



State of Utah

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## Department of Natural Resources

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### Public Lands Policy Coordinating Office

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June 20, 2023

Submitted via electronically: [mary.farnsworth@usda.gov](mailto:mary.farnsworth@usda.gov) and [susan.eickhoff@usda.gov](mailto:susan.eickhoff@usda.gov)

Mary Farnsworth  
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324 25th Street  
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Subject: **Ashley National Forest Plan Revision Final EIS – Objections**

Dear Regional Forester Farnsworth:

The state of Utah (State), through the Public Lands Policy Coordinating Office (PLPCO), has reviewed the Ashley National Forest Service Plan Revision Final Environmental Impact Statement (FEIS). The State appreciated participating in the development of the EIS as a Cooperating Agency. The State, in collaboration with the Utah Department of Agriculture and Food (UDAF), submits the following technical comments and objections to the Final EIS, the Draft Record of Decision (DROD), and the Draft Land Management Plan (forest plan) for your consideration.

The State supports the Forest Service's decision to revise the forest plan and to make the necessary updates. The State has worked with the Forest Service as a Cooperating Agency from the beginning of the forest plan revision process. The State expresses gratitude to the Forest Service for collaborating with the State to develop a new forest plan. The State especially appreciates Ashley National Forest Supervisor, Sue Eickhoff, for her leadership and willingness to work with and listen to the Cooperating Agencies. We support the Forest Service and believe that we can successfully find resolutions as we work together through the objection process.

The State’s previous comments made clear our concerns with certain aspects of the forest plan. The objections are in relation to the topics of mountain goats, Recreation Management Areas/Destination Recreation Management Areas/Recreation Opportunity Spectrums, and domestic sheep grazing near bighorn sheep. The State requests the Forest Service revise and make the necessary changes to the following objections.

The State, as a Cooperating Agency, is automatically granted interested party status, and formally notifies the Forest Service as the Reviewing Officer, that the State is interested in all specific objections that may be filed and requests an opportunity to participate in all resolution meetings to protect the State’s interests.

Pursuant to regulation 36 CFR § 219 Subparts A and B we hereby file the following objections to the 2023 FEIS, DROD, and draft forest plan. The State looks forward to working with the Forest Service throughout the objection process to implement the best version of the forest plan.

### **Objection 1: Mountain Goats**

The State objects to the exclusion of references to the Utah Mountain Goat Statewide Management Plan.<sup>1</sup>

#### **Recommendation:**

The Forest Service should reference the Utah Mountain Goat Statewide Management Plan as a management action, stating that the Forest Service will adhere to the State’s management plan. The State suggests the following language be included in the FEIS, Final Record of Decision (FROD), and forest plan, ***“Work with the State of Utah to utilize the Utah Statewide Mountain Goat Management Plan to apply site specific management strategies to minimize the risk of contact and pathogen transfer between mountain goats and bighorn sheep.”***

The State commends the Forest Service for referencing mountain goats in Appendix D of the FEIS. For example, page 20 says, *“Other species such as mountain goats may also carry pathogens that cause respiratory disease in bighorn sheep (Highland et al. 2018; Wolff et. al. 2016; Wolff 2018). Mountain goats often overlap bighorn sheep habitat and occur in high, rugged terrain, such as the Uinta Mountains. A study in Nevada found that mountain*

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<sup>1</sup> Utah Mountain Goat Statewide Management Plan, available at [https://wildlife.utah.gov/pdf/bg/mtn\\_goat\\_plan.pdf](https://wildlife.utah.gov/pdf/bg/mtn_goat_plan.pdf).

*goats may have been a carrier of pathogens that caused a pneumonia outbreak in bighorn sheep in the same area (Wolff et. al. 2016; Wolff 2018). A mountain goat harvested in 2018 was the first mountain goat to test positive with Mycoplasma ovipneumonia in the Uinta mountains and the prevalence of the pathogen in the mountain goat herds in the Uinta mountains is uncertain (UDWR 2019b).*” The acknowledgement and reference to the risk of pathogen transfer from mountain goats to bighorn sheep is important. However, there is no reference in the plan to the Utah Mountain Goat Statewide Management Plan and no references of mountain goats in this manner in the forest plan. Mountain goats are a species managed by the Utah Division of Wildlife Resources (UDWR). It is vital for the Forest Service to adhere to the State’s management plan for the species.

