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First name: Eric

Last name: South

Organization: Coalition of Local Governments

Title: Chair

Comments: Re: Coalition of Local Government's Objection to the Ashley National Forest Draft Land Management Plan and Draft Record of Decision

Dear Ms. Farnsworth,

The Wyoming Coalition of Local Governments ([ldquo]Coalition[rdquo]) submits the following objections to Forest Supervisor's, Susan Eickhoff, Ashley National Forest Final Environmental Impact Statement (FEIS), Draft Land Management Plan (LMP), and Draft Record of Decision (ROD). This objection is submitted in compliance with 36 C.F.R. [sect][sect] 219.53, 219.54. The Coalition also requests the opportunity to participate in any objection resolution meetings that address livestock grazing, bighorn sheep, timber, recreation management areas, proposed wilderness designations, and others that are associated with the positions of the Coalition in the following objection. 36 C.F.R. [sect] 219.57(a).

The Coalition members Sweetwater County, Sweetwater County Conservation District, Uinta County, and Uinta County Conservation District have been cooperating agencies throughout this LMP revision process. Since after the Draft EIS was released, the Forest Service has made it a larger priority to meet with cooperators, consider cooperating agencies' comments, and incorporate suggested changes into the FEIS and Draft LMP. The Coalition members appreciate the changes that the Forest Service did incorporate in response to cooperating agencies comments and round table discussions.

The Coalition supports the Forest Service's decision to revise the LMP, but the Coalition has some additional revision it would still like to see before the Forest Service finalizes the LMP and ROD. The Coalition's objections relate to management actions associated with timber harvesting and production; interaction between domestic sheep grazing and bighorn sheep; and the classification of recreation management areas.

#### 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. [sect][sect] 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 County, 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. [sect][sect] 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 plays an important role in the socioeconomic well-being of the counties and conservation districts. The Ashley National Forest also includes watersheds that supply the municipal watersheds for Sweetwater and Uinta Counties, power the Flaming Gorge Dam that provides hydropower generation, and support industrial and agricultural water users.

## II. Objection to Limited Amount of Timber Production and Timber Harvest

The Coalition appreciates the Forest Service's recognition that "[t]imber harvest may be allowed for other resource benefits consistent with the 2001 Roadless Area Conservation Rule. Draft LMP at 78 (DA-SUIT-IRA-01). The Coalition members also appreciate the work that was accomplished with the cooperating agencies in the Fall of 2022 regarding clarifications on timber output, designations, sustainability, etc. This is an important point of overall emphasis because over 50 percent of the Ashley National Forest is designated as inventoried roadless areas. Draft ROD at 17. However, the availability of inventoried roadless areas for timber harvesting should be reflected in the total amount of timber harvest and overall vegetation management treatments planned every year on average for the Ashley National Forest. See Draft LMP at 26 (FW-OB- CONIF-01). As it currently stands, the Draft LMP projected total timber harvest, timber production, and overall vegetation management acres allowed on an annual basis over the next two decades will not bring the Forest back to its desired condition. The Coalition urges the Forest Service to allow for and plan for additional forested vegetative treatments to protect the Forest resources and watersheds, and protect against catastrophic wildfire.

The Coalition comments on the Draft EIS on February 17, 2022, addressed the need to recognize the 2001 Roadless Area Conservation Rule allowed for timber harvesting in inventoried roadless areas, and that additional timber production, timber harvest, and overall vegetation management treatments must be allowed to make any movement in reducing the fuel load on the Ashley National Forest. These same concerns were echoed in previous cooperating agency comments submitted by the Coalition and its cooperating agency members (see e.g. Administrative Draft EIS Comments (March 10, 2021); Alternative B Comments (June 17, 2020); Comments on Proposal to Revise the LMP (Nov. 8, 2019); Cooperating Agency Review of Plan Components Comments (Oct. 26, 2018)), as well as during cooperating agency meetings.

