

- WALLY J. JOHNSON, CHAIRMAN
- ROY LLOYD, COMMISSIONER
- LAUREN SCHOENFELD, COMMISSIONER
- JEFFREY SMITH, COMMISSIONER
- RANDAL M. WENDLING, COMMISSIONER

80 WEST FLAMING GORGE WAY, SUITE 109
GREEN RIVER, WY 82935
PH: 307-872-3890
FAX: 307-872-3992

Thursday, October 24, 2019

WER 0704.04a
U.S. Forest Service
Ashley National Forest
Revised Land Management Plan
Notice of Intent to Prepare an Environmental Impact Statement
Sweetwater County

Michael Richardson, Acting Forest Supervisor
Ashley National Forest
Attn: Plan Revision
355 North Vernal Avenue
Vernal, UT 84078-1703

Dear Michael:

Sweetwater County would like to thank you for the opportunity to comment on the revision of the Ashley National Forest Land Management Plan (Draft Plan). Our comments are provided below for your consideration

1986 Ashley National Forest Plan Appendix A: The existing forest plan contains a separate Appendix A for defining the management direction for the Flaming Gorge National Recreation Area (FGNRA). The resources and topics covered by this appendix include: climate, air, water, vegetation, wildlife and fish, minerals, recreation, scenic values, timber, forage, interpretation, special land uses, mineral use, economics, community cooperation, fire, transportation, insects and disease, research, land ownership adjustments, public safety and special management areas and units.

The Draft Plan may address some of these resource topics. However, Sweetwater County believes that, since the FGNRA is an important state and regional recreation and economic asset, these resource topics should be fully addressed in a separate plan chapter or appendix dedicated to the Flaming Gorge. Further, Sweetwater County believes that this additional chapter/appendix could be prepared by a team of Ashley planning staff members and Wyoming cooperators working collaboratively together. This collaborative effort would identify and create the necessary desired conditions, objectives, guidelines, etc. to guide the management of the FGNRA for the next 20 years.

Public Law 90-540: On October 1, 1968, Congress passed Public Law 90-540 and created the National Flaming Gorge Recreation Area making it a separate management unit within the Ashley National Forest. For the FGNRA, the public law included the following purposes:

- Provide for public outdoor recreation use and enjoyment of the Flaming Gorge Reservoir and surrounding lands in the States of Utah and Wyoming,
- Conserve the scenic, scientific, historic and other values contributing to the public enjoyment of the lands and waters of the FGNRA.

- WALLY J. JOHNSON, CHAIRMAN
- ROY LLOYD, COMMISSIONER
- LAUREN SCHOENFELD, COMMISSIONER
- JEFFREY SMITH, COMMISSIONER
- RANDAL M. WENDLING, COMMISSIONER

80 WEST FLAMING GORGE WAY, SUITE 109
GREEN RIVER, WY 82935
PH: 307-872-3890
FAX: 307-872-3992

To emphasize the local, state and national importance of the FGNRA, Sweetwater County believes that the draft plan should clearly reference the congressional law and its above purposes.

A suggested place to insert the FGNRA public law reference and its purposes is as the first Desired Condition on page 68, Chapter 3 - Management Direction for the FGNRA.

2012 Planning Rule at 36 CFR 219.7(e): The Planning Rule at 36 CFR 219.7(e) states “The following plan components are required: desired conditions, objectives, standards, guidelines, and suitability of lands. Goals may be included as an optional plan components.” After review, the county has noted that the proposed plan contains a number of resource topics that do not have these required plan components. Prominently missing from a number of resources are measureable objectives that are necessary to determine if the Desired Conditions are being met.

Page two of the proposed plan states, “There is no requirement that every topic have plan components, and not every type of plan component is included for every topic.” This draft plan statement seems to contradict the previously referenced 2012 Planning Rule which requires that each resource contain specific planning components including objectives.

Please explain this contradiction and why the Ashley National Forest believes that each resource doesn't require objectives. The county suggests that a meeting with the cooperators and the forest service staff could assist in developing missing plan components.

