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Ashley National Forest

Attn: Plan Revision Team

355 North Vernal Avenue

Vernal, Utah 84078-1703

Submitted via online portal

RE: Comments on the Ashley National Forest Proposal to Revise the Land Management Plan and Evaluation of Potential Wilderness Inventory Areas

Dear Plan Revision Team,

As a fifth-generation resident of the Uintah Basin who appreciates this region's wild country I am happy to see that the Ashley National Forest is evaluating areas for potential addition to our nation's wilderness preservation system. I appreciate this opportunity to comment on the Ashley National Forest Evaluation of Potential Wilderness Areas.

I have lived most of my life in the Uintah Basin, just south of the Uinta Mountains, and have spent a great amount of time recreating in wild areas of the Ashley National Forest. About twenty years ago I surveyed many parts of the Ashley for the Utah Environmental Congress as part of an inventory of national forest lands in Utah with roadless and wilderness character.

Based on my experiences in the Ashley National forest I can see that the Ashley's current evaluation of potential wilderness areas is fundamentally flawed in several ways. One way it is flawed is that so many wild places have been left out of the evaluation. The closest national forest land to my home is in Uinta Canyon, and I am surprised and disappointed to see that this canyon was almost entirely left out of the evaluation, with only a tiny bit of the topmost part of the east side of the canyon included. I know Uinta Canyon well and I know that the only parts of it that wouldn't qualify for wilderness would be the main road, campgrounds, and a few other small impacts that could've easily been cherry stemmed out.

The Flat Top polygon should not be it's own polygon but should be joined with the South Slope East Uintas polygon, thereby including the wilderness-quality lands of Uinta Canyon. There is a precedent for evaluating all of this land together, because that's the way it was evaluated in the Ashley's 2006 "Evaluation of Undeveloped Areas for Potential Wilderness Draft Information Packet".

Another serious flaw of the evaluation is that the boundaries of the polygons seem so weird and really make no sense to me. For example, the west boundary of the South Slope East Uintas polygon is a zig-zaggy sawtooth shape. For one thing, there is nothing on the ground that would necessitate that shape of boundary - and another thing is that a shape like that would be very difficult to manage as a wilderness boundary. It seems like an unnecessary set-up for failure. And I see that kind of boundary in many places in the polygons. For example, I also see it in the boundary on either side of Whiterocks Canyon. And not only is the boundary overly large and strangely shaped for a cherry stem of the road in the canyon, but the excluded area continues far up the canyon, miles beyond the end of the road and any human impacts.

Then there are the big circular areas that were excluded from the evaluations, that make the polygons look like

swiss cheese. I'm guessing these circles were excluded because of timber sales and other impacts, but I guarantee the impacts are either much smaller on the ground than the circles would indicate, or are non-existent. For example, in the part of the South Slope East Uintas polygon that includes Farm Creek and Buck ridge there are a couple of big circular areas that were excluded from the polygon. The only possible reason I can think of for the circle in the south part of that area is a few tiny little clearings where pinyon and junipers were cut in the past. I don't know if the circle was meant to exclude them, but I think most people wouldn't even notice them and they are certainly nothing to draw a big circle around.

Further up Buck Ridge there is a great big circle of excluded land. I've hiked that ridge before and I know there is nothing there to exclude - there are no roads or past timber sales there. I do know there are some old clear cuts further north, at the top of Buck Ridge, but they aren't nearly as big as the overlapping circles that exclude land there.

Another egregious example of wild land being left out of the evaluation is the area around Audrey Lake and a wide strip of land between Audrey Lake and nearby Bear Lake, in the Rock Creek drainage. I've hiked there and I know it is a very wild, rugged place that is difficult to access. I can attest to the fact that there are no human impacts to be seen there. All I can think is that whoever drew the boundaries wasn't familiar with this area on the ground and saw boulder fields in aerial images and mistook them for clear-cuts or some other man-made impact and excluded them.

It really appears to me that the evaluation area polygons were drawn on a map by people sitting in a building looking at aerial images, and the boundaries appear to have been drawn on a small map using a big sharpie.

Yet another area where the boundaries make no sense to me is the Cow Hollow area. I don't understand why most of Black Canyon was left out and the west side of Ashley Gorge was left out, but a little strip of the east side of Ashley Gorge was included in the polygon. I've spent time in parts of that area, including hiking to the end of the Galloway Spring Trail, and I can see no rhyme or reason for the boundaries of that polygon being the way they are. In the 2006 document the Ashley evaluated 31,869 acres in that area. So I have to ask why only 18,028 acres were evaluated this time. I can't believe there have been that many impacts to that area since 2006.

In 2006 the Ashley evaluated almost 7,000 acres in the Brush Creek area, but this time that area wasn't even evaluated at all. I've spent a lot of time there and the only changes I've seen since 2006 is that some roads have been closed, which should give more not less reason to evaluate the area. I think that if that area isn't going to be evaluated for wilderness it should at least be considered for designation as a research natural area.

The only improvement I can see in this evaluation over the one described in the 2006 document is that the Carter Creek area, which wasn't evaluated then, was included this time. I think that is an area very worthy of wilderness designation. I think the boundaries should be adjusted though, so the private lands in the area are not surrounded by wilderness, and the area that was excluded between Highway 44 and Flaming Gorge Reservoir should be added to the polygon.

I don't have time to explain all of the problems I see with areas that should have been included in the evaluation being excluded instead, but I do want to say that I see that I see the strange boundaries and excluded areas as a fatal flaw in this evaluation.

I think all of the polygon boundaries should be re-evaluated and re-drawn to include the places that were inappropriately left out, and that all of the areas should be analyzed and included in one of the alternatives that is carried forward.

There are several areas in the north Ashley Unit and several in the south Ashley unit that I think should be given top consideration for wilderness designation and they are as follows:

North unit: Big Ridge, Carter Creek, Cow Hollow, Dry Ridge, Flat Top Mountain, Lake Fork Mountain, Mt Lena, North Slope East Uintas, Sheep Creek East, Sheep Creek West, SouthFork Rock Creek, South Slope East Uintas, and Wagon Road Ridge.

South unit: Alkali Canyon, Nutters Canyon, Right Fork Indian Canyon, and Wire Fence.

Another problem I see with the Ashley's evaluation of potential wilderness inventory areas is that so many areas are listed as having no outstanding landscape features - when I think most if not all of those areas do have outstanding landscape features. For example, the Wire Fence area was listed as having no outstanding landscape features, but when I visited that area a few years ago I found something that I thought was very outstanding - and that was big ice flows coming off of a sheer drop-off at the mouth of Mine Hollow, in the far north part of the unit. I've never seen ice flows like that anywhere else.

Also, many areas were listed as being 0% available for primitive recreation. One the areas listed that way was Alkali Canyon. I have primitively recreated there. One December during a relatively snowless winter I hiked up onto a high point on a ridge between the left and right forks of Antelope Canyon and set up a tent and spent the night there. I got up early the next morning and enjoyed spectacular views in the early light.

Thank you for the opportunity to comment as part of this process! Please review all of the boundaries of the potential wilderness inventory area polygons and make the changes necessary to assure that all lands suitable for wilderness are evaluated and analyzed, and please give special attention to the areas I recommended above for top consideration for wilderness designation.

I look forward to continuing to participate in the forest plan revision process.

Sincerely,

Chad Hamblin
concerned citizen