards recognition of the Tribe's interests in the Ashley National Forest, but there is significant work still to be performed towards the creation of a management system over the Tribe's lands within the Ashley National Forest that truly demonstrates the level of significance the Tribe holds over these lands.

The Tribe's position regarding the DEIS, and the Ashley National Forest in its totality, is that the most appropriate and effective management of the Ashley National Forest lands is management conducted exclusively by and through the Ute Indian Tribe. The Tribe is an independent sovereign government that possesses the necessary knowledge, resources, and capability to effectively manage the Ashley National Forest lands. The traditional practices of the Tribe effectuate Tribal land management in a way that maintains sustainable ecological balance. The Tribe oversaw the Ashley National Forest lands for centuries in a manner which promoted growth and stability, and the Tribe's exclusive management of the Ashley National Forest lands would continue this partnership between the Tribe and its resources.

Even if exclusive Tribal management of the Ashley National Forest lands is not granted under the current administration, the Tribe's role in the management of these lands must exceed that of any

other interested entity, party, or agency. The management of areas which include tribal lands and resources is best performed through a partnership between the federal government and Indian tribes. This type of partnership would be best expressed in a joint-management system for the Ashley National Forest lands which includes the methodology and practice of free, prior informed consent with the Tribe.

History

The Tribe's ancestral lands, cultural resources and sacred sites extend into much of modern-day Utah and include the Ashley National Forest lands. The Ashley National Forest as it exists in modern history was created from part of the Uintah Forest Reserve which overlaps the Tribe's Uintah and Ouray Reservation ("Reservation"). The Uintah Forest Reserve was originally established on February 22, 1897, from the Uinta and Wasatch Mountains and bordered the Tribe's Uintah Valley Reservation to the north. Only later, in 1905, was the Forest Reserve expanded into the Tribe's Reservation and later became the Ashley National Forest.

Importantly, by the Act of March 3, 1905, 33 Stat. 1069, which extended the time for the opening of the Uintah Valley Reservation to Sept. 1, 1906, Congress authorized the President to reserve an addition to the Uintah Forest Reserve (now the U.S. Forest Service's Ashley National Forest) of such portion of the Indian land as he thought necessary, and to reserve any reservoir sites— "or other lands necessary to conserve and protect the water supply for the Indians or for general agriculture developments, and may confirm such rights to water thereon as have already secured."

On July 14, 1905, by Presidential proclamation, 1,010,000 acres of Indian land was set aside as an addition to the Uintah Forest Reserve: "[T]he United States . . . set apart" Reservation lands "at the head-waters of the streams . . . as forest reserve lands" so that "the water supply" for the "Indians would be maintained[,]" and, then, the President opened the unreserved and unallotted lands to entry on August 28, 1905, which amounted to about 1,004,285 acres.

The addition to the Ashley National Forest of these one million acres of Indian Country lands was solely for the purpose of ensuring water storage for the reserved water rights of the Tribe. Two 1923 Court Decrees adjudicating water rights for the Tribe included discussion of this need for water storage and the purpose of the forest reserve. *United States v. Cedarview Irrigation Company et al.*, No. 4427 (D. Utah 1923), and *United States v. Dry Gulch Irrigation Company et al.*, No. 4418 (D. Utah 1923). The United States recognized that insufficient natural flow exists in the Uinta-Whiterocks and Lake Fork-Yellowstone River Basins to properly irrigate Indian allotted lands. In its Bill of Complaint, the United States attested to the court that

> [t]he water supply of said Uintah River, except when said river is at stages of high flow, is and at all times has been insufficient to supply the needs of the United States and said Indians for the irrigation of the irrigated lands . . . with the consequence that the waters of said river, unless conserved by storage, will become progressively less able to supply the needs of the United States and of said Indians . . . (emphasis added).

Management of the Ashley National Forest lands must first recognize and respect the historical and continuing purpose and significance of these lands to the Ute Indian Tribe.

Jurisdiction

All lands of the Ashley National Forest within the exterior boundary of the Tribe's Reservation are Indian Country, and the Tribe retains jurisdiction over these lands. In a series of cases known as *Ute v. Utah*, the U.S. Supreme Court and the Tenth Circuit Court of Appeals repeatedly held that the Ashley National Forest is within the Tribe's Reservation and under the Tribe's jurisdiction.

In *Ute III*, the Tenth Circuit addressed "the status of the 1,010,000 acres of the Uintah Forest Reserve, which was set aside under the authority of the 1905 Act." *Ute Indian Tribe v. State of Utah et.al.*, 733 F.2d 1087, 1089-90 (10th Cir. 1985) ("*Ute III*"). Examining the 1905 Act and its legislative history, the Tenth Circuit explained that there was nothing that established:

> 'a total surrender of tribal interests' or a 'widely-held contemporaneous understanding that the affected reservation would shrink.' The act merely authorized President Theodore Roosevelt to set apart reservation lands as a forest reserve. This he did. Indeed the 1905 Act specifically reserved the Utes' timber interests in the lands by authorizing forest officials to sell as much timber as could be safely sold for fifteen years and to pay the money to the Utes.

In fact, the Tenth Circuit found that "[t]here is clear evidence that Congress did not intend to extinguish the forest lands of the Uintah Reservation," and therefore held that the "Uintah Reservation was not diminished by the withdrawal of the national forest lands."

The Tenth Circuit's decision in *Ute V* did not disturb this holding. *Ute V* only modified *Ute III*'s holding that the entire Uintah Valley Reservation remained Indian Country to provide that "lands that passed from trust to fee status pursuant to non-Indian settlement under the 1902-1905 allotment legislation" were no longer Indian Country. Because the Forest Reserve Lands (as that term is used in the *Ute v. Utah* cases) were not opened to non-Indian settlement under the 1902-1905 allotment legislation, all Forest Reserve Lands remain Indian Country under *Ute III* and *Ute V*.

Law Enforcement

The Tribe remains concerned that cross-deputized forest service officers may enforce state laws and ordinances on forest service lands that are within the boundaries of the Reservation. The Tribe is aware that the United States Department of Agriculture ("USDA") has a Memorandum of Understanding with the Uintah County Sheriff's Office ("MOU"), which confers local law enforcement jurisdiction to qualifying forest service officers. The Tribe is uncertain whether the USDA has a similar cross-deputization agreement in place with the State of Utah. The Tribe objects to any agreement for law enforcement services that allows cross-deputized officers onto the Indian Country lands of the Ashley National Forest.

According to the terms of the MOU, qualifying forest service officers have the authority to issue citations, make arrests, and perform other enforcement actions pursuant to local county or state laws. Although the MOU does not contain any provisions that explicitly address tribal authority or interests, the Tribe takes notice of a provision that states that the MOU does not alter, limit, or expand the agencies' statutory and regulatory authority. The Tribe interprets this provision as implicitly stating that tribal regulatory authority remains intact and unaltered relative to federal and state authority.

The Tribe requests that the DEIS and any associated documents contain explicit language that acknowledges any current and future memorandum of understanding agreements between the USDA and state agencies do not alter, limit, or expand state authority relative to tribal authority, and that cross-deputized officers will not exercise their powers within the Indian Country lands of the Ashley National Forest. This includes the ability of forest service officers to perform law enforcement actions pursuant to state or local laws within the exterior boundaries of the Reservation against tribal members.

