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Ashley National Forest  
Attention: Forest Plan Revision  
355 North Vernal Avenue  
Vernal, UT 84078-1703  
Email: [AshleyForestPlan@usda.gov](mailto:AshleyForestPlan@usda.gov)  
Phone: (435) 781-5118

Ashley National Forest Planning team:

Please consider the following scoping comments for the Ashley National Forest Plan Revision from the Greater Little Mountain Coalition (Coalition). Reviewing the draft Forest Plan, the Coalition is concerned about how angling, hunting, recreation activities, big game health and vitality and watershed health and function will be affected across the forest planning area.

#### The Greater Little Mountain Coalition

The Coalition is an assembly of sportsmen and sportswomen organizations, community leaders, local governments, union members and more than 2,500 engaged hunters, anglers, and recreationists who want to see the Greater Little Mountain Area's (GLMA) valuable landscapes continue to support abundant fish and wildlife populations including the protection of federal and state recognized sensitive species and to provide ample recreation opportunities. The Coalition partners include: Bowhunters of Wyoming, Muley Fanatic Foundation, Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership, Trout Unlimited and Wyoming Wildlife Federation. The Coalition was established in 2008.

#### The Greater Little Mountain Area

This unique high desert habitat region is considered by biologists and resource managers to be some of the most sensitive fish and wildlife habitat in Wyoming. Located in southwestern Wyoming, about 30 miles south of the town of Rock Springs, elevation ranging from 6,040 feet at Flaming Gorge Reservoir to 9,060 feet at the top of Little Mountain and bounded on the west by Flaming Gorge National Recreation Area (NRA).