Oil and Gas: Within the FGNRA, Sweetwater County supports limiting oil and gas leasing and development to a No Surface Occupancy basis. This position is consistent with existing forest policy that states “Highly restricted recommendations usually contain no surface occupancy stipulations. These areas include steep slopes, the Sheep Creek Geological Area, the Flaming Gorge Nation Recreation Area, research natural areas and recreation and administrative facility sites. Restrictions are year long.” (1986 Ashley Forest Plan EIS, Volume I page IV-35)

To implement or consider a NSO leasing policy for the FGNRA, the proposed plan must evaluate or make a determination about the suitability or availability of land for future oil and gas leasing. To accomplish this, the forest service should adjust its statement on page 4 of the proposed plan, under the title “What the forest Plan Does Not Cover – Authorizations for Oil and Gas Leases”. This section currently states, “This proposed forest plan will not evaluate or make determinations about the suitability or availability of lands for future oil and gas leasing.” If a NSO stipulation is going to be implemented within the FGNRA, this prohibition to evaluating oil and gas lease determinations should either be removed or modified to allow oil and gas lease evaluations within the FGNRA. As a note, the 1997 Western Uinta Basin Oil & Gas Leasing Report did not include the FGNRA.

Right of Way Exclusion Areas: To preserve the naturalness and the scenic resources within the FGNRA, Sweetwater County supports R.O.W. Exclusion (prohibition) for the following developments: commercial scale wind and solar farms, electrical transmission lines (not service lines) and oil and gas transmission pipelines. This county request for R.O.W. exclusion is consistent with the congressionally stated purposes of the Flaming Gorge National Recreation Area (Public Law 90-540-October 1, 1968). This position is also supported by recent Sweetwater County comments submitted to the BLM regarding the Greater Little

- **WALLY J. JOHNSON, CHAIRMAN**
- **ROY LLOYD, COMMISSIONER**
- **LAUREN SCHOENFELD, COMMISSIONER**
- **JEFFREY SMITH, COMMISSIONER**
- **RANDAL M. WENDLING, COMMISSIONER**

80 WEST FLAMING GORGE WAY, SUITE 109
 GREEN RIVER, WY 82935
 PH: 307-872-3890
 FAX: 307-872-3992

Mountain Area and the Region 4 Section 368 West wide Energy Corridors. However, it should be noted, that even though we support certain R.O.W exclusions, the county strongly supports honoring valid and existing rights.

R.O.W. Avoidance Areas: Within the FGNRA, for the purposes of promoting public safety and clear communication, Sweetwater County supports the development of commercial communication sites as R.O.W. avoidance areas. Sweetwater County interprets R.O.W. avoidance areas as those areas in which development is not excluded as long as it is constructed with careful placement and design that preserves the naturalness and scenic beauty of the FGNRA.

Wildlife: Sweetwater County supports the FGNRA comments of the Wyoming Game and Fish Department (WGFD) as they relate to protecting Wyoming Species of Greatest Conservation Need, Greater Sage Grouse Core Areas, and habitat supporting wildlife utilizing the FGNRA from the adjacent to the Greater Little Mountain Area. Additionally, to preserve the outstanding fishing opportunities within the Flaming Gorge, the Green River and their tributaries, Sweetwater County supports strengthening draft plan components related to watershed, aquatic and riparian ecosystems.

Roads: In the draft plan Appendix B, entitled “Flaming Gorge National Recreation Areas”, add to management approach #1 a sentence that states: “All road, trail or two tract road closures will be coordinated with the governing county in which the transportation feature is located.”

Sweetwater County opposes any closure of an existing road within the FGNRA without prior review and approval by the county.

Community Coordination: Draft plan Appendix B, “Working and Coordinating with Partners and Cooperators, Item #1 states: “Work with local governments, businesses, individuals and organizations to assist in permit processes....” Sweetwater County supports this management approach and encourages the forest service to urge project developers to obtain all necessary permits including local building, development and zoning permits.

Recreation: The Flaming Gorge National Recreation Area is an important recreation resource that supports the quality of life and the economy of not only Sweetwater County and Wyoming but also of surrounding states and counties. To help preserve and enhance the recreational opportunities offered by the FGNRA, Sweetwater County offers the following comments:

- **Economics:** Under the Social and Economic Section, on page 36, Sweetwater County suggests adding an Objective #1 that states: “Within one year of the adoption of the plan, complete a socio-economic impact study that analyzes the social and economic importance of the Flaming Gorge Recreation Area to the individual surrounding counties and states.” The purpose of this study would be to establish a baseline for further defining recreational goals and objectives for the FGNRA.
- **FGNRA Management Areas and Units:** Sweetwater County suggests updating and incorporating into the draft plan Recreation and Settings and Opportunities Section (page 54) or the Recreation Area Management Section (page 78) the FGNRA Management Areas and Units

- WALLY J. JOHNSON, CHAIRMAN
- ROY LLOYD, COMMISSIONER
- LAUREN SCHOENFELD, COMMISSIONER
- JEFFREY SMITH, COMMISSIONER
- RANDAL M. WENDLING, COMMISSIONER

80 WEST FLAMING GORGE WAY, SUITE 109
GREEN RIVER, WY 82935
PH: 307-872-3890
FAX: 307-872-3992

and their management direction as found on pages A-24 through A-47 within Appendix A of the 1986 Ashley National Forest Plan.