Conclusion

The Ute Indian Tribe is the traditional, rightful manager of the Ashley National Forest and maintains jurisdiction over all lands of the Ashley National Forest within the exterior boundary of the Tribe's Reservation. Management of these lands is a priority for the Tribe. Tribal interests extend to all activities in the National Forest, and especially all activities within the Indian Country portion of the National Forest. Accordingly, a joint-management system over the Ashley National Forest that fully honors the Tribe's history and jurisdiction is the proper management process for these lands and, as a starting point, the DEIS should reflect that type of management.

ASHLEY NATIONAL FOREST PLAN REVISION DEIS

Cmt #	Page #	Row # or Line # or Table #	Reviewer Name & Dept.	Comment	A/R/M[1]	Remarks / How Resolved *(Reviewers: Leave this column blank)*
1.	4	35-38	Ute Indian Tribe	The Ute Indian Tribe relies on revenue from oil and gas leasing to provide essential government services to its membership. The Forest Service and National Forest representatives must consult with the Tribe before making suitability determinations regarding oil and gas exploration and development.		
2.	2	11		The Ute Indian Tribe does not allow the use of ATVs on its Reservation. The National Forest and Forest Service should work with the Tribe to enforce this rule on Indian Country lands within the National Forest regardless of the alternative selected.		
3.	96	19		See Comment #2.		
4.	289	21-25		See Comment #2.		
5.	11	8-12		Wildfires in the area within a mile of Reservation or Indian Country lands must be suppressed immediately, and this should be included in all alternatives.		
6.	20	29-34		The Ute Indian Tribe does not support maximizing timber harvesting. The National Forest was created with the intention to protect the Tribe's watershed and water supply. Protection of the watershed must be prioritized under any alternative.		
7.	21	36		The Ute Indian Tribe's Reservation is the "Uintah and Ouray Reservation," not the "Uintah and Ouray Ute Indian Reservation."		
8.	61	36-39		See Comment #7.		
9.	2	4		See Comment #7.		
10.	21	33-39		Federal courts have determined that the parts of the Ashley National Forest that overlap with the Tribe's Reservation remain Indian Country and were not diminished. The USFS can and should rely on the determinations of the 10th Circuit Court of Appeals when determining these boundaries. The National Forest and Forest Service must consider the Tribe's laws and regulations for the parts of the Ashley National Forest within the Tribe's Reservation boundary and work with the Ute Indian Tribe in management of these areas.		
11.	38	25-26		The Ashley National Forest should work to minimize emissions in and near the 70-acre portion of the National Forest that lies in the northwest boundary of the marginal ozone attainment area under all alternatives. Pollutants do not recognize boundaries, and ozone precursor emissions from vehicles and equipment from the National Forest can settle in the Uinta Basin, worsening air quality issues.		

Comments on Draft EIS

Cmt #	Page #	Row # or Line # or Table #	Reviewer Name & Dept.	Comment	A/R/M[1]	Remarks / How Resolved *(Reviewers: Leave this column blank)*
12.	55	34-40		One of the purposes for the creation of the Ashley National Forest was to protect the watershed of the Tribe. The watershed section of the DEIS must address the Tribe's water rights, and the need for the management plan to directly address the priority of the protection of the Tribe's water supply and water storage.		
13.	83	25		See Comment #12.		
14.	61	31-32		State water quality standards do not apply to water bodies within the Reservation boundary because those areas remain Indian Country, not subject to state jurisdiction.		
15.	122	1-4		The National Forest and USFS must work to immediately suppress wildfires in areas within and adjacent to the Uintah and Ouray Reservation and tribal communities, and a process for this should be included in all alternatives. See Comment #5.		
16.	143	9-41		The National Forest must also consider tribal management plans on flora and fauna including the Greater Sage Grouse Conservation Ordinance, Tribal Management Plan on Hoodless Cactus, Conservation Strategy for the Yellow-Billed Cuckoo, and Conservation Agreement on Cutthroat Trout.		
17.	221	6		The Ute Indian Tribe is the proper name for the Tribe, not the "Ute Tribe."		
18.	221	17		See Comment #16.		
19.	277	4		See Comment #10.		
20.	177	38-42		Environmental Justice requires that the needs of the Ute Indian Tribe be prioritized, and that the National Forest seek free, prior, and informed consent from the Tribe when making decisions that could impact the Tribe or its interests.		
21.	178	1-9		See Comment #20.		
22.	186	1-5		The Ute Indian Tribe relies on mineral and energy development to provide essential government services to its membership. For the Tribe, mineral and energy development is a social and economic sustainability and environmental justice issue. Again, the National Forest was created to protect the Tribe's ability to maintain its homeland through water storage. It is a requirement of environmental justice for this watershed to be maintained.		
23.	217	1-18		The National Forest must consult with the Ute Indian Tribe on any activity in areas of Tribal Importance.		

Comments on Draft EIS

Cmt #	Page #	Row # or Line # or Table #	Reviewer Name & Dept.	Comment	A/R/M[1]	Remarks / How Resolved *(Reviewers: Leave this column blank)*
24.	223	26-29		The Ashley National Forest and USFS should commit, through language in the DEIS, to meet with the Ute Indian Tribe's staff level employees monthly or as needed and meet with the Tribe's elected leadership quarterly or as needed.		
25.	227	10-22		Ashley National Forest should work closely with the Tribe's THPO and Cultural Rights and Protection Department regarding cultural and historic resources.		
26.	304	37-40		The Ute Indian Tribe maintains jurisdiction, in addition to treaty rights, over portions of the Ashley National Forest.		
27.	305	1-2		See Comment #26.		

COALITION OF LOCAL GOVERNMENTS

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COUNTY COMMISSIONS OF SWEETWATER AND UINTA, AND CONSERVATION DISTRICTS FOR LINCOLN, LITTLE SNAKE, SWEETWATER, UINTA, AND SUBLETTE - WYOMING

February 17, 2022

VIA EMAIL: susan.eickhoff@usda.gov, anastasia.allen@usda.gov, lars.christensen@usda.gov

Susan Eickhoff, Forest Supervisor
Anastasia Allen, Forest Plan Revision Team Leader
Lars Christensen, Collaboration Specialist
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Re: Wyoming Coalition of Local Government's Comments on the Ashley National Forest Plan Revision Draft Environmental Impact Statement

Dear Susan, Anastasia, and Lars,

The Wyoming Coalition of Local Governments ("Coalition") submits the following comments on the Ashley National Forest Plan Revision Draft Environmental Impact Statement ("DEIS"). The Coalition members Sweetwater County, Sweetwater County Conservation District, Uinta County, and Uinta County Conservation District are cooperating agencies on this plan revision. Alternative B and the Proposed Plan in Appendix E have not really changed since the notice of intent to initiate scoping on the EIS was published in 2019. The Forest Service insists that it has modified Alternative B to take into account cooperating agencies' input and public comments, but for the most part this has not occurred. Alternative B has not been adjusted to reflect the Forest Assessment Report (2017) and continues to jeopardize municipal water supplies by not reducing the risk of wildfire and promoting healthy forests. Alternative D is more in line with and responsive to the cooperating agencies' comments, including those of the Coalition and its members. The DEIS does not identify a preferred alternative which violates the CEQ rules (40 C.F.R. § 1502.14(d)) and complicates providing comments. The Coalition criticized this approach in 2020 and 2021 during the internal review as a cooperating agency and repeats its criticism here.