## Fish & Wildlife Values in the Greater Little Mountain Area

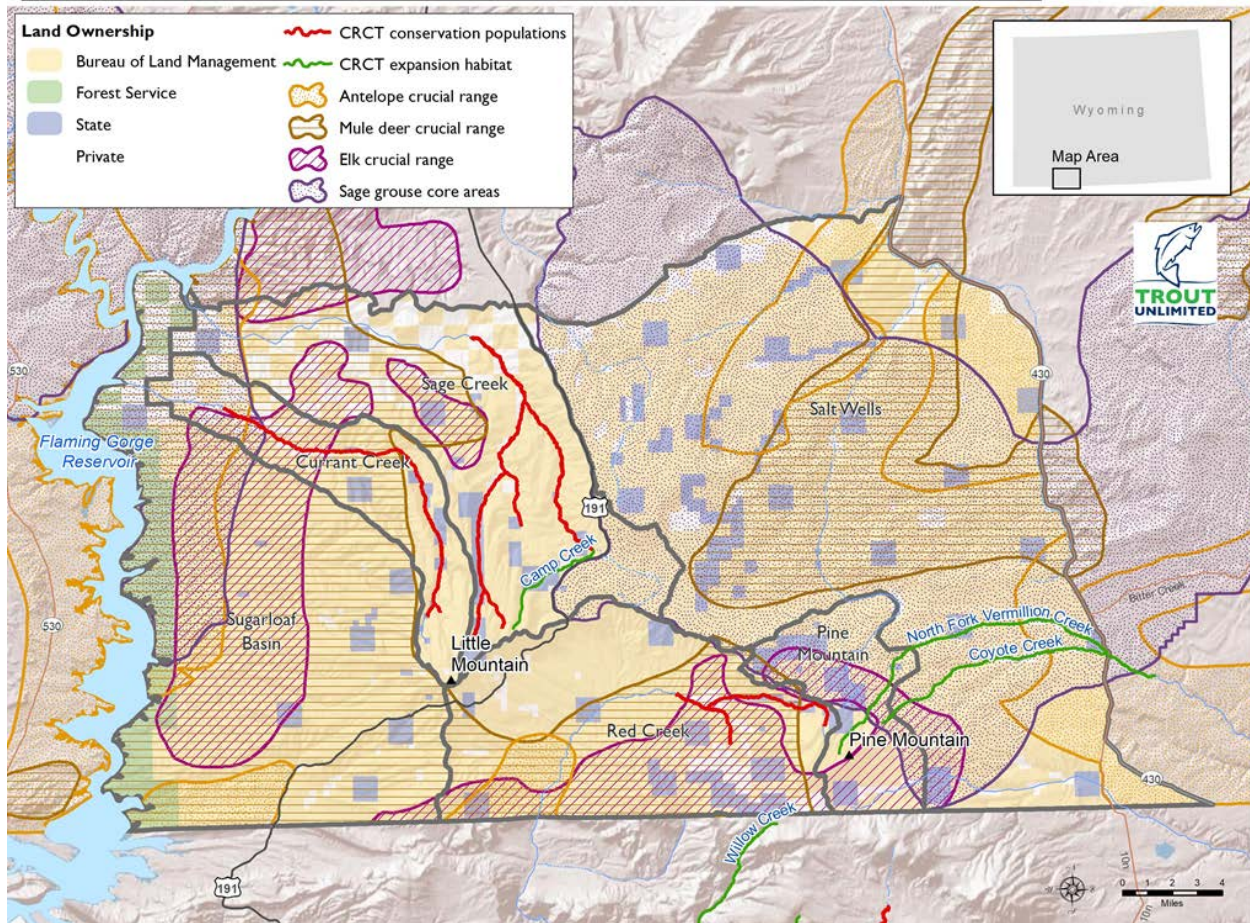


Figure 1. High-value water resources, wildlife and coldwater fisheries in the Greater Little Mountain Area, Wyoming.

### Fish and Wildlife Resources

The area supports populations of elk, mule deer, moose, pronghorn and native, wild populations of trout (Figure 1). Known by locals and non-residents alike for its highly coveted limited quota big game licenses, it remains one of the best hunting areas in Wyoming. Eastman’s Hunting Journal often identifies elk and mule deer hunt areas in this region in the top five of the state. This area is crucial winter range for the South Rock Springs elk herd unit and the South Rock Springs mule deer herd unit. Winter is a critical time for ungulate survival and this area provides much needed refuge habitat for these animals, especially Iron Mountain. Finding forage and cover during the most inclement and difficult of winter conditions already presents many challenges and this undisturbed landscape provides big game herds with those provisions. The GLMA is home to 37 terrestrial species identified in the Wyoming Comprehensive Wildlife Conservation Strategy as “species of greatest conservation need.” Healthy Greater sage-grouse populations inhabit the GLMA with swaths of acreage under the Wyoming Core Area Habitat designation.

This high desert ecosystem also includes streams that provide great trout fisheries for the sensitive Colorado River cutthroat trout with more than 130 miles of stream habitat (critical and

reintroduction habitat) occurring within the GLMA. Six streams host conservation populations of Colorado River cutthroat trout – Currant Creek, Gooseberry Creek, Little Red Creek, Red Creek, Trout Creek and Upper Sage Creek. Colorado River cutthroat trout is a sensitive species recognized by the Conservation Agreement for Colorado River cutthroat signed by the Wyoming BLM, Wyoming Game and Fish Department, US Fish and Wildlife Service, BLM and Wyoming Trout Unlimited with a goal, “To assure the long-term viability of Colorado River cutthroat trout throughout their history range.” Red Creek contains one of the purest genetic strains of Colorado River cutthroat trout.

Since 1990, the Little Mountain region has benefited from over \$6 million in habitat restoration and enhancement projects funded by various state and federal agencies, conservation organizations and private individuals. The local, state, regional and federal entities who contributed financially with both sweat equity and dollars expect a return on their investment by maintaining functionality and connectivity of the GLMA for fish and wildlife objectives. The economic contribution for Sweetwater County alone generated from world-class game and sportfish speak to the high-value outdoor recreation resources of this area. More than 15,000 fishing licenses sold annually in Sweetwater County with anglers spending over \$48.4 million in the last 5 years. Big game hunters in GLMA spent over \$12.7 million in the last 5 years.<sup>1</sup>

#### General comments/Flaming Gorge NRA

The scoping document is incomplete, often confusing and doesn’t appear to follow the 2012 Forest Planning Rule<sup>2</sup>. The desired conditions in the plan are incomplete and many have no objectives and only a few have guidelines. The final directives for desired conditions and objectives, found in WO Amendment 1909.12-2015-1<sup>3</sup> outlines the assessments needed following the guidelines of the Land Management Planning Handbook. For example, at least 38 of the resources have no identified objectives.

The Forest Plan must be enhanced with additional Objectives, Standards, Guidelines, and Suitability of Lands components for riparian management zones, coldwater fisheries, terrestrial vegetation, forest vegetation, non-forest vegetation, wildlife, recreation settings and opportunities of the Flaming Gorge NRA. The draft Forest Plan does not include any science-based discussion of the challenges presented by continuing climate change.

The recreational values (and related desired conditions and objectives) of the Green River, both above and below Flaming Gorge NRA is nearly absent from the draft Forest Plan. Coordination with Sweetwater County Commission, Wyoming Game and Fish Department, state of Wyoming and others is needed to reflect a significant economic analysis included in

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<sup>1</sup> Sweetwater County Related Hunting and Fishing Spending, 2015 For the Sweetwater County Commissioners University of Wyoming, Department of Agricultural & Applied Economics David T. Taylor& Thomas Foulke September 2016

<sup>2</sup> DEPARTMENT OF AGRICULTURE Forest Service 36 CFR Part 219 RIN 0596–AD02 National Forest System Land Management Planning AGENCY: Forest Service, USDA. ACTION: Final rule and record of decision.