- **FGNRA Visitor Center:** Sweetwater County believes that it is important to note that the northern boundary of the FGNRA is located within the city limits of Green River, that the city of Green River has two Interstate 80 on and off ramps, and that it is in close proximity to both the Buckboard Marina and the Big Firehole Campground. With these geographical assets, the City of Green River could be promoted as a gateway to the Flaming Gorge National Recreation Area, which could help foster increased tourism and economic diversification within the region. This concept is especially important pending the potential closure of the Rock Springs regional Haliburton office and the projected closures of regional power plant units and coal mine facilities.

Several years ago, the forest service closed its FGNRA ranger station and visitor center and withdrew its presence at the Green River Chamber of Commerce. Sweetwater County believes that it was mistake to close these facilities. For economic development purposes, by attracting Interstate 80 tourism to the FGNRA, the county supports re-establishing a FGNRA visitor center within the City of Green River. To support this concept, Sweetwater County encourages the forest service to include desired conditions and objectives to the Recreation Settings and Opportunities Section (page 54) or the Recreation Area Management Section (page 78) that foster re-establishing the FGNRA Visitor Center in the City of Green River.

Recreation Infrastructure – Trails, Campgrounds, Boat Ramps, etc.: Within the Recreation Settings and Opportunities Section (page 54) or the Recreation Management Area Section (page 78) of the draft plan, Sweetwater County encourages the forest service to establish regional recreation management plans within FGNRA. These plans could be similar to the FGNRA Management Areas and Units contained within the existing Appendix A. Within each of these area plans, resources could be evaluated and plans created for establishing objectives for OHV use, hiking and biking trails, dispersed and organized camping, water and sanitary facilities, boat ramps and other recreation facilities. These recreational plans would balance wildlife and other sensitive resources needs within the area. The need to maintain existing roads and trails for access would be an important aspect of these potential recreation area plans.

- **Flaming Gorge Scenic Byway:** Sweetwater County supports the National Scenic Byway management plan stated in draft plan Appendix B. This management action states: “The National Scenic byways on the Ashley National forest are managed according to their corridor management plans.” Since, within Wyoming, the Flaming Gorge National Scenic Byway crosses multiple ownerships, Sweetwater County encourages the forest service to coordinate its byway and scenic resource management with interested stakeholders such as the BLM, State of Wyoming, Federal Highway Administration and others.

Water – Colorado River Storage Project: In support of the Public Law 90-540 purposes related to supporting the Colorado River storage project, Sweetwater County encourages the Ashley National Forest to meet on an annual basis with the Bureau of Reclamation to discuss contingency plans to address a future call to send Flaming Gorge water to satisfy downstream water demands. Sweetwater County believes that this coordination is important because the call to satisfy water demands caused by drought

BOARD OF COUNTY COMMISSIONERS

SWEETWATER

C·O·U·N·T·Y

- WALLY J. JOHNSON, CHAIRMAN
- ROY LLOYD, COMMISSIONER
- LAUREN SCHOENFELD, COMMISSIONER
- JEFFREY SMITH, COMMISSIONER
- RANDAL M. WENDLING, COMMISSIONER

80 WEST FLAMING GORGE WAY, SUITE 109
GREEN RIVER, WY 82935
PH: 307-872-3890
FAX: 307-872-3992

and growth in lower basin states could potentially drop water elevations to a level that could affect FGNRA boat access, fishing, and other recreational pursuits.

The Wyoming State Engineers Office, in conjunction with the University of Wyoming Extension Office, is currently conducting public meetings to plan for future downstream demands on waters of the upper Green River. Since the Green River is an important asset to the Ashley National Forest, the forest service may consider participating in this water demand planning process.

Again, thank you for the opportunity to provide scoping comments on the Ashley National Forest Draft Plan. If you have any questions regarding our comments, please call me at 307-872-3897.

Sincerely,



Wally J. Johnson, Chairman
Sweetwater County Board of County Commissioners

cc: Joe Budd, Policy Analyst, Wyoming Governor's Office
Sweetwater County Board of County Commissioners
Pete Rust, Mayor, City of Green River
Kent Connelly, President, Coalition of Local Governments
Cody Doig, Attorney, Coalition of Local Governments
Mary Thoman, President, Sweetwater County Conservation District
Greater Little Mountain Coalition