The Coalition provides the following general comments and the attached table outlining specific comments on the DEIS (Attach. 1). The Coalition's members made many of these same comments during the administrative draft reviews by the cooperating agencies, but no changes were ever made to address them.

I. Coalition Interests

The Coalition is a voluntary association of local governments organized under the laws of the State of Wyoming to educate, guide, and develop public land policy in the affected counties. Wyo. Stat. §§11-16-103, 11-16-122, 18-5-201. Coalition members include Sweetwater County, Sweetwater County Conservation District, Uinta County, Uinta County Conservation District, Sublette County Conservation District, Lincoln Conservation District, Little Snake River Conservation District, and Star Valley Conservation District. The Coalition serves many purposes for its members, including the protection of vested rights of individuals and industries dependent on utilizing and conserving existing resources and public lands, the promotion and support of habitat improvement, the support and funding of scientific studies addressing federal land use plans and projects, and providing comments on behalf of members for the educational benefit of those proposing federal land use plans and land use projects.

Both the counties and the conservation districts are local governments with special expertise and jurisdiction by law as set out in the CEQ regulations. The counties and conservation district members of the Coalition enjoy the authority to protect the public health and welfare of Wyoming citizens and to promote the management and protection of federal land natural resources. Wyo. Stat. §§ 18-5-102, 11-16-122. Given this statutory charge and wealth of experience in federal land matters, the Coalition members have participated as cooperating agencies on most Wyoming projects and land use plans and have coordinated efforts with Bureau of Land Management, U.S. Forest Service, and other federal, state, and local entities.

Activities on, and management of, the Ashley National Forest directly affect the Coalition's members. Multiple uses such as livestock grazing, guiding and outfitting, and recreation affect the custom and culture of the counties and conservation districts. The Ashley National Forest also plays an important role in the socioeconomic well-being of the counties and conservation districts. The Ashley National Forest also includes watershed that supply the municipal watersheds for Sweetwater and Uinta Counties.

II. RECOMMENDED WILDERNESS DESIGNATIONS

Under Alternative B, there are 10,300 acres of new recommended wilderness. DEIS at 26. Under Alternative C, there are 50,200 acres of new recommended wilderness. *Id.* Across all alternatives, there are already 637,700 acres of Inventoried Roadless Areas ("IRAs") and the High Uinta Wilderness Area containing 276,175 acres. *Id.* at 12. The Coalition opposes the designation of any new recommended wilderness areas, because these designations have caused the current conditions of the Forest due to the "hands-off" management approach for these areas. Including additional acreages within the Forest where timber production and harvesting, mechanized vegetation treatments, and road construction are prohibited will only exacerbate the current problems and lead to catastrophic wildfires.

When wilderness areas burn, there is a loss of forage for wildlife and livestock. It can also burn range improvements, such as fences and water development. Livestock grazing permittees are then faced with the difficulty of replacing all improvements without having the ability to use mechanized vehicles in the wilderness areas to bring in building materials.

Further, the Forest Service lacks authority to evaluate new areas for wilderness designation under the Utah Wilderness Act. The Coalition and its members have commented extensively on the limits of the Forest Service's authority under the Utah Wilderness Act to review additional lands as suitable for wilderness designation. Pub. L. No. 98-428, § 201(b)(2). *See* September 23, 2016 and February 28, 2017, Draft Potential Wilderness Inventory Comments; November 8, 2019 Scoping Comments. The Forest Service's review of lands suitable for wilderness designation is limited to those areas identified in RARE II and those lands described in Section 201(d) of the Utah Wilderness Act. Pub. L. No. 98-428, § 201(b)(2). The lands described in Section 201(d) are national forest system roadless areas that were evaluated in a unit plan or managed pursuant to a multiple use plan and that are less than five thousand acres in size. *Id.* at §201(d). Congress specifically clarified that its release provision in Section 201(b)(2) was addressing the question of when "those lands not designated as wilderness by [the Utah Wilderness Act] but reviewed in the RARE II process can again be considered for recommendation to the Congress for designation as wilderness." S. Rep. No. 98-581, 12 (1984); *see also id.* at 15. This is also supported by the fact that the Utah Wilderness Act expressly prohibits the Department of Agriculture from conducting any further statewide roadless area reviews and evaluations on National Forest System lands in Utah for the purpose of determining their suitability for wilderness designation unless authorized by Congress. Pub. L. No. 98-428, § 201(b)(5); S. Rep. No. 98-581, 16-17 (1984). Since 1984, Congress has not authorized additional or expanded wilderness review or management authority. Therefore, the Forest Service cannot inventory and evaluate new areas to determine their suitability for wilderness designation in this plan revision process and certainly lacks the authority to adopt wilderness-similar management.

III. RECREATION MANAGEMENT AREAS

The Coalition appreciates the inclusion of a description of the three newly proposed recreation management areas in the DEIS. However, the Coalition is still concerned about how the Forest Service identified and set the boundaries for backcountry management areas, general recreation areas, and destination recreation areas. This is especially true considering that the acreages for these management areas change with each alternative and there are only minor differences in description between destination recreation areas and general recreation areas.

As an example, the destination recreation areas for all alternatives include 23,000 acres of livestock grazing allotments with active grazing occurring on 13,000 acres. *See* DEIS at 26, 118-119. If there is a mixture of livestock grazing and recreation use, then this acreage would

arguably be better categorized as "general recreation areas" to protect livestock grazing use. The DEIS defines general recreation areas as those areas where "dispersed and developed recreation, fuelwood gathering, vegetation management, *livestock grazing*, electrical transmission infrastructure, communication sites, and oil and gas production may occur." *Id.* at 15 (emphasis added). There are also presumably other multiple uses occurring within destination recreation areas, but they have not been specifically identified.

The introduction of recreation management areas is also another means by which the Forest Service can restrict the multiple uses that occur on the Forest without statutorily or administratively designating the area as a National Recreation Area, Wilderness, or inventoried roadless area. Under Alternative C, almost all of the destination recreation areas overlap with livestock grazing allotments and the management direction is to prohibit livestock grazing. DEIS at 26, 118-119. The DEIS even states that there may be a need to close additional acres where cattle cannot be effectively restricted, which would result in additional loss of permitted head months. *Id.* at 255. Alternative C is also using backcountry management areas to expand wilderness and roadless areas by prohibiting timber harvest and motorized use. *See id.* at 17 ("backcountry recreation areas focused on dispersed recreation outside wilderness areas with limited infrastructure") and 26. The Coalition objects to the use of recreation management areas as a way to further restrict other multiple uses and expand wilderness.

