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Title:

Comments: sent: Thursday, November 14, 2019 9:30 PM To: FS-Comments Intermtn Ashley ForestPlanRevision <ashleyforestplan@usda.gov> Subject: Scoping comments for Forest Plan Revision

(1) It is my deep conviction that all roadless areas on the Ashley should remain roadless. The value of roadless areas for wildlife, watersheds and native flora is inestimable. We should protect the areas that we have. Attrition is nothing but destruction by degrees. I am not aware of a single study that demonstrates that roads and motorized traffic have anything but a deleterious effect on wildlife and plant species at risk, watershed, the risk of alien plants and the risk of wildfire (human caused). There are plenty of roads on the Ashley. Even "temporary" roads can have unintended consequences, so the greatest of care should be taken.

(2) The Ashley needs way more law enforcement. I talked to Mathew Wright last winter after skiing in Brownie Canyon and was absolutely appalled by how thin is spread law enforcement on the Ashley. You have alluded to this problem in various recent documents. I am merely reminding you of the crying need, in case you needed reminding. (You probably don't.)

(3) The entire Forest Service has a revenue problem. It may be time to increase operational funds by increasing revenue from FGNRA and established campsites that provide amenities: potable water, toilets, established fire rings, etc. This is entirely reasonable in light of the Ashley's chronic revenue shortage. I realize that the Ashley may be constrained over a large area in this regard by recent congressional legislation. That is unfortunate, but the opportunity to raise fees where possible should not be overlooked.

(4) Because the Ashley, as are most national forests, is hampered by decreased funding, please do not encourage or enable activities that lead to further resource degradation because it may be impossible to mitigate or repair of the damage caused. Damage is easier to prevent than to repair.

(5) With global climate change, protection of water sources, wildlife and native plants will take on new urgency. Such protection will be crucial to the web of life on the NF and to communities who rely on the watershed. Ashley is fortunate (we are fortunate) that the northern units of the Ashley don't have much in the way of recoverable mineral resources, but roads and motorized travel, especially off-road travel, timbering and livestock grazing still have the largest potential impacts. Although these have now become "traditional uses," we should keep in mind that we are entering very non-traditional times. Adjustments will have to be made. The intact natural system, fully functioning, should be the guiding principle.

(6) I am especially concerned by the increase in dispersed motorized use on the Ashley. Although this is a clear "trend," I would point out that obesity (1 in 3 adults, 1 in 5 children) and type 2 diabetes mellitus are also increasing in America, and following certain recreational trends may lead to adverse consequences. I would hope that dispersed motorized use would be discouraged, and that roads and ways that serve no clear purpose or which are degrading identified values be reviewed periodically with a view toward closure.

(7) I urge you to strongly resist or outright reject any collusion with the state of Utah to violate the Roadless Rule, with their manifestly bogus excuses of fire control and noxious weed control. These should be recognized for what they are: Trojan horses, to subvert the intent of the Roadless Rule. Human life and property are most judiciously and efficiently achieved by clearing and thinning around habitations and communities--the wildland/urban interface--and not in roadless areas. Not a few academic papers and Forest Service studies have shown that the risk of fire actually increases with motorized access. Even timber operations have a risk for

human/machine-caused wildfire.

Noxious weeds are almost never found in roadless areas for the simple reason that there is no way to get the seeds there. There are no roads, and therefore no ground disturbance or vehicle-borne seeds. Your recent survey of roadless areas for wilderness suitability on the Ashley in Uintah, Daguerre and Duchesne counties has already identified noxious weeds in roadless areas as a non-problem. In point of fact, roadless areas are your biggest protection against noxious weed invasion.

Logging in roadless areas to prevent catastrophic wildfires is a fool's errand. The sheer volume of timber at risk makes this a Sisiphean task. Further, roads have many adverse effects, especially if poorly designed (erosion, stream siltation, invitation to motorized recreationists, even if closed, leading to further wildfire risk from human activity). Logging itself can increase wildfire risks from slash piles, drying of soils, opening of corridors where wind can play a role in the spread of wildfire, poorly maintained logging equipment, etc. There may be a role for logging in fire prevention, but it should not occur in any roadless area.

The state of Utah and Uintah County have never cared about wild things and places and ecologic integrity, and they're not about to start now. They have done everything to dismantle protection of the public lands in Utah. Talk sweetly to them, humor them, but do not be led astray. Stick to the science and to your own sense of what is right for the Forest. Partnering with the state can be like sleeping with the Devil. (Am I being too hyperbolic?). Be cautious.

(8) In your survey of potential Wilderness in roadless lands on the Ashley the author(s) repeatedly cite attitudes and "positions" of the counties of northeast Utah in regard to wilderness as a matter of their policy on further or new wilderness. These policy positions may inform but should not guide the Ashley in considering wilderness designation on public lands that belong to all Americans. There are plenty of wilderness and primitive recreation advocates out here and around the state, area and nation. We will be heard as part of the process. Whether it be Wilderness with a capital W, or simply management of roadless areas for their primitive qualities, it is very important to preserve the ancestral landscape and its community of wildlife, plants and watersheds that contribute immeasurably to the solitude, health and aesthetic experience of "big country" on the Ashley. Personally, I believe that opportunities should be sought by ANF to add federally-designated Wilderness to the High Uintas Wilderness and would welcome that addition.

(9) I have reviewed your list of SCC species and enthusiastically concur. I am very concerned that sage grouse habitat be preserved wherever it exists, and that activities which put such habitat at risk be curtailed.

(10) I enthusiastically support additions to the Wild and Scenic Rivers system on the ANF. I previously proposed the South Fork of Ashley Creek as Wild and Ashley Creek from the confluence of the North and South Forks through Ashley Gorge as Scenic. I understand this will not be re-studied as part of the Plan Revision. Certainly Uinta River is a prime candidate for Wild status and I urge you to proceed with petition for that designation.

(11) In 2019, it just seems intolerable that the Uintas is not populated by Rocky Mountain Bighorn Sheep. In this day and time is the sheep industry so important, viable or economically important as to make bighorn sheep reintroduction unfeasible? Every effort should be made to make the Uinta Mountains suitable habitat for bighorn sheep reintroduction. To this end, sheep allotments should be terminated whenever possible.

(12) Cattle grazing should be curtailed in areas where it has adverse ecologic consequences. I have seen cattle in inappropriate locales, high in the basins, in alpine regions such as Deadman Lake and Lakeshore Basin. I don't know whether this is because the allotments are not adequately fenced lower in the basins to prevent drift toward the alpine areas and wet meadows, but I doubt that this is ANF policy. These areas should be monitored regularly for intrusions by cattle and every effort made to prevent drifting into alpine areas, critical riparian zones

and wet meadow complexes.

(13) The yurts on Grizzly Ridge and Limber Flag have been very popular and contributed greatly to the recreational spectrum on the Ashley. I talked to Ryan Buerkle about another possible site that we have identified in Whiterocks Canyon and would be happy to work with you in getting another yurt in that site or another.

Well, there you have it: some random thoughts, without getting into specifics. I trust you have and will proceed with the knowledge of your solemn responsibilities, not only to Forest Service stakeholders, but, more importantly, to the community of life that makes the Ashley National Forest its only home.

Please keep me involved with the process.

Thank you for your attention. I shall look forward to the process.

Will Durant, MD