National forests were established to "[i]mprove and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States." 16 U.S.C. [sect] 475. Pursuant to 16 U.S.C. [sect] 1601(e)(1), it is the policy that all forested lands in the National Forest System shall be "[m]aintained in appropriate forest cover with species of trees, degree of stocking, rate of growth, and conditions of stand designed to secure the maximum benefits of multiple use sustained yield management in accordance with land management plans." In addition, the Healthy Forests Restoration Act, 16 U.S.C. [sect] 6501 et seq., calls for the protection, restoration, and enhancement of forest ecosystem components, and to "[e]nhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape." 16 U.S.C. [sect] 6501(3), (6). This is accomplished through the development of hazardous fuel reductions projects on federal land in wildland-urban interface areas, in proximity to municipal water supply systems, and in other areas specified by statute. 16 U.S.C. [sect] 6512(a).

The common theme of the three statutes discussed above is that the National Forest System must be managed in a way, including the use of timber harvest and production, to protect the Forest ecosystem, forest cover, and the watersheds within the Forest. The Coalition members' local land use plans similarly call for the maintenance of vegetation and Forest health to reduce fuelloads and to enhance and preserve water resources. See e.g. Sweetwater County Conservation District Land & Resource Use Plan and Policy 2020-2025, at 40, 44, 46, 53 (Oct. 1, 2020). With only about 109,819 acres on the Ashley National Forest identified as suitable for timber production (Draft ROD at 23), it makes it difficult to not only have a sustainable commercial logging business operating on the Ashley but also does not allow enough harvesting to reduce the fuel load and wildfire risk.

The Forest Service has placed itself in this position due to the over designation of the forest system lands as wilderness and inventoried roadless areas. See Draft ROD at 17 (67% of the Ashley National Forest is designated as either wilderness or inventoried roadless areas). Instead of focusing on additional ways that the Forest can be [ldquo]designated[rdquo] (i.e. recreation management areas), the Forest Service should be utilizing all tools it can to properly manage the resources to protect forest cover and watershed, while reducing the risk of catastrophic wildfires. The Draft LMP currently calls for forested vegetation management treatments (timber harvest, planned ignitions, thinning and planting) on 2,400 acres per year in the first decade (FW-OB-CONIF-01), and the use of wildland fire and other vegetation treatments on about 6,600 to 32,000 acres per year (FW-OB-FIRE-01). Draft LMP at 26, 29. While the Coalition appreciates the larger range of acres in the Fire Objective 01, the problem is that the minimum number of 6,600 acres treated a year through fuels treatment in addition to the 2,400 acres per year of forested vegetation treatments will not be enough to get the over 1.3 million acre Forest back to its desired condition.

The Forest Service will need to increase the forested vegetation treatment acres or the fuels management, or both, to have any reasonable chance of dealing with the increased fuel loads and degraded conditions on the Forest before catastrophic wildfires occur. Although timber production sale quantities are low (average sale quantity of 3,806 CCF measured on a decadal basis (Draft LMP at 44)), there is more availability short term to bring the Forest to the desired condition. This can be accomplished by utilizing the sustained yield limit and harvesting in areas that are unsuitable for timber production but qualify for harvesting due to morality, disease, and insect epidemics. The Forest Service recognizes that about [ldquo]79,600 acres are not suitable for timber production where timber harvest may be allowed under exception[rdquo] within inventoried roadless areas. Id. at 42. These are areas that the Forest Service should start looking at to make treatments to now and is also a basis for increasing the annual timber harvesting allowed currently under the Draft LMP. See id. at 26 (FW-OB-CONIF-01).

Although outside of the scope of this plan revision, the Coalition also encourages the Ashley National Forest to start developing a 10-year strategy of vegetative management for the Forest. Once this is completed, it will demonstrate the need for increased level of vegetative treatments and make the case for additional resources and funding for projects. The Coalition members would be highly interested in participating in and reviewing such a strategy in the coming months before a Final ROD is released to assist the Forest Service in exploring these opportunities within the sustained yield formulas and map designations so that the final LMP and ROD could potentially reflect the resulting observations.