IV. LANDS AVAILABLE FOR TIMBER PRODUCTION

The Ashley National Forest proposed land management plan falls tremendously short of achieving management of its lands identified as suitable for timber production. Under the existing 1986 Forest Plan, 528,000 acres (38 percent) of the Ashley National Forest were designated as suitable for timber production. DEIS at 239. However, the area that is currently managed for timber production has been significantly reduced in size due to the implementation of the 2001 Roadless Rule. *Id.* The Forest Service fails to recognize that while the 2001 Roadless Rule did prohibit timber harvests in inventoried roadless areas, the prohibition is subject to exceptions. 36 C.F.R. § 294.13(a)-(b); *see* 66 Fed Reg. at 3257 (Jan. 12, 2001) ("… the agency agrees with those respondents who asserted that science-based forest management might require some level of vegetative management in inventoried roadless areas. Thus, the agency has decided to allow some timber harvesting for clearly defined purposes in the final rule ….").

Timber harvest is allowed in roadless areas to remove small diameter timber to improve threatened, endangered, proposed, or sensitive species habitat; or to maintain or restore the characteristics of ecosystem composition and structure (reducing the risk of uncharacteristic wildfires). *Id.* at § 294.13(b)(1). It is also allowed when it is incidental to a management activity not otherwise prohibited, it is needed and appropriate for personal or administrative use, or the roadless characteristics have been substantially altered due to construction of a classified road and subsequent timber harvest. *Id.* at § 294.13(b)(2)-(4). The Forest Service cannot continue to use the 2001 Roadless Rule as a basis for not managing its Forest when that Rule specifically

allows for timber harvesting under the current circumstances. The "roadless areas" in the Ashley National Forest fit at least two exceptions, logging is necessary to restore ecosystem composition and structure and the roadless characteristics were altered due to road construction and previous harvests. The DEIS fails to address these exceptions and the imminent risk of wildfire.

Under the DEIS Alternative B, The number of lands identified as suitable for timber production is only 109,800 acres. *Id.* at 24, 236. The annual target for vegetation management treatments is only 1,500 acres per year the first decade and 1,200 acres per year the second decade. *Id.* at 24, 111. During the planning period of 10 years, the Forest Service will only treat 15,000 acres or 14% of the total lands identified as suitable for timber production. It would take about 90 years to treat just the 109,800 acres of lands identified as suitable for timber production. This leaves about 600,000 acres of forested vegetation (coniferous and seral aspen to coniferous forest) (*id.* at 241) to be treated with wildfires and other vegetation treatments. In the meantime, that 600,000 acres of forested vegetation will continue to die with increased fuel loading and degraded conditions leading to catastrophic fires and watershed failures. This is not management of the resources. It also clearly violates the Healthy Forests Restoration Act, 16 U.S.C. § 6501 *et seq.* and the Forest Service Organic Act, 16 U.S.C. § 475.

V. USING WILDFIRES (NATURAL IGNITIONS) TO MEET RESOURCE OBJECTIVES IS NOT AN APPROPRIATE RESOURCE MANAGEMENT TOOL

The Forest Service must reduce wildfire risks and "enhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape." 16 U.S.C. § 6501; *see also* 16 U.S.C. § 475 ("[n]o national forest shall be established, except to improve and protect the forest within the boundaries, or for the purposed of securing favorable conditions of water flows …"). The DEIS is not responsive to either legal mandates or documented resource conditions. The Ashley National Forest is in dire condition – tree mortality continues unabated, watershed health is steadily deteriorating, and vegetative conditions have and will produce catastrophic fires. The East Fork wildfire burned through wilderness and roadless areas alike. The attached photo clearly depicts the nearby dead timber and the areas burning. Attach. 2. While the Forest Service aggressively defended the fire and structures, using wildfire as management means no aggressive suppression and the loss of recreation structures, trails, and fences. Both the Ashley and adjacent Uinta-Wasatch-Cache National Forests have faced significant wildfires. These conditions are largely the result of the Forest Service's use of "hands off" management citing Wilderness, Inventoried Roadless Areas, and the planning effort that started in 2007.

Under Alternative B, the Forest Service "would use wildland fire and other vegetation treatments to improve or maintain desired vegetation treatments to improve or maintain desired vegetation conditions on 6,600 to 32,000 acres per year during the life of the plan." DEIS at 117. "The emphasis would be to use fire for ecosystem maintenance and restoration." *Id.* Alternative B also states that "[u]se of natural ignitions for resource objectives would be encouraged, where conditions permit, on at least 10 percent of the ignitions over 10 years." DEIS at 17. In other

words, treating on the low-end 6,600 acres per year with wildland fire and other vegetation treatments over the next 10 years will only amount to the management of 5% of 1.3 million acres of the Forest. Even in the unlikely event the Forest Service is able to use wildland fire and other vegetation treatments on 32,000 acres per year over the next 10 years, this is only managing 24% of the entire Forest.

It is unrealistic to use wildfires to manage resources considering the current condition of the Forest. The Forest Service has never used wildfire in the past to manage the vegetation resources, because when they occur, it is the wrong time of year to let them continue to burn – dry, hot, and little moisture. These conditions let the wildfires burn too hot and sets the vegetation resources back ecologically. With today's fuel loads and dryer climate, the results now are going to be even worse. The DEIS even recognizes that "[w]ildfire impacts are increasingly difficult to manage on national forests due to excessive fuel loads, a history of fire exclusion, an increased urban interface, and climate change." *Id.* at 35. About 50 percent of the Ashley National Forest's watersheds are functioning at risk, with watershed vulnerability at moderate to very high for wildfires. *Id.* at 58. Wildfires today are significantly different in the amount of heat, damage to the soil and vegetation, and duration than historical fire regimes. *See id.* (watershed vulnerability "increase[s] the severity and intensity of wildfires").

The DEIS must disclose and discuss the environmentally significant impacts of proposed management by wildfire. Wildfire kills fish and wildlife, destroys habitat, increases the loss of soil and water pollution, and facilitates invasions of noxious and invasive vegetation. Fires also release ozone precursors of VOCs and NOx into the air shed. The soil and air pollution are transported into southern Utah and Wyoming. These are all significant impacts that are barely disclosed, let alone analyzed, in the DEIS.

There will be very little progress toward or meeting desired conditions through the use of wildfires. Without large timber harvest acres, large prescribed fire acres, and large mechanical vegetation treatments, the Forest will not move to a more desirable condition. The Forest Service must utilize and coordinate the use of both timber harvests and vegetation treatments (including prescribed fires) to move the Forest forward to healthier condition. There are also billions of dollars available to the Forest Service from Congress to support prescribed fire and vegetation treatments to help improve the conditions on the Ashley National Forest.

Further, by identifying wildfires as a resource management tool and planning to use natural wildfires to meet resource objectives, the Forest Service is crossing a line on its authority and legal obligations. Wildfires are not charged to the National Forest, but paid for out of Wildfire Suppression Money. This money is used only for wildfire suppression, not for managed fires or fires used for resource management objectives. The Forest Service is usurping Congressional authority by using Wildfire Suppression Money for other uses, such as targeted resource management. Wildfires as a resource management tool also requires site specific NEPA analysis like a prescribed fired. However, it is going to be extremely difficult for the Forest

Service to complete the necessary NEPA analysis once a wildfire starts and it is determined that it is "where conditions permit" to meet resource objectives.