Both the Utah Bighorn Sheep Management Plan and Mountain Goat Statewide Management Plan are essential documents used to mitigate pathogen transfer among wildlife.

The Utah Mountain Goat Statewide Management Plan can be found here: [https://wildlife.utah.gov/pdf/bg/mtn\\_goat\\_plan.pdf](https://wildlife.utah.gov/pdf/bg/mtn_goat_plan.pdf). The wildlife section of the forest plan has no reference to mountain goats and excludes acknowledgement of this species. The Forest Service should include information about the population of mountain goats, their geographic location, and distribution in the Ashley National Forest. Of particular concern is any geographic overlap with bighorn sheep. Inclusion and reference of consistency with the Utah Mountain Goat Statewide Management Plan is essential for proper management strategies to be implemented to reduce risk of pathogen transmission. The forest plan freely acknowledges that potential risk of pathogen transfer can occur between domestic sheep and bighorn sheep but fails to recognize that pathogen transmission can also occur between mountain goats and bighorn sheep.

Previous Comments:

The State submitted comment letters in March 2019, November 2019, March 2021, and February 2022, discussing the concerns with management of potential risk of pathogen transfer to bighorn sheep.

**Objection 2: Recreation Management Areas/Destination Recreation Management Areas/Recreation Opportunity Spectrums**

The State objects to the designation of Recreation Management Areas/Destination Recreation Management Areas/ Recreation Opportunity Spectrums that negatively affect livestock grazing, or that may negatively affect livestock grazing in the future. The Forest

Service should either remove the designations that could negatively impact livestock grazing, especially when such designations reduce stocking rates or increase conflicts with recreationists and livestock or adjust language throughout the planning documents to specify that grazing is permitted under any recreation designation despite it being designated for such purpose. In the FEIS page 16 and DROD pages 14-15 the Forest Service designates three Recreation Management Areas: Backcountry, General, and Destination.

This is of particular concern for the State because under 36 C.F.R. § 222.4 (a)(1) the Forest Service is permitted to cancel grazing permits where lands are “devoted to another public purpose[.]”<sup>2</sup> Here, the recreation areas specified in the plans have been grazed for decades. By designating these areas for a specific public purpose, this opens the door for the Forest Service to cancel grazing permits in the future in these recreation areas. The State has an interest in keeping grazing permits open long into the future. The State fully supports recreation on the Ashley National Forest and hopes to see ongoing and increasing responsible recreational use. But recreation and livestock grazing are almost always highly compatible uses that, with proper education, can occur side-by-side without conflict in a multiple-use landscape such as the Ashley National Forest.

The State’s previous comments have discussed in detail its concerns with aspects of the forest plan negatively impacting livestock grazing. Establishing Recreation Management Areas at the expense of livestock grazing or other multiple uses is in direct violation of several laws. Destination Recreation Management Areas (DRMA) are of concern as the designation of these recreational areas can exclude livestock grazing in some areas. For the same reasons, the recreation opportunity spectrum also poses certain risks to livestock grazing. The State’s concern is that the DRMAs could continue to be established and exclude livestock grazing in more areas. Livestock grazing is an authorized multiple use of the land under the National Forest Management Act (NFMA), the Multiple-Use, Sustained-Yield Act of 1960, and 36 C.F.R. § 219.10 and should not be phased out nor excluded due to more recreational designations on the forest.

Recommendation:

The Forest Service should reduce the size of the Recreation Management Areas, most importantly the DRMAs. The State recommends removing all DRMAs overlapping with active livestock grazing allotments and any wildlife habitat identified in Table 3-41 for At-Risk Species in the FEIS.

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<sup>2</sup> 36 C.F.R. § 222.4 (a)(1)

Previous Comments:

The State submitted comment letters in March 2021 and February 2022 discussing concerns with the size of RMAs and DRMAs.