### III. Objection to the Creation of Recreation Management Areas

The Coalition generally objects to the Forest Service[rsquo]s newly created [ldquo]recreation management areas.[rdquo] The Draft ROD describe these as [ldquo][p]lan land allocations[rdquo] that [ldquo]supports the increasing demand for recreation opportunities and contributes to the recreation community.[rdquo] Draft ROD at 10, 15; see also FEIS at 84. While the Forest Service describes these as [ldquo]management areas[rdquo] (Draft ROD at 11), there has never been a discussion about how the boundaries were set by the Forest Service and the extent to which those area may change over time.

In its Draft EIS comments from February 17, 2022, the Coalition asked for additional clarification on how the recreation management areas were defined and the boundaries were set.

It was also concerned that identification of backcountry recreation management areas and management actions in these areas that prohibited grazing or motorized vehicle use would result in the expansion of wilderness and inventoried roadless areas. These issues were also discussed during cooperating agency meetings on the LMP revision.

Pursuant to 16 U.S.C. [sect] 1601(e)(1), it is the policy that all forested lands in the National Forest System shall be maintained [ldquo]to secure the maximum benefits of multiple use sustained yield management in accordance with land management plans.[rdquo] In addition, consistent with the Multiple-Use Sustained Yield Act of 1960,

the Forest Service manages the National Forest System to [ldquo]sustain the multiple use of its renewable resources in perpetuity.[rdquo] 36 C.F.R. [sect] 219.1(b). The multiple uses of the National Forests include outdoor recreation, range, timber, watershed, and wildlife and fish purposes. 16 U.S.C. [sect] 528.

While recreation is one of the multiple uses of the National Forest, the LMP should not be placing one multiple use above all others or at the exclusion of others. See *In re Big Thorne Project*, 857 F.3d 968, 975 (9th Cir. 2017) ([ldquo]The NFMA is about managing competing uses, none to the exclusion of others.[rdquo]). The Coalition agrees that management direction related to recreation opportunities is appropriate, but the Forest Service already has this in place through the use of the [ldquo]recreation opportunity spectrum,[rdquo] which also has specific management actions associated with it. Draft LMP at 59-63. The addition of recreation management areas seems duplicative of the management direction for the recreation opportunity spectrum.

There is also a concern that these [ldquo]management areas[rdquo] will in turn develop to some type of [ldquo]designated[rdquo] areas, such as a National Recreation Area, inventoried roadless area, or wilderness, at some point in the future. While the Coalition supports recreation on the National Forests consistent with multiple uses, it does not support the over designation of the entire Forest at the expense and exclusion of other multiple uses, such as livestock grazing.

#### a) Objection 1: Destination Recreation Management Area Boundaries Should be Redrawn to Exclude Grazing Allotments and Bighorn Sheep Habitat

Throughout the Ashley National Forest LMP revision process, the Coalition has objected to destination recreation areas and the alternative that would have prohibited livestock grazing and resulted in closure of 13,000 acres of grazing allotments. See Coalition Draft EIS Comments (Feb. 17, 2022). In addition, destination recreation areas overlap with bighorn sheep habitat and greater sage-grouse habitat.

In the Draft EIS, one of the alternatives considered exclusion of grazing in destination recreation management areas. See FEIS, Appendix B at 23. While this management area direction was not selected in the Draft LMP, this still raises concerns about the future of grazing allotments that overlap with these areas. One of the desired conditions for destination recreation areas includes providing [ldquo]amenities and sustainable infrastructure to support a variety of recreation activities in close proximity to each other.[rdquo] Draft LMP at 85. What happens when this infrastructure gets developed in or near long-term grazing allotments? There is the potential for increased motorized vehicle collisions with livestock, conflict between permittees and recreationists, and loss of forage due to development. How will conflict between grazing and recreation be resolved on the Ashley National Forest in destination recreation management areas?