VI. ADAPTIVE MANAGEMENT FOR GRAZING

The Coalition adopts and incorporates by reference the Wyoming Department of Agriculture's comments on grazing management and its proposed alternative language for the bighorn sheep guidelines. The DEIS currently does not provide a reasonable range of alternatives as it relates to bighorn sheep management. *See* 40 C.F.R. § 1502.14(a). Once a sheep or goat grazing allotment is waived without preference, the end result under all alternatives will be closure of the allotment because separation between domestic and bighorn sheep cannot be accomplished. *See* DEIS at 25. The Coalition objects to the permanent retirement of domestic sheep grazing allotments and instead supports the use of best management practices to mitigate the risk of disease transmission between domestic and bighorn sheep. The Forest Service should be deferring to the Utah Bighorn Sheep Statewide Management Plan and the Wyoming Statewide Domestic Sheep/Bighorn Sheep Working Group Plan regarding management of bighorn and domestic sheep interaction.

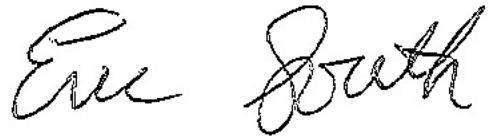
The Coalition also supports adaptive management for livestock grazing that is based on reaching desired conditions without set utilization and stubble height standards. Adaptive management must define the management objectives and invest in the monitoring to ensure they are achieved. Utilization and stubble height are not adaptive management, they are standards that may or may not be achievable. Historically, the Forest Service and the Ashley National Forest in particular has not monitored the allotments every five years. Without a real commitment to monitoring, adaptive management will not work.

Livestock grazing on federal lands is governed by the specific Allotment Management Plans and Annual Operating Instructions, which ensure that livestock grazing is meeting the desired conditions. There is also generally not a one-size-fits all for the management of livestock grazing on federal lands because the soils and vegetation of each allotment are not the same and drought conditions vary year-to-year. The DEIS also does not explain what is not working under the current management or how it needs to change.

VII. CONCLUSION

The Coalition appreciates the opportunity to comment on the Ashley National Forest Plan Revision DEIS and its members look forward to continuing to work with the Forest Service on a plan that will restore the Forest health and protect important watersheds.

Sincerely,



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Eric South, Chairman
Wyoming Coalition of Local Governments

cc: Governor of Wyoming
Governor of Utah
Wyoming Department of Agriculture
Utah Department of Agriculture
Wyoming Game and Fish Department
Utah Division of Wildlife Resources
Wyoming Office of State Lands and Investments
Utah School and Institutional Trust Lands Association
Utah's Public Lands Policy Coordinating Office
Wyoming Stock Growers Association

ATTACHMENT 1

Cmt #	Chapter	Page #	Reviewer Name	Comment
1.	Ch. 1	2-3	Wyoming Coalition of Local Governments ("Coalition")	There is no mention of Forest conditions and health. There is no credible statement of the need for an amendment to address the disease and mortality of the Forest in the planning area. Never has the Forest been so susceptible to catastrophic failure than it is today. Over half of the Forest's watershed are functioning at risk, with the other half showing signs of going the same direction within the 10 to 15-year Draft Plan's timeframe. The Ashley National Forest will not be able to sustain management of the suitable timber base with the projected treatments, and the plans to use wildfire as a management tool is not possible when the Forest is so out of alignment with the natural fire regimes. Wildfire destroys wildlife habitat and kills wildlife. Any reduction in fine fuels cannot compensate for the dead and dying timber that can be ignited from lightning or human-caused fire. Moreover, the Forest Service fire suppression procedures like back burns also have adverse environmental impacts on habitat, soil and watersheds.
2.	Ch. 2	4		The need for change addresses sustainable recreation (DEIS at 3), but then the DEIS states that the Travel Management Plan will not be addressed. There are many places in the Forest where dispersed camping is suitable in areas where the Forest Service promotes dispersed camping, is encouraged and has been administratively allowed outside the 150-foot rule. If the Forest Plan focuses on sustainable recreation, then dispersed camping outside of the 150-foot rule should be addressed. These areas should be identified as designated areas that support recreation outside the 150-foot rule that are beneficial, sustainable and ecologically supported. This issue was a high concern and commented on during other public comment periods.
3.	Ch. 2	12		Under the Elements Common to All Alternatives section, is states "Provide protection for riparian areas." The Coalition suggest changing the language to "Manage riparian areas." The DEIS provides no information on the status of riparian areas, outcome of monitoring, if any, or the standards used. The omission of these critical data points is telling since protecting riparian areas suggests riparian areas are being harmed or are at risk.
4.	Ch. 2	14		The Carter Military Road covers many miles across the Flaming Gorge and Vernal Districts. The limited access to this road has been controversial when trying to implement recreation, range, fuel, and fire projects. If the Forest Service wants to move the Forest to a desired condition, then this Management Area should be reconsidered or at least addressed as to not hamper moving the Forest to a desired condition.
5.	Ch. 2	17		The Forest Service proposes to use an unplanned event – wildfire (natural ignitions) - to meet resource objectives. It is planning on at least 10 percent of those natural ignitions over 10 years will meet the "where conditions permit"

				requirement to meet resource management objectives. The chance the Forest Service will be able to do this is very low. For a brief time, the Forest Service used "right fire, right time" to allow a fire to run when it believed more fire would help vegetation conditions. This policy has proven flawed, however, when fires got out of control and burned out entire communities or destroyed habitat, wildlife and soils. The DEIS needs to disclose and discuss the significant and irreversible commitment of resources when allowing wildfires to be a management tool. Wildfire, especially when hot, destroys biological material in the soils, thus making reclamation very difficult. Wildfire destroys habitat, kills wildlife and leaves soils vulnerable to landslides and invasion of noxious weeds. It also causes harm to water quality by increasing soil runoff and harm to air quality by the release of VOCs and NOx, well-known precursors to ozone. While the public focuses on smoke and particulates the hidden health risks are odorless and invisible. Further, human-caused wildfire have never been called "natural ignitions" and cannot be defined as such. The distinction between human-caused and natural ignitions is unwieldy. In many cases, the agencies cannot determine a cause or there be both causes – lightning in one area but an unattended fire in another that combine into an even larger fire. For the most part, wildfires are human-caused and therefore require full suppression.
6.	Ch. 2	25		The Coalition adopts and incorporates by reference the Wyoming Department of Agriculture's comments on bighorn sheep management. The concern for this management action is that there is not a reasonable range of alternatives. 40 C.F.R. § 1502.14(a). Each alternative involving voluntary waiver without preference will result in the closure of the domestic sheep allotments. The DEIS does not discuss the level of separation required between domestic sheep and bighorn sheep, and whether this would leave any of the acres in the sheep allotment remaining. The domestic sheep grazing season is already limited and would not allow for a shift in the season to reduce conflict between domestic sheep and bighorn sheep. Finally, not all of the sheep grazing allotments can be converted to cattle grazing because of the higher elevation. Ultimately, Alternative B would also result in closure of sheep allotments just like Alternative C.
7.	Ch. 2	27		According to the Wild and Scenic River Act ("WSRA"), in order to be found eligible, a river must be "free flowing" and contain at least one river-related value considered to be "outstandingly remarkable." 16 U.S.C. § 1271; Forest Service Handbook 1909.12, ch. 80, ¶¶ 82.7 – 82.73a (Jan. 30, 2015) The Dowd Creek, Honslinger Creek, Spring Creek, and North Skull Creek are at best intermittent and far from "free flowing". Just about every creek in the Flaming Gorge District has a cultural component, which is fully protected under the Archaeological Resources Protection Act and the National Historic Act. Without meeting WSRA