**Objection 3: Guidelines 09, 10, and Goal 03 (FW-GD-WILDL)**

The State objects to Guidelines 09, 10, and Goal 03 under the Wildlife Section (FW-GD-WILDL). These guidelines and goal assume that all domestic sheep allotments waived without preference are near bighorn sheep. The State’s concern is that adequate separation from domestic sheep allotments for bighorn sheep is unclear and could leave domestic sheep grazing permittees at risk. The full potential of disease transmission is outside of the control of the Forest Service and has been addressed in the Utah Bighorn Sheep Statewide Management Plan. That plan is the guiding document on bighorn sheep issues and should be referenced, but not included as conditions, in annual operating instructions (AOI).

Appendix A on page 38 for the forest plan states that the Forest Service staff could modify existing domestic sheep grazing permits, allotments, or terms and conditions by, “*altering the timing, intensity, and availability of permitted grazing*” for the benefits of bighorn sheep. The State is concerned that such actions could lead to further losses of AUMs that could harm the domestic sheep industry. Alterations of the availability of permitted grazing for the protection of bighorn sheep, without the consent of livestock grazing permittees, are inconsistent with the Utah Bighorn Sheep Statewide Management Plan, which states that:

“UDWR does not support involuntary conversions or relinquishment of public land grazing AUMs or allotments for the benefit of wildlife. UDWR supports increases in public land grazing AUMs where the forage conditions that precipitated reductions have adequately improved.”<sup>3</sup>

Provisions of the forest plan related to the balance between bighorn sheep and domestic sheep should be consistent with the Utah Bighorn Sheep Statewide Management Plan, and the State therefore objects to Guidelines 09, 10, and Goal 03 as presently written.

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<sup>3</sup> Utah Bighorn Sheep Statewide Management Plan, at 10, available at <https://wildlife.utah.gov/pdf/bg/bighorn-plan.pdf>.

Recommendation:

Edit the following two guidelines and goal to read as follows:

Guideline 09: “When a domestic sheep or goat grazing permit for an allotment in proximity of bighorn sheep herds is voluntarily waived without preference, then authorized use of the allotment should work towards separation of domestic sheep and bighorn sheep by one or more of the following methods: (1) mitigate the threat of pathogen transfer between bighorn sheep and domestic sheep and domestic goats consistent with the most current Utah Bighorn Sheep Statewide Management Plan, (2) mitigate the threat of pathogen transfer between bighorn sheep and domestic sheep and domestic goats in accordance with reasonable management guidelines pursuant to a new site-specific memorandum of understanding, (3) work with the State of Utah to remove or translocate bighorn sheep.

Guideline 10: “New permitted domestic sheep or goat allotments may be authorized when the Ashley National Forest in cooperation with UDWR, and grazing permittees can develop a site-specific MOU<sup>4</sup> to mitigate threat of pathogen transfer and reduce or eliminate bighorn contact with domestic sheep or domestic goat allotments. This guideline does not apply to use of pack goats for recreational use, nor to existing domestic sheep or goat grazing permits waived with preference.”

Goal 03: “Minimize the risk of contact between bighorn sheep and domestic sheep or domestic goats through collaboration with the State of Utah, by utilizing memorandums of understanding and applying reasonable and relevant site-specific management strategies that strive to minimize the risk of contact between the two species.”

Previous Comments:

The State of Utah submitted comment letters in March 2019, November 2019, March 2021, and February 2022, discussing concerns with management of potential risk of pathogen transfer to bighorn sheep.

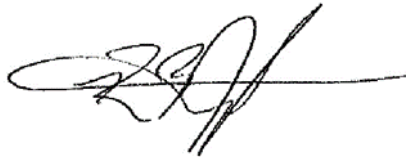
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<sup>4</sup> This references the existing the Big Horn Sheep Statewide Management Plan, not a new plan.

**Conclusion**

We again express our appreciation to the Ashley National Forest personnel for their vigorous work and collaboration with Cooperating Agencies. We are confident that we can find reasonable solutions to the objections we are submitting and look forward to working further with the Forest Service. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Johnson', with a long horizontal line extending to the right.

Redge B. Johnson  
Director

## Technical Comments and Objections on the Ashley National Forest Land Management Plan

Pages 1 and 38: Tribal ancestral homelands of the Ute and Eastern Shoshone are depicted in Figure 1-2. However, Figure 1-2 in Appendix 1 only shows Ute boundaries. Do they overlap?

