



COALITION OF LOCAL GOVERNMENTS

P.O. BOX 146
GREEN RIVER, WY 82935

COUNTY COMMISSIONS OF SWEETWATER AND UINTA, AND CONSERVATION DISTRICTS FOR LINCOLN,
LITTLE SNAKE, SWEETWATER, UINTA, AND SUBLETTE - WYOMING

April 8, 2022

VIA EMAIL: comments-intermtn-ashley@usda.gov

Kaleigh Maze, Interdisciplinary Team Lead
Blaine Tarbell, Fire Management Specialist
Ashley National Forest
355 North Vernal Avenue
Vernal, UT 84078

Re: Coalition of Local Government's Comments on the Ashley National
Forest Scoping Notice for the Proposed Forest-wide Prescribed Fire Restoration
Project

Dear Ms. Maze and Mr. Tarbell,

The Wyoming Coalition of Local Governments ("Coalition") submits the following comments on the Ashley National Forest Scoping Notice for the Proposed Forest-wide Prescribed Fire Restoration Project. The Coalition members Sweetwater County, Sweetwater County Conservation District, Uinta County, and Uinta County Conservation District are actively involved with projects on the Ashley National Forest and are currently cooperating agencies on the Ashley National Forest Management Plan revision and the Flaming Gorge National Recreation Area Management Plan revision. The U.S. Forest Service must ensure that this Proposed Project is consistent with the other two ongoing Management Plan revisions.

The Forest Service must reduce wildfire risks and "enhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape." 16 U.S.C. § 6501; *see also* 16 U.S.C. § 475 ("[n]o national forest shall be established, except to improve and protect the forest within the boundaries, or for the purposed of securing favorable conditions of water flows ..."). The Ashley National Forest is in dire condition – tree mortality continues unabated, watershed health is steadily deteriorating, and vegetative conditions have and will produce catastrophic fires. The Proposed Project's objective of increasing the amount of prescribed acres burned yearly on the National Forest will help to move the Forest to meeting desired conditions. The Forest Service, however, must also utilize and coordinate the use of both timber harvests and other vegetation treatments in conjunction with prescribed burns.

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. §§ 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 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. §§ 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 also plays an important role in the socioeconomic well-being of the counties and conservation districts. The Ashley National Forest also includes watershed that supply the municipal watersheds for Sweetwater and Uinta Counties.

II. PRESCRIBED FIRE AS A TOOL TO MOVE AN UNHEALTHY FOREST TO A MORE DESIRED CONDITION

The Proposed Action recognizes that about 820,000 acres or 87 percent of the Ashley National Forest could be characterized as being moderately or very highly departed from their natural, historic regime of vegetation characteristics, fuel composition, and fire frequency, severity and pattern where considerable risk of losing key ecosystem components. Further, about 50 percent of the Ashley National Forest's watersheds are functioning at risk, with watershed vulnerability at moderate to very high for wildfires. The Forest Service must utilize and coordinate the use of both timber harvests and vegetation treatments, including prescribed fires, to move the Forest forward to healthier conditions.

The Coalition stated in comments on the Ashley National Forest Plan Revision Draft Environmental Impact Statement (“DEIS”) that without large timber harvest acres, large prescribed fire acres, and large mechanical vegetation treatments, the Forest would not move to a more desirable condition. The Proposed Action to have an annual prescribed fire objective of up to 24,000 acres per year on the Ashley National Forest will help to bring the Forest back to a desired condition.

This also is a large increase to what has been proposed in the Plan Revision DEIS, where only up to about 900 acres a year are proposed for prescribed burning in areas suitable for timber harvest. Plan Revision DEIS at 40-41, 109-111; *see id.* at 108 (“Combining mechanical treatments with prescribed burning treatments brings the totals to approximately 2,400 acres [per year] for the first decade and 2,100 acres [per year] for the second decade.”). The Plan Revision DEIS also proposes 6,600 to 32,000 acres per year of fuels treatment, which includes wildfires, mechanical treatments, and prescribed burning. *Id.* at 23, 40-41, 75. However, the big focus of the fuels treatments is using mechanical treatments or natural ignited wildfires to manage the resources. *Id.* at 17, 40-41, 117; *see id.* at 111 (“Of the total proposed fuel treatment acres, a quarter to a half are estimated to represent the use of prescribed fire or wildland fire for resource objectives.”). The Forest Service is planning to manage 10 to 20 percent of unplanned, natural wildfires to meet resource objectives. *Id.* at 17, 131. The Coalition has continued to object to the use of wildfires to manage the Forest’s resources and request the Forest Service to amend the Plan Revision DEIS to reflect the Proposed Action’s objective of prescribed burns on up to 24,000 acres per year.

III. PROTECTION OF WATERSHEDS

The Proposed Action states that treatment boundaries would be designed to meet objectives and move areas toward desired conditions, but would not apply to research natural areas, alpine areas, or congressionally designed wilderness areas. Many of the areas that are nationally mapped for prescribed burns and in line for funding are those areas in the wildland-urban interface. While the Coalition recognizes the need and appreciates efforts to reduce fuel loads in areas of high population, the Forest Service must also recognize the importance of protecting watersheds, and mainstems and headwaters. This includes the mainstems and headwaters that are located within and/or outside of designated roadless areas.

As described above, at least 50 percent of the Ashley National Forest’s watersheds are functioning at risk, with watershed vulnerability at moderate to very high for wildfires. Plan Revision DEIS at 58. The increased fuel loads on the Forest and increased stands of dead and dying trees has also increased the risks of wildfire, which will lead to the loss of biological material in the soils, loss of wildlife and habitat, increased runoff into streams and creeks, and threats to municipal watersheds. The northern Ashley National Forest in Utah provides watersheds that feed municipal water supplies for Uinta and Sweetwater Counties in Wyoming. The watersheds also supply water for farms and ranches. The resulting silting of dams and reservoirs from wildfires is both costly to repair and time-consuming. The Forest Service needs to put more emphasis on the

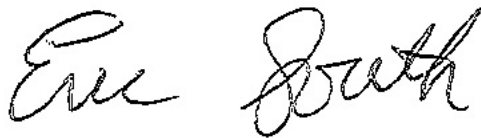
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kinds of projects, including prescribed burns, needed to move both vegetation and watershed health in the right direction.

IV. CONCLUSION

The Coalition appreciates the opportunity to comment on the Ashley National Forest Proposed Forest-wide Prescribed Fire Restoration Project and its members look forward to continuing to work with the Forest Service on a plan that will restore the Forest health and protect important watersheds.

Sincerely,

A handwritten signature in black ink that reads "Eric South". The signature is written in a cursive, flowing style.

Eric South, Chairman
Wyoming Coalition of Local Governments

cc: Governor of Wyoming
Governor of Utah
Wyoming Department of Agriculture
Utah Department of Agriculture
Wyoming Game and Fish Department
Utah Division of Wildlife Resources
Wyoming Office of State Lands and Investments
Utah School and Institutional Trust Lands Association
Utah's Public Lands Policy Coordinating Office
Wyoming Stock Growers Association