				criteria of free-flowing waters, these creeks do not meet "outstandingly remarkable". In 2007, with respect to a regional WSRA study, the Coalition urged the Forest Service to incorporate the Utah Code criteria (Utah Code § 63-38d-401). Those comments still apply, because the Forest Service has no authority to designate a wild or scenic river. The Secretary may do so when the state concurs or it is a decision left to Congress.
8.	Ch. 3	35-36		"Wildfire smoke, particularly from large fires, affects air quality on the Ashley National Forest on a seasonal basis. Emissions from wildland fire (wildfire and prescribed fire) can contribute to elevated ambient concentrations of air pollutants, potentially affecting human health and safety." DEIS at 35. "Wildfire emissions, depending on the year, can be a large source of pollution within and around the Ashley National Forest. Management cannot control the emissions except indirectly, through fire suppression and fuels management." DEIS at 36. Why would the Forest Service try and manage any certain percentages of wildfires or natural ignitions if they are a large impact to air quality? Although prescribed fires may have some impact on air quality, they are generally small, are ignited only under a prescription after an EA, and have met Utah and Wyoming State Smoke Management Plans.
9.	Ch. 3	37		"There are several activities on the Ashley National Forest that are sources of air pollutant emissions and have the potential to affect air quality and air quality-related values, such as visibility. Of these activities, prescribed fire and naturally ignited fires managed to meet resource objectives are the forest management actions with the greatest potential to affect air quality." DEIS at 37. This speaks directly to the reason why managing 10% of wildfires or natural ignitions over 10 years is not environmentally sound.
10.	Ch. 3	48		The DEIS needs to discuss the effects when prescribed fires get out of control. High winds typically convert a few thousand or even a few hundred acres into an all-out forest fire. *See e.g.* Trail Mountain Fire in 2018; Kirkwood Prescribed Fire (50 acres grew to over 2000 acres); Caples Fire (to burn slash and debris also exceeded 2000 acres).
11.	Ch. 3	50		The DEIS states "[t]he desired condition for livestock grazing management under Alternative A is to optimize forage to the extent that it is cost effective and balanced with other resources. This desired condition is being met in rangeland areas, except where soil condition are deteriorating." DEIS at 50. However, the Forest Service does not explain if and where soil conditions are deteriorating in rangeland areas. The Forest Service even admits later that "[m]ost rangeland on the Ashley National Forest is in good condition, and vegetation trends appear to be favorable and sustainable." DEIS at 249.

				But yet the Forest Service concludes that specific utilization and stubble height requirements under Alternatives B and C "would better maintain rangeland conditions, including soil condition." DEIS at 52-53. If the Forest Service is going to make this conclusion, then it must explain the current conditions of the rangeland and why the current management is not effective.
12.	Ch. 3	97		"Livestock grazing is a stressor of sagebrush communities. This long-term and enduring practice has affected plant compositions in most communities. Adjustments in grazing management to lower grazing intensity and improve range conditions of sagebrush communities have become more common." DEIS at 97. This is not an accurate statement. The volume of data and research regarding sage grouse and sagebrush habitat do not identify livestock grazing as a stressor. Instead, overgrazing by wild horses, ungulates, or livestock may be a stressor to sagebrush habitat. Drought is most commonly the direct cause of stress on sagebrush communities. Moreover, the DEIS overstates the potential for some livestock grazing to place stress on sagebrush communities when cattle will only eat sagebrush when there is nothing else to eat.
13.	Ch. 3	107		"Effects from Livestock Grazing Management" Section. The Coalition objects to the way the Forest Service is portraying the effects of "livestock grazing management", because it is non-managed or poorly managed livestock grazing that would potentially affect terrestrial vegetation. The Forest Service grazing manual and handbook employs extensive regulatory tools to adopt and implement allotment management plans. Unlike wildlife, livestock grazing is managed by numbers and seasons of use, and these are adjusted each year to reflect current conditions. While it is possible that these impacts may occur, in the interest of accuracy, the DEIS needs to address the regulatory scheme rather than what might occur without federal law, rules or policy.
14.	Ch. 3	108		The DEIS states that "[t]he total for mechanical timber-oriented treatments is approximately (rounded to the nearest 100 acres), 1,500 acres for the first decade and 1,200 acres for the second decade. Combining mechanical treatments with prescribed burning treatments brings the totals to approximately 2,400 acres for the first decade and 2,100 acres for the second decade." DEIS at 108. Based on the discussions elsewhere, this should state 1,500 acres per year, 1,200 acres per year, 2,400 acres per year, and 2,100 acres per year. This also occurs elsewhere in the DEIS and the Forest Service must make sure to correctly state the total amount of timber harvest that is allowed. There is a big difference between 1,500 acres per year for the first decade versus 1,500 acres for the first decade.
15.	Ch. 3	117-118		The DEIS states that under Alternative B, "forage for livestock grazing would have forage utilization guidelines included in management (50 percent) as well as 4-inch **or greater** stubble height guidelines in riparian areas." DEIS at 117-118.