Page 5: Area Management – the term “parcels of land” is used here; but are there actually parcels of land within the forest? The use of the term “parcel” is not recommended here. Perhaps “areas” of land would be more appropriate here since this is the Area Management Section of the document.

Page 7: *In the Uinta Basin, the most popular recreation activities are* **(should this be “in the Ashley National Forest”?)**.

Page 8: (last paragraph): *...a host of services, such as land-and water-based recreation...*

Page 10: Air Quality: Insert a plan component to reduce air pollution from natural fire ignitions by working to extinguish 90% of them (see Fire Objective 02 on Page 30).

Page 12: Guideline #2: Providing ground cover will protect soils from erosion but may not be sufficient to *prevent recreational use*; but perhaps could *discourage recreational use*.

Page 12: Table 1: The third column heading should be amended to clarify that 8-foot length logs is the minimum length, not the exact length desired.

Page 16: Guideline 04: The guideline should address and prohibit launching of watercraft from shorelines to fight the spread of invasive species.

Page 18: Terrestrial Vegetation: Herbivory or browsing should also be listed as one of the common drivers and stressors of vegetation.

Page 21: At-Risk Plant Species: Goal 01: Cooperation with Tribes should also be stated as many at-risk species are important to tribes or occur on tribal lands abutting the ANF.

Page 21: Aspen Guideline 01: Please clarify whether search and rescue activities constitute an emergency where driving over persistent aspen areas would be allowed.



Page 28: Sagebrush Objective 01: Please clarify whether the objective is to reduce *sagebrush canopy cover* from 20% to less than 5% or is the objective to reduce *conifer canopy cover* in those areas.

Page 31: Fire Guideline 03: This guideline appears to be inconsistent with Fire Objective 02, which provides for management to achieve resource objectives on only 10% of ignitions.

Page 35: top of page... Predation should be added to the list of threats to wildlife.

Page 38: Areas of Tribal Importance. In the 3<sup>rd</sup> paragraph, using “including concerning” together seems grammatically awkward.

Page 39: Goal 02: Tribal traditional ecological knowledge is considered important but the TEK of those who have settled and used the forest area since the 1800’s is not mentioned in the plan.

Pages 41 & 42: Timber: Factor 6 for unsuitability is that the land is not forest land. This is not consistent with the footnote under Table 10 which bases unsuitability on not being National Forest System lands. There is a lot of land that is National Forest System land that is not forest land (but contains difference vegetation communities).

Page 42: Timber: *79,600 acres not suitable for timber production may be eligible for timber harvest by exception.* This section should clarify what conditions or regulations make these 79,600 acres unsuitable. This section should also clarify that timber harvest can occur in the IRAs under certain circumstances or exceptions.

Page 44: Timber Objectives 01 and 02: Are the quantities in the two objectives meant to be the same (3,806 CCF and 1,145 MBF) or should they be different (given that 01 is associated with timber meeting utilization standards while 02 includes fuelwood, biomass and other products not meeting utilization standards)? In Objective 02, is the reference #9 supposed to be 10 as in Objective 01?

Page 48: Energy and Minerals: Paragraph 5, replace “measure” with “measures”

Page 54: Trails: Since trail classifications are mentioned in the objectives, some discussion of the various classes should occur in the initial findings of this section.

Page 55: Trails: Desired Conditions 08: Since “*nonmotorized*” is not defined in the Glossary, please note here whether E-bikes are allowed on Ashley NF nonmotorized trails.

Page 55: Trails Goals: Just as the Ashley should coordinate with the Ute Indian Tribe to restrict OHV access from the forest to tribal lands, the Ashley should coordinate with counties in the planning area who have adopted Trails Master Plans, when such plans call for projects within or partially within the forest boundaries. Such coordination should include joint efforts to obtain grant funding to perform cultural resource surveys, train and equip trail construction crews and construct planned trails projects.

Page 55: Trails: Please include an objective or goal to increase the width of motorized trails to accommodate today's increasingly wide OHVs where such increases would not adversely impact resource values.