<sup>3</sup> WO AMENDMENT 1909.12-2015-1 FSH 1909.12 - LAND MANAGEMENT PLANNING HANDBOOK CHAPTER 10 - ASSESSMENTS

the plan.

The draft Forest Plan has no discussion of coordination between Utah and Wyoming wildlife management agencies. Coordination is critical to maintain consistent standards and monitoring for conserving and protecting fish and wildlife resources. Each species of conservation concern needs to have its own section within the Forest Plan, not just interspersed in the resource sections. For instance, Colorado River cutthroat trout are only mentioned a couple times in the Watershed section.

#### Water Resources/Riparian

Reviewing the draft plan, the Riparian section needs to be more robust and include discussion and desired conditions for all water-related areas. Water is more valuable than gold to sustain Western landscapes, economies, the human environment and fish and wildlife resources. The western flank of the GLMA contains numerous direct tributaries to Flaming Gorge Reservoir, a part of the Upper Colorado River system and a vitally important upstream watershed recharge area for this entire system. Salinity and increased sediment load are already a huge concern for this system. Any released sediment or contaminants, both above and below ground, could move directly into Flaming Gorge Reservoir harming a multimillion-dollar National Recreation Area and water supply for seven state beneficiaries of [the Upper Colorado River Compact](#). Any disturbance of the unstable soils and slope characteristics of the area has the potential to modify aquatic habitat characteristics of waterways and adversely affect aquatic populations and diversity of fish habitat. Multiple springs, perennial and ephemeral streams, fens and wet areas are associated with the eastern boundary of Flaming Gorge Reservoir and suggest that deeper regions of shallow groundwater may be encountered with any disturbance and development.

#### Energy Development

The Coalition does not support any new fluid or extractive mineral development in the Ashley National Forest planning area bounded by Flaming Gorge Reservoir and the GLMA. The Coalition's Management Proposal<sup>4</sup>, submitted to the Wyoming Bureau of Land Management Rock Springs Field Office, includes a recommendation of NSO on BLM lands (Figure 2). The Ashley NF land that bounds Flaming Gorge to the east and the GLMA to the west is a critical buffer and is not the right place for energy development. The risks of development on the shores of Flaming Gorge greatly out-weigh any benefit of disturbing this landscape and it should be left alone to not jeopardize downstream users and for public safety and health.

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<sup>4</sup> Greater Little Mountain Coalition Alternative for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision submitted December 14, 2018.