The Coalition proposes that destination recreation management area boundaries be redrawn to exclude any grazing allotments. Grazing and recreation can co-exist on the National Forest and has for many years. The Flaming Gorge National Recreation Area is one area where recreation and grazing has co-existed for years. But conflicts are more likely to arise when allotments are intermingled with parking lots, campgrounds, resorts, etc. See *id.* It would be more appropriate to identify those areas with grazing allotments as general recreation management areas, which are defined as an area [ldquo]where the concept of multiple use is most evident.[rdquo] *Id.* [ldquo]It is the working landscape where dispersed and developed recreation, fuelwood gathering, vegetation management, livestock grazing, electrical transmission infrastructure, communication sites, and oil and gas production may occur.[rdquo] *Id.* at 85-86.

Destination recreation management areas also overlap with 9,000 acres of bighorn sheep habitat and 17,500 acres of Core Herd Home Range. FEIS at 183. This directly conflicts with the 2012 Planning Rules, which require [ldquo]the ecological conditions necessary to . . . maintain a viable population of each species of conservation concern within the plan area.[rdquo] 36 C.F.R. [sect] 219.9(b)(1). Currently, bighorn sheep are listed as a species of conservation concern ([ldquo]SCC[rdquo]) on the Ashley National Forest and a key threat to persistence is

[Idquo]habitat loss and degradation from human caused disturbance.[rdquo] FEIS, Appendix D at 19. In addition, human-caused activities can cause [Idquo]fragmenting habitat, reducing forage, and creating surface disturbance that increases the risk of noxious weed establishment.[rdquo] Id. at 20.

While the Forest Service concludes that bighorn sheep are [Idquo]somewhat tolerant of recreation and human disturbances,[rdquo] there is questionable support for the conclusion that they would be tolerant of recreation development that reduces and/or fragments their habitat. Destination recreation management areas include [Idquo]the most intensive recreation development[rdquo] on the Forest and has the highest demand for recreation experiences. Draft LMP at 85. This management direction and desired condition of increased infrastructure is inconsistent with the requirement to ensure adequate conditions exist for bighorn sheep viability.

For the same reasons listed above, destination recreation management areas may not be appropriate where it also overlaps with Greater Sage-Grouse habitat. Intensive development of an area with Greater Sage-Grouse habitat is inconsistent with the Forest Service[rsquo]s guideline requiring management actions to [Idquo]avoid degradation of occupied sage-grouse habitat[rdquo] and to [Idquo]avoid surface disturbance and vegetation treatments in occupied sage-grouse nesting habitat during the nesting season.[rdquo] Draft LMP at 36 (FW-GD-WILDL-11).

The Coalition recommends removing any bighorn sheep habitat, and specifically any of the Core Herd Home Range, as well as potentially Greater Sage-Grouse habitat from inclusion in destination recreation management area boundaries. These areas, similar to areas containing grazing allotments, fit more squarely within the general recreation management areas that recognize multiple uses and do not focus on such intensive development of public facilities.

#### IV. Objections Related to Management Actions to Protect Bighorn Sheep and Their Habitat

There has been a lot of discussion centered on livestock grazing during cooperating agency meetings with the Forest Service between the Draft EIS and the publication of the FEIS. The Coalition members appreciate the Forest Service[rsquo]s receptiveness to considering amendments to management actions that impact livestock grazing. The Coalition specifically appreciates the amendments to guidelines FW-GD-GRAZ-01 and 02, which allow for more site-specific flexibility and reliance on existing allotment management plans for appropriate utilization use levels. See FEIS, Appendix B at 14. The Coalition also appreciates the inclusion of the Utah Bighorn Sheep Statewide Management Plan (2018), the 2019 Memorandum of Understanding (MOU) for the Management of Bighorn Sheep on National Forest System lands in the State of Utah, and the 2022 site-specific MOU, as well as recognizing the importance of collaboration with the State agencies in applying any site-specific management strategy. See FEIS at 161; FEIS, Appendix D at 19-21.