Page 57: Table 14: Are the Winter acreage and percentage columns necessary in this table? They give the impression that no acreage in the forest is available for wintertime recreation.

Page 62: Standard 02: replace "Allowed" with "Allow".

Page 62: Guideline 01: It may be difficult for the ANF to determine whether a special use recreation event has displaced or conflicted with 90 percent of other forest users during the event. Perhaps it would be better to encourage persons displaced to file a report with the ANF so event organizers could seek to eliminate or address the conflict during future events.

Page 63: Guideline 01: The plan should provide guidelines for large events over 75 people, such as the **Rainbow Family of Living Light National Gathering**. This gathering occurred on the Uinta-Wasatch Cache National Forest near Heber City in 2014 and created many problems, with an estimated cost to the USFS of about \$500,000.00. The event could just as easily occur on the Ashley in the future.

As stated at: <https://www.fs.usda.gov/detail/r2/home/?cid=fseprd1011858>, the Rainbow Family is a loose-knit group of people from throughout the United States and other countries who gather annually on a national forest. Since the first gathering near Strawberry Lake on the Arapaho National Forest in 1972, the incident has taken place in a different national forest each year. Crowds typically range from 2,000 to 10,000 forest visitors. The specific location and timeframe of the national gathering is not typically revealed to the Forest Service until mid-June when the Rainbow Family holds a spring council.

The gathering usually coincides with the Fourth of July, with peak activity in the days immediately before and after the holiday. In response, the USDA Forest Service mobilizes a national incident management team with experience managing these types of incidents. The

team works closely with the local community, including law enforcement agencies, throughout the incident to protect the health and safety of everyone involved, and to lessen environmental impacts to the site by providing information and enforcing laws.

The Forest Service requires a special use permit for every public group of 75 people or more conducting a meeting or event on National Forest System lands. However, the Rainbow Family has consistently refused to comply with the permit process during national gatherings. They claim to have no leaders and no one member of the family who can speak for the group to sign a permit on behalf of the family [then how do they have a Spring Council and make decisions?].

The Forest Service has periodically cited Rainbow Family members for failing to obtain a permit. However, in the interest of public health and safety, the Forest Service puts together a resource protection plan including specific design criteria to ensure sensitive resources are protected, environmental damage is minimized, and it stipulates post-event clean-up and rehabilitation of the incident location – conducted by the Rainbow Family. An event of this size can have significant impacts on traffic, communities, local resources, residents, and visitors. Local businesses can expect to see large numbers of Rainbow Family participants visiting stores and buying food and supplies along routes to the gathering site. Forest and county roads in the selected area may become congested during the incident and road closures and/or traffic detours may occur on the selected National Forest. The event has created issues for law enforcement associated not only with traffic congestion, but shoplifting/theft, illegal drug use, assault, and murder. The Forest Plan should provide guidelines on how to regulate such events.

Page 65: Scenery Guideline 02: This guideline may be problematic for projects such as the Uintah Basin Railway given the High SIO along Highway 191 in the Indian Canyon area.

Page 65: Scenery Guideline 03: This guideline may be problematic for forest health projects in areas not suitable for timber production where the treatment would be visible from the 709,700 acres of land designated for very high and high scenic integrity objectives.

Page 67: Lands Special Uses: A two-level screening process and screening criteria are mentioned but there is no indication of what that process entails or what the criteria are.

Page 67: In the discussion of the Central Utah Project, it would be helpful to refer the reader (either in the text or in Footnote 12) to Figure 1-5, which depicts the lands withdrawn from forest management for CUP project use.

Page 67: Desired Condition 01: ...that cannot be reasonably accommodated on other lands.”

Page 73: Flaming Gorge Desired Conditions 08 and Guideline 02: This DC and guideline could be problematic for the proposed ski resort in Daggett County if located within the FGNRA.

Page 74: Flaming Gorge Goal 03: ...to identify the economic costs and benefits of recreation... This suggested edit reflects the fact that local entities are incurring costs; such as landfill expansion projects due to large amounts of solid waste generated by recreational use.

Page 75: High Uintas Wilderness Desired Condition #7: Human-caused surface disturbances existing when the area was designated in 1984 (such as Sno-Tel sites, water impoundments and canals) should be allowed to continue (see High Uintas Management Approach #2, Page 3-12).