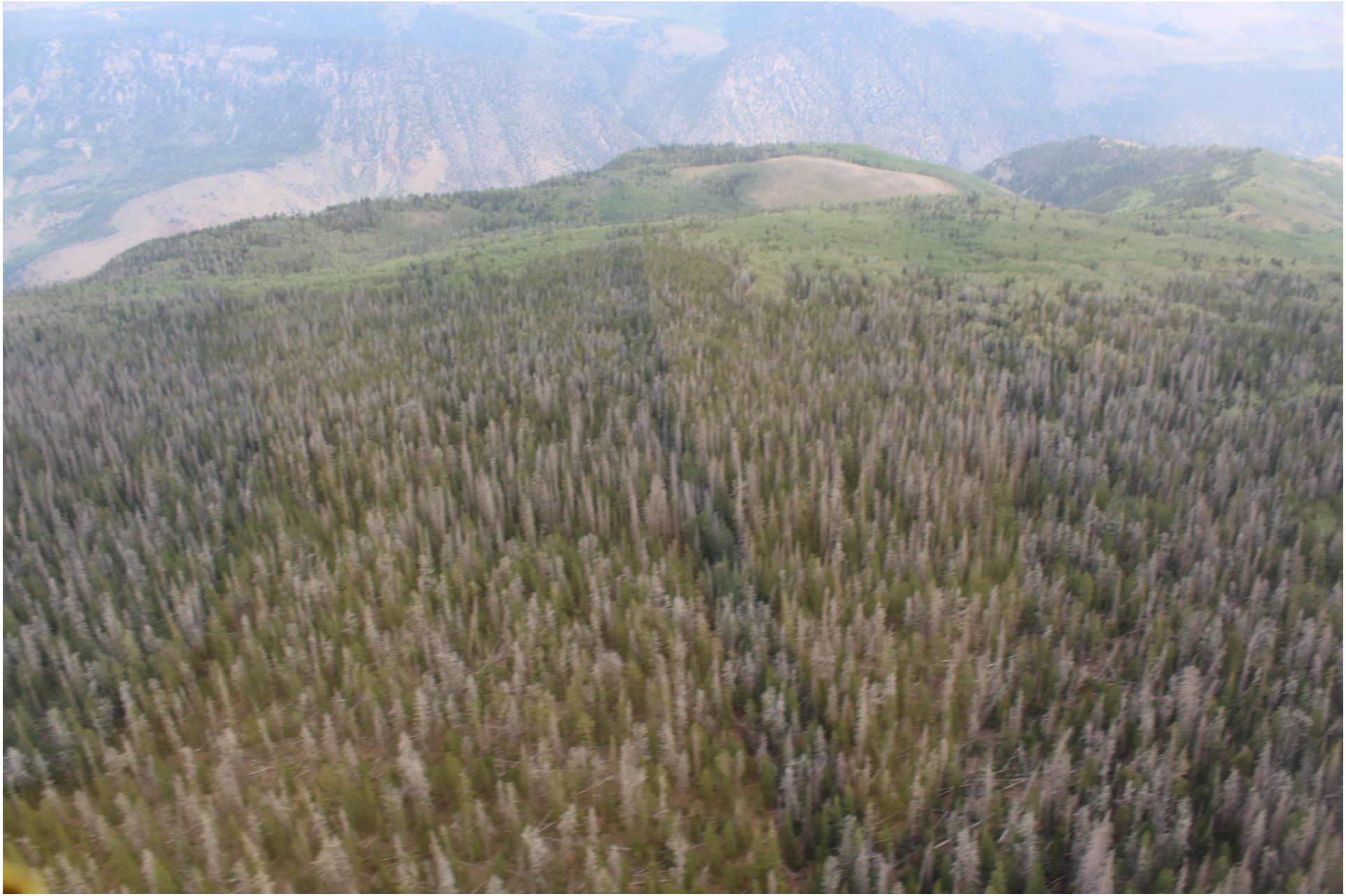
				The Forest Service is not consistent in how it defines this livestock grazing management action throughout the DEIS. The DEIS also states in other parts of the DEIS that it is a "4-inch stubble height" with no qualifications (DEIS at 18) or in other areas it states "4-inch stubble height guidelines with exceptions where a difference height will meet desired conditions" (DEIS at 24). The DEIS needs to be revised to be consistent with the proposed management action for Alternative B. Further, any numerical standard for height needs to be qualified by site capability. NRCS uses ecological sites as the base and, while often inaccurate, this is a recognition that soils, altitude, precipitation, and weather patterns all affect capability. Application of any standard also requires the Forest Service to use monitoring protocols rather than one-time ocular estimates.
16.	Ch. 3	121		"The effects of wildland fire have the potential to drive ecosystem change at a landscape scale (Hessburg et al. 2015). As such, wildland fire is considered a primary disturbance agent that both currently and prehistorically has created this type of change. Across the Ashley National Forest, fire has influenced vegetation patterns, composition, structure, and development of both individual stands and the larger landscape." DEIS at 121. The Ashley National Forest on very rare occasions has had some wildfires that changed the landscape. Most of these fires have occurred on the south slope of the Uintas. This DEIS favors use of wildfires to achieve management objectives, and concludes this management is going to be the answer to a change in landscape and bring the forest to a more desirable condition. Without large timber harvest acres, additional prescribed fire acres, and large mechanical vegetation treatments, the forest will not move to a more desirable condition within this plan term. The past 15 years has been "hands-off" management and this has pushed up the fuel loads and allowed stands of dead and dying trees to increase. The higher risks of wildfire mean loss of biological material in the soils, loss of wildlife and habitat, increased runoff into streams and creeks, threats to municipal watersheds, and increase in invasive species that replace burned vegetation. The northern Ashley National Forest in Utah provides watersheds that feed municipal water supplies for Uinta and Sweetwater Counties. The watersheds also supply water for farms and ranches. The resulting silting of dams and reservoirs from wildfires is both costly to repair and time-consuming. These basins should be managed to protect municipal watersheds. The Forest Service can quantify the wildfire impacts using the East Fork Fire, which combined with the Trail Mountain Fire, burned more than 90,000 acres. The landslides into rivers and creeks have affected streams and water quality. Without extensive rehabilitation, invasive weeds also replace native vegetation.

17.	Ch. 3	124		"In contrast to fire suppression, the forest has infrequently used unplanned ignitions to manage wildfires and reduce fuels. Out of an average 20 to 30 wildfires each year, one to two of them have been managed wildfires." DEIS at 124. This is the typical amount of current fires on the Ashley and the infrequency of the use of wildfire being managed for resource objectives. But yet the Forest Service wants to use wildfires as a resource management tool.
18.	Ch. 3	125		"While large fires have burned a significant number of acres across the Ashley National Forest, they are generally rare, with less than 1 percent burning more than 1,000 acres. Due to the strong influence of the monsoon weather, the fire season is determined by its occurrence or lack of occurrence. Lightning from thunderstorms typically begins in late May and accounts for 68 percent of the fires. Due to vegetation green up, 77 percent of the fires are usually less than a quarter of an acre and are easily suppressed. The potential for larger fires (greater than 100 acres) usually occurs between late-June and mid-July. As the monsoons become more common by mid- to late July, all fires are less than 100 acres." DEIS at 125. This statement and the previous one pretty much sums up all the alternatives that address management of wildfire to meet resource objectives. If you have 30 wildfires each year, three fires would be managed for 3,000 acres if the conditions allowed. The conditions of the Forest will not allow a wildfire to be used as a resource management tool and we will instead see situations like what happened with the East Fork Fire in 2020.
19.	Ch. 3	129		"The analysis is based on the following assumptions: • Acres with fuels treatments have reduced departure because treatments have altered the structure and composition of vegetation or fuel loads; this moves vegetation toward desired conditions." DEIS at 129 This does not move the structure to a more desired condition. Fuel treatment without rehabilitation to kill invasive species only replaces native vegetation with non-native species. A treatment in Lodgepole pine without any thinning creates a less desired condition because of the natural regeneration. The density and fuel loading become extremely high.
20.	Ch. 3	147		The DEIS needs to address the current overlap of bighorn sheep range with domestic sheep grazing allotments. It recognizes that since reintroduction, the bighorn sheep have expanded their range on the Ashley National Forest. However, it must also explain how this expansion has caused conflict between domestic sheep and bighorn sheep.
21.	Ch. 3	160-161		The "Effects from Livestock Grazing Management" on terrestrial and aquatic wildlife and plants sections focuses solely on the effects of overgrazing and