The Coalition commented during the LMP revision process on the management actions associated with bighorn sheep and domestic sheep. See Coalition Draft EIS Comments (Feb. 17, 2022); Comments on Proposal to Revise the LMP (Nov. 8, 2019). The Coalition specifically objected to the closure of domestic sheep grazing allotments that have been waived without preference, and requested that the Forest Service defer to the Utah Bighorn Sheep Statewide Management Plan and the Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group Plan, as well as any specific MOUs. These issues were also discussed during cooperating agency meetings.

The Coalition still has some remaining concerns related to specific guidelines and goals under the Draft LUP and ROD that relate to domestic sheep grazing and bighorn sheep habitat, which are as follows:

##### 1. Objection 1: WILDL Guideline 09 [ndash] Sheep Grazing Allotments Should Not Be Closed or Left Vacant

WILDL Guideline 09 states [Idquo]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 and domestic goats to bighorn sheep consistent with the most current state bighorn sheep management plans, (2) mitigate the threat of pathogen transfer from domestic sheep and 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 domestic 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 and domestic goats to bighorn sheep.[rdquo] LMP at 36.

The Coalition appreciates the amendments that the Forest Service has already included into WILDL Guideline 09, and the incorporation of the State Plans and MOUs. The Coalition, however, still objects to the closure or vacancy of any domestic sheep grazing allotment. If voluntary waivers and vacancies are utilized, then this will adversely affect the domestic sheep industry. Historical experience demonstrates that when allotments are voluntarily waived without preference and listed as vacant, the allotments rarely open to grazing in the future.

#### 1. Objection 2: WILDL Guideline 10 [ndash] Local Information and Best Available Science Not Determinative on Whether Separation Will be Obtained or is Achievable

Under WILDL Guideline 10, it states that [ldquo][n]ew 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.[rdquo] Draft LMP at 36.

Utah Division of Wildlife Resources ([ldquo]UDWR[rdquo]) has authority and responsibility over the protection, management, and conservation of the state[rsquo]s wildlife, including bighorn sheep. Utah Code [sect] 24-14-1(2)(a). The Wyoming Game and Fish Department (WGF) also has the authority [ldquo]to provide an adequate and flexible system for control, propagation, management, protection and regulation of all Wyoming wildlife.[rdquo] Wyo. Stat. [sect] 23-1-103. UDWR can set policies that [ldquo]seek to maintain wildlife on a sustainable basis,[rdquo] and recognize the balance between habitat requirements of wildlife with the social and economic activities of man. Utah Code [sect] 24-14-3(2)(a)-(b). As part of its management, the UDWR has used translocation to reestablish and sustain bighorn sheep populations and has entered into MOUs with livestock permittees and the Forest Service in an effort to reduce disease transmission and other potential conflict between bighorn sheep and domestic sheep. The UDWR last updated its Utah Bighorn Sheep Statewide Management Plan in 2018, and WGF also has adopted a State-wide Bighorn/Domestic Sheep Interaction Working Group Plan (see Wyo. Stat. [sect] 11-19-604).

It is UDWR and WGF that have established the necessary strategies to mitigate any commingling between bighorn and domestic sheep. UDWR has also developed a statewide and site-specific MOUs with the Forest Service to manage bighorn sheep on the Ashley National Forest to help minimize any risk of contact with domestic sheep. See FEIS, Appendix D at 20-21. The domestic sheep operators in this area were actively involved in the development of both MOUs. Therefore, it is unclear why Guideline 10 predicates any new domestic sheep or goat allotments on [ldquo]best available science[rdquo] that shows separation will be obtained or achieved. UDWR, Utah Department of Agriculture and Food (UDAF), and the Forest Service, with the involvement of permittees, have developed those management actions necessary to mitigate any contact between bighorn and domestic sheep.

This phrasing of this Guideline is also confusing, because it is the best available science that would potentially determine the amount of separation that is required or the distance required between grazing allotments and bighorn sheep habitat, and not determine whether this separation is necessarily achievable through appropriate management. Whether separation can and will be obtained will be based on the management of both grazing and bighorn sheep in accordance with State Plans and site-specific MOUs. For example, the UDWR proposes the use of natural and man-made barriers to prevent the commingling of domestic and bighorn sheep. Utah Bighorn Sheep Statewide Management Plan at 14 (2018).

