



November 8, 2019

Cathleen Neelan
Forest Plan Team Lead
Ashley National Forest
355 North Vernal Ave
Vernal, UT 84078

Dear Ms. Neelan,

Thank you for the opportunity to comment on the Ashley National Forest (ANF) Land Use Plan Revision process (Revision). This is the most important National Environmental Policy Act (NEPA) process any forest can undertake, as it will serve as the basis for virtually all ANF projects, programs and actions moving forward. I urge the ANF to be diligent in revising the plan and take the necessary time to complete a robust and thoughtful analysis with engagement of the public, counties, local government, and state agencies.

With regard to the documents provided by ANF, state agencies have spent over a year working with the forest in an attempt to develop clear and reasonable changes to the forest plan. However, multiple concerns still exist and must be addressed. The state agencies have completed in-depth analyses of the provided documents and their specific comments are included with this letter. Although this represents the Scoping period, the agencies have gone into detail and have reiterated comments to help the ANF deliver more complete documents during the next comment period. In addition to the specific comments from the agencies, I would offer the following items for your consideration:

1. Engagement with state agencies and tribes, from both Wyoming and Utah, is paramount. They have special expertise in multiple areas, statutory requirements, Memoranda of Understanding detailing Cooperating Agency status, and federal regulations dictate engagement. I encourage the ANF to engage early and often, as outlined by the Council on Environmental Quality guidance found at 40 CFR 1501.2. Not only does Cooperator engagement improve agency planning, it helps the ANF develop plans that reflect local realities, values, avoids delays later in the process, and helps to head off potential conflicts.
2. The ANF must consider a full range of alternatives and should look to specific comments to aid in this part of the process. Specific comments from the agencies can aid in

alternative development and could be replacements for existing items or part(s) of a new alternative. Agencies have also identified items that are not currently in documents and should be added. It is extremely important the ANF remains cognizant of the role details and specific language play in the forest plan. I would recommend ANF begin by reviewing comments labelled "General Comment" by the agencies and then delve into details on each section.

3. Structure the plan in an easily digestible format. As currently structured, the plan is lacking key components in multiple areas. Additionally, there is interchange between standards and guidelines in multiple resources that is inconsistent and confusing. For example, guidance for some species, which appears to better fit the wildlife section, is found in the riparian section. Similarly, there is a large degree of variability given to each resource area. Including the background and introduction sections (e.g., the Wildlife section is comprehensive, and contains a suite of objectives, standards, guidelines and goals. While the Cultural Resources section is extremely limited). Finally, Appendix B, entitled "Management Approaches", does not appear to contain true Management Approaches as defined on page four of the Proposed Plan and the ANF's variable use of the term "management actions" appears to conflict with guidance in handbooks and manuals. Many of the Management Approaches are actually objectives or guidelines. We recommend a thorough review Appendix B and ensure consistency in the proposed plan.
4. Give proper weight to local experts, such as counties and municipalities. Portions of the ANF, such as Flaming Gorge National Recreation Area, are major components of county and city portfolios and setting. The ANF document lacks detail regarding how the Forest Service will partner with local governments to maintain or contribute to their economic diversification efforts. ANF should give full consideration to their input on items that can impact local economies by reaching out to local governments to better understand the concerns and values of these assets and how a partnership can maximize the recreation and economic benefit from these resources. Additionally, the ANF should seek to align a revised Forest Plan with county land and resource plans, and state plans whenever possible.

My office will continue to be engaged in this process and is always available to help the ANF with the Revision effort. Carefully review the specific comments from the state agencies; they are the experts on the issues they raise and can be an invaluable asset to the ANF in this process.

Thank you again for the opportunity to provide input and I look forward to continued collaboration with the Ashley National Forest.

Sincerely,



Mark Gordon
Governor

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