				negative impacts. The DEIS should also discuss the positive effects that proper livestock grazing can have on vegetation and wildlife habitat. The DEIS fails to account for the current regulatory program that prevents overgrazing and environmental harm. These statements might have been true in isolated contexts, but the National Forests started regulating grazing in the early 20th Century. The DEIS needs to discuss what is the case for the Ashley National Forest, not some hypothetical landscape.
22.	Ch. 3	171		"Management of unplanned ignitions on at least 10 percent of ignitions would result in short-term impacts on wildlife and at-risk species, such as temporary habitat loss and the potential for injury or mortality. It also would result in long-term impacts such as improved habitat quantity and quality due to increased flexibility and the ability to reach desired conditions, relative to alternative A. The location of these effects cannot be predicted because the location of future unplanned ignitions is unknown." DEIS at 171. The Forest Service's management of unplanned ignitions resulting in only short-term impacts to wildlife and at-risk species is very optimistic. The use and control of an unplanned event produces some of the worst kind of fire conditions and has the potential to produce serious impacts to wildlife and at-risk species. As noted elsewhere in these comments, other impacts include invasive species replacing native plants, loss of soil, increased runoff and harm to water quality.
23.	Ch. 3	176		For Alternative D, "[u]nlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduce habitat features such as forage and cover." DEIS at 176. Again, this incorrectly assumes that overgrazing is occurring, that land health standards are not being met, or even that the requirements set out in individual allotment management plans are insufficient in protecting the vegetation and wildlife habitat. There is nothing in the DEIS showing that there is currently a problem, and instead the DEIS states that the rangelands are in good condition. DEIS at 249. The DEIS also needs to define land health standards. The Department of the Interior adopted rangeland health principles, but the Forest Service did not.
24.	Ch. 3	227		The IDT Program Lead for the Cultural and Heritage Section of this Forest plan revision has also submitted individual comments on the draft plan during a public comment period. There is a concern about a potential conflict occurring when a IDT team member who is helping to draft a plan and the DEIS is also submitting individual public comments in attempt to sway the decision of the Forest Service.

25.	Ch. 3	241		"Fuelwood harvest accounts for approximately 49 percent of forest products removed on the Ashley National Forest annually; saw timber accounts for 30 percent, and post and poles represent approximately 20 percent. Composition analyses in the decision area indicate that single-tree selection harvest represents approximately 38 percent (50,800 acres) of the total acres suitable for timber production on the forest." DEIS at 241. Therefore, almost half of the 1,500 acres available for timber production under Alternative B would be for individual firewood use and not timber sales.
26.	Ch. 3	255		Alternative C would prohibit livestock grazing on 13,000 acres within destination recreation areas. However, the DEIS notes that there 'is a small potential [sic] for the need for closures of additional acres in pastures where cattle could not be effectively restricted, resulting in additional loss of HMs." DIES at 225. The Coalition objects to the closure of any grazing allotments in destination recreation areas and further objects to an open-ended proposal to close additional acres if needed.
27.	Ch. 3	260		"A new oil and gas leasing analysis will likely be needed for any future oil and gas leasing on the national forest. This is because the existing EIS and decision date back to 1997; they do not consider the 2001 Roadless Rule or the 2015 decision regarding greater sage-grouse and associated habitat." There is not a question of this "likely" being needed, but that it "will have to be completed" in the future if not addressed in the plan revision. The 2012 Planning rule requires that the responsible official consider mineral energy resources in the planning document. 36 C.F.R. 219.10(a)(2). Moreover, NEPA requires that the Forest Service identify all significant issues on the forest as they relate to the management actions being proposed. *Dep't of Transportation v. Public Citizen*, 541 U.S. 752 (2004); *Motor Vehicle Mfrs. Ass'n of the U.S., Inc. v. State Farm Mut. Auto. Ins.*, 463 U.S. 29, 43 (1983) (agency must consider the important aspects of the problem). The Forest Service, therefore, cannot merely kick the can down the road when the Forest Plan must, at a minimum, set out the basic parameters for oil and gas leasing. The 2001 Roadless Rule and the 2015 Greater Sage-Grouse ARMPA do not change this result. Those documents only *increase* the need to perform an analysis of the management situation as it applies to oil and gas leasing. The Forest Service must analyze and disclose reasonably foreseeable mineral potential including studies and analysis by the Department of the Interior. The Forest Service must provide a reasonable estimate of potential development to inform the analysis. The Forest Service must provide a reasonable qualitative approximation in the absence of data and describe lacking data.

28.	Appendix E	14		Objectives (FW-OB-WA) – "Improve the condition class of at least two priority watersheds, as defined by the National Watershed Condition Framework, every 10 years." With at least 50 watersheds functioning at risk (DEIS at 58), the objective of improving at least two priority watersheds ever 10 years is not going to solve the problem. At that rate, more watershed will be moving into the functioning at risk from functioning properly, and those that are already functioning at risk watersheds will be moving into not functioning or impaired function. It will not be enough to improve the condition class of at least two priority watersheds every ten years, as defined by the National Watershed Condition Framework. Further, there are not enough vegetation treatments planned to occur to keep the Ashley National Forest watersheds from falling into impaired function. With watersheds failing, catastrophic consequences will happen for those downstream of Forest Service watersheds. The Forest Service needs to have a land use plan that puts more emphasis on the kinds of projects and infrastructure needed to move watersheds in the right direction.
29.	Appendix E	16-17		It is difficult to determine if the Riparian Management Zone widths are the total distance or distance from each side of the stream, pond, lakes, etc. For example, if the 150 feet slope distance from perennial streams mean 150 feet from both sides, or 75 feet from each side for a total of 150 feet? Riparian areas are not a readily quantified area because it is a matter of soil and vegetation, not numerical feet. The Coalition would also request a reduction in the Riparian Management Zone widths because this is just another restricted area on an already overly special designated Forest.
30.	Appendix E	26		Objective (FW-OB-FVC) – "Complete forested vegetation management treatments, such as timber harvest, planned ignitions, thinning, and planting, every year on 1,648 acres of the Ashley National Forest, measured for every 10 years, to maintain or move toward achieving desired conditions for forested ecosystems. Table 7 and table 8 display the projected annual vegetation management practices." Where does 1,648 acres come from? It does not match any number analyzed in the DEIS. Alternative B calls for 1,500 acres per year and Alternative C calls for 1,600 acres per year. DEIS at 24.
31.	Appendix E	28		Objective (FW-OB-NFV) – "Restore ecological function, integrity, and resilience; move toward upward trend; or maintain desired condition of 2,500 acres (on average) annually of non-forest vegetation during the life of the plan This would apply to non-forest areas threatened by conifer encroachment or invasive plants or that are in degraded condition." What treatments are to be used in accomplishing the objective?

32.	Appendix E	87		"Vegetation composition based on resource values (RVs). Total ground cover within 85 percent of potential. Plant species richness within range of variability. Conifer encroachment limited to 10 percent tree crown cover or less." The Coalition cannot agree with the approach the Forest Service has taken on applying a total ground cover within 85 percent of potential. This percentage comes from a document used for FIA inventory purposes and has been misused by many specialist in Region 4 and on the Ashley National Forest. Ecological sites need to be used to calculate the percentage of potential for total ground cover. These sites need to be refined as well since the NRCS ESDs are on a general scale and soil can vary within a short distance. The Coalition requests the Forest Service to re-word the above to reflect Ecological Site, not a strict 85 percent.

ATTACHMENT 2