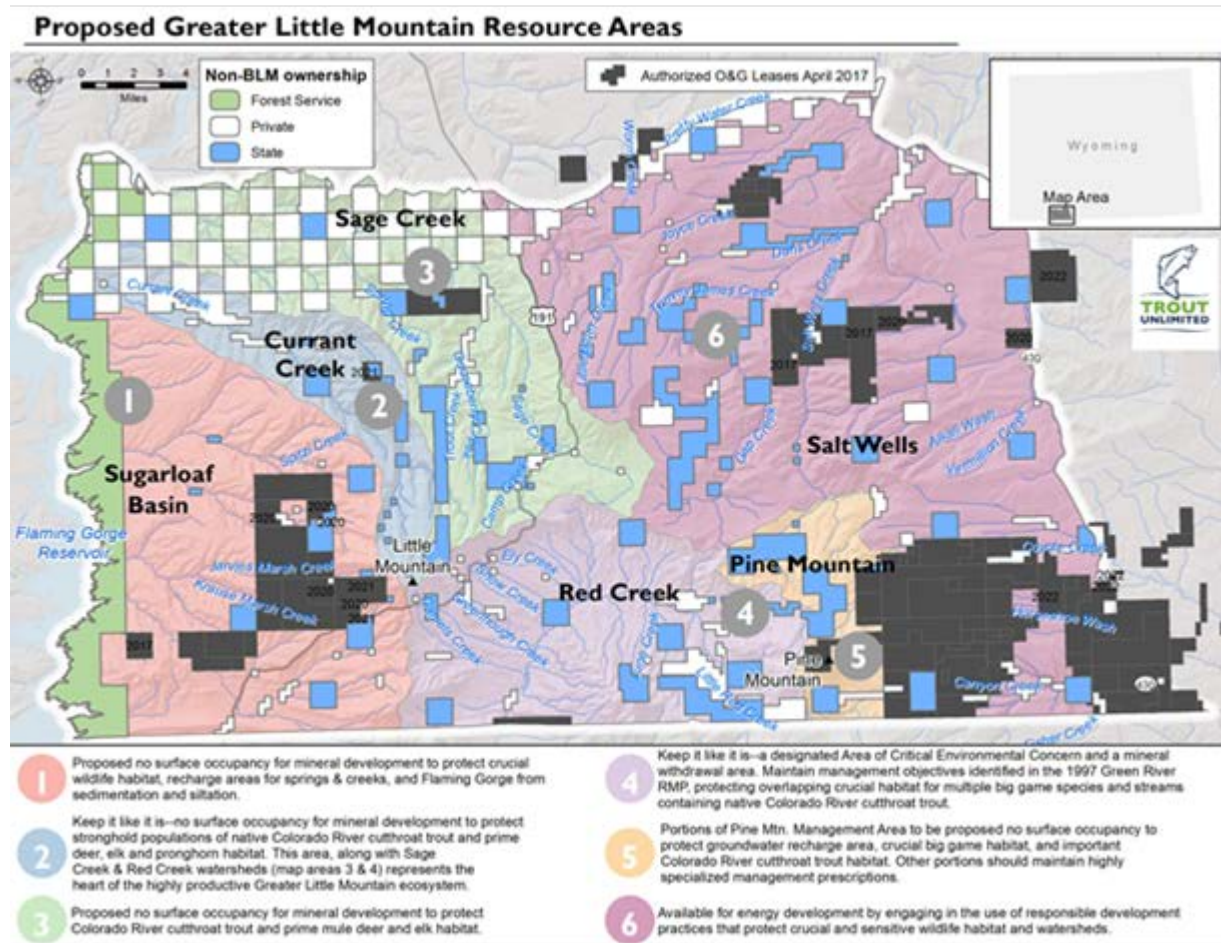


Figure 2. Proposed Greater Little Mountain Resource Areas and Management Prescriptions.

In fact, the draft Forest Plan needs to include mineral exploration directives and a robust suitability analysis and planning direction for oil and gas development, and NOT rely merely on the 1997 Western Uintah Basin Oil and Gas Leasing EIS. The draft Forest Plan must include language that does not allow any lands available for oil and gas leasing that were not included in the 1997 Western Uinta Basin EIS, including the Flaming Gorge NRA and the Green River district. The plan must clearly state that without a site-specific leasing decision, lease nominations cannot and should not be considered.

The Forest Plan needs to consider a full range of alternatives in the analysis, especially for the Flaming Gorge NRA and the Green River district. Any future Right of Ways (ROWs) for alternative energy sources and pipelines should be excluded in the Flaming Gorge NRA including the following: Commercial scale wind farms and solar farms; electrical transmission lines (not service lines) and oil and gas transmission pipelines. This is consistent with the congressionally stated purpose of the Flaming Gorge National Recreation Area (Public Law 90-540-Oct.1, 1968), and it is consistent with Sweetwater County BLM RMP comments for adjacent lands contained in the GLMA. (See SWCO comment #23 and #24 in Ashley Comment Review Chart Oct. 2018).

## Summary

The Coalition is committed to protecting, restoring and conserving the unique fish and wildlife habitat values of the diverse GLMA bounded by the Ashley National Forest. In addition to the comments above, we look forward to working through the planning process and appreciate this opportunity to participate and anticipate working cooperatively with the Forest as this process evolves.

Sincerely,

**Josh Coursey**, Muley Fanatic Foundation

Phone: 307-389-7495

[josh@muleyfanatic.org](mailto:josh@muleyfanatic.org)

**Craig Thompson**, GLMA landowner

Phone: 307-389-2715

[cthompson@westernwyoming.edu](mailto:cthompson@westernwyoming.edu)

**Steve Martin**, Bowhunters of Wyoming

Phone: 307-350-0486

[stmartin@wyoming.com](mailto:stmartin@wyoming.com)

**Nick Dobric**, Theodore Roosevelt Conservation Partnership

Phone: 307-220-0436

[ndobric@trcp.org](mailto:ndobric@trcp.org)

**Tasha Sorensen**, Trout Unlimited

Phone: 307-256-3446

[Tasha.Sorensen@tu.org](mailto:Tasha.Sorensen@tu.org)

**Joy Bannon**, Wyoming Wildlife Federation

Phone: 307-287-0129

[joybannon@wyomingwildlife.org](mailto:joybannon@wyomingwildlife.org)

**Monte Morlock**, United Steelworkers Local 13214

Phone: 307-389-4701

[mhmorlock@yahoo.com](mailto:mhmorlock@yahoo.com)

Cc

Joe Budd, Policy Advisor, Governor Gordon

Sweetwater County Commission

Angi Bruce, Wyoming Game and Fish Department