Guideline 10 is also inconsistent with Guideline 09, which recognizes that separation between bighorn sheep and domestic sheep occurs through following site-specific MOUs and the State Plan. Draft LMP at 36. The Coalition requests Guideline 10 be revised to reflect the recognition that separation and mitigation of contact between bighorn sheep and domestic sheep is accomplished through mitigation actions developed in site-specific MOUs involving State agencies, Forest Service, and the livestock permittees.

#### 1. Objection 3: WILDL Goal 03 [ndash] Site-Specific Management Strategies Do Not Belong in Annual Operating Instructions

WILDL Goal 03 calls for minimizing the risk of contact between bighorn sheep and domestic sheep or domestic goats through collaboration with the State of Utah through the use of MOUs and [ldquo]applying site-specific management strategies described in domestic sheep permit annual operating instructions.[rdquo] Draft LMP at 37.

The Coalition agrees with WILDL Goal 3 to the extent that it calls for the minimization of risk of contact between bighorn sheep and domestic sheep through collaboration with the State and the use of MOUs. However, it objects to any site-specific management strategies being added to a permittees[rsquo] annual operating instructions ([ldquo]AOI[rdquo]). The State[rsquo]s Management Plan and MOUs are predicated on UDWR[rsquo]s position that [ldquo][t]he only mechanism acceptable to the [UDWR] for altering domestic sheep grazing practices to avoid risk of comingling is through voluntary actionundertaken by the individual grazers. Utah Bighorn Sheep Statewide Management Plan at 2 (2018). It does not support any [ldquo]involuntary restriction, reduction, limitation, termination, or conversion of permitted domestic sheep grazing for purposes of protecting bighorn sheep on public or private property.[rdquo] Id. The issue with including site-specific strategies in AOIs is that they become mandatory under the permits, result in permit action if not complied with, and can be placed within the AOI against objection from the permittee.

While term grazing permits are issued for 10-year periods, the annual grazing under a permit is authorized each year through the issuance of a bill for collection and through preparation of an AOI. See FSM 2200, Ch. 2230, [sect][sect] 2231.41, 231.5 (Sept. 9, 2005). All term grazing permits and associated allotment management plans include a provision that the period of grazing use and stocking number will be designated in AOIs, and other annual maintenance projects are also listed. The permits then always contain Part 2, Section 8(a), which explains that allotment management plans are part of the permit and the permittee is required to carry out its provisions and any other instructions. The AOIs also always contain language that the AOI [ldquo]supplements and becomes part of your Term Grazing Permit.[rdquo] The failure to comply with AOI, therefore, could result in suspension or cancellation of permittee[rsquo]s permit. See 36 C.F.R. [sect] 222.4(a)(4).

Therefore, the inclusion of [ldquo]site-specific management strategies[rdquo] into permittees AOIs will result in voluntary [ldquo]strategies[rdquo] becoming requirements that can be the basis for permit action if not completed. It is not uncommon for a permittee to develop or offer some type of voluntary management action to improve their grazing operations, and the Forest Service will then adopt it within the AOI indefinitely or require it on another allotment. It is then no longer voluntary but mandatory. Placing [ldquo]site-specific management strategies[rdquo] within AOIs moves away from the voluntary best management practices found in the site-specific MOUs developed in collaboration with UDWR, UDAF, the Forest Service, and permittees.

The Coalition requests that reference to AOIs be removed from WILDL Goal 03.

#### V. Conclusion

The Coalition members have sincerely appreciated the opportunity to work with Ms. Eickhoff and her staff to collaborate on the Ashely National Forest LMP revision and the changes that the Forest Service has made as a result of this collaboration. The Coalition looks forward to continue working with the National Forest on these objections and any others that have been submitted, and helping get the Ashley National Forest back to a more

desirable condition to protect its resources and watersheds.

Sincerely,

Eric South, Chairman

Wyoming Coalition of Local Governments