Page 75: Please insert an appropriate plan Suitability component that confirms the suitability of livestock grazing within the wilderness.

Page 78: Inventoried Roadless Areas: If these 794,590 acres of land were truly roadless, there would have been no need for the rule to establish prohibitions on road reconstruction within those areas.

Page 78: The definition of a roadless area for the 2001 Roadless Rule included: undeveloped areas **typically exceeding 5,000 acres** that met the minimum criteria for wilderness consideration under the Wilderness Act and that were inventoried during the Forest Service’s Roadless Area Review and Evaluation (RARE II) process, subsequent assessments, or forest planning. **With this 5,000-acre threshold, roadless areas down to 398 acres in size seem to be inappropriate.**

Page 80: The plan should give the reader more information on the four river segments deemed eligible; but none of which were determined to be suitable. Either include in plan or refer to another document.

Page 83: Historic Ranger Stations: This section should mention the status of the historic Stockmore and the Indian Canyon Ranger Stations.

Page 85: Destination Recreation Management Areas: Objective 02: ...emphasizing areas with higher use and in a deteriorated condition or a condition that does not accommodate modern recreational vehicles.

Pages 86-87: Please add a plan component recognizing that many of the counties within the ANF (such as Daggett, Duchesne, and Uintah) have Trails Master Plans and that the ANF intends to coordinate with local governments as they seek to implement such plans for projects within the ANF.

Page 88: Backcountry Recreation Management Areas: please clarify in a plan component or in the Glossary (Page 109) whether **E-bikes** are considered motorized transportation or mechanized transportation.

Page 2-1: The table on this page is described as “Table 42” in the text. The table heading and the table of contents (Page iii) uses Table 2-1.

Page 3-1: Working and Coordinating with Tribes, Partners, and Cooperators: Please consider a management approach that seeks to coordinate with the states of Utah and Wyoming and local counties as they develop, amend, update and implement their Resource Management Plans.

Page 3-4: Soils #5: ...in areas disturbed by wildfire, recreation, or other impacts...

Page 3-6: Fire #1: ...and potential resource impacts, and with the participation of other...

Page 3-6: Fire #3: Clarify that the use of fire in this case refers to prescribed fire; not unplanned natural ignitions (where Objective 02 on Page 30 limits using unplanned ignitions for resource management objectives only 10% of the ignitions over ten years).

Page 3-6: Fire #4: This management approach seems to conflict with Objective 02 on Page 30 (which limits using unplanned ignitions for resource management objectives to only 10% of the ignitions over ten years).

Page 3-9: Energy and Minerals #2: Clarify whether “voids greater than 12 inches” is referring to width or depth.

Page 3-9: Transportation and Infrastructure: #5: It seems that signage may be needed to warn of hazards resulting from weather-related or other events that don’t reach the level of being “catastrophic”.

Page 3-9: Trails: Please consider a management approach that seeks to coordinate with local counties as they develop, amend, update, and implement their Trails Master Plans.

Page 3-10: Geologic Resources and Hazards: Allow public use of caves unless restrictions are necessary to protect values or resources present in significant caves, **or to protect the public from hazardous conditions.**

Page 3-11: Land Status and Ownership: #5: Special use permits for land uses **and recreation events** should include operation and maintenance plans **and reclamation plans** that address health and safety, resource protection, and operating procedures **and site restoration upon termination of the land use or conclusion of the event.**

Page 3-11: Flaming Gorge NRA: #3: In the first sentence, should “cultural” be replaced with “silvicultural”?

Page 3-12: Historic Management Areas, Swett Ranch: #2: Recommend inspecting the Swett Ranch buildings, fences, and farm equipment every year prior to opening the ranch to the public to address maintenance needs that evolved over the winter to reduce the liability exposure of the ANF.

Page 3-12: Historic Management Areas, Ute Mountain Fire Lookout Tower: #2: Recommend inspecting the Ute Fire Tower, outbuildings, and historic weather station every year prior to opening the tower to the public to address maintenance needs that evolved over the winter to reduce the liability exposure of the ANF.

Page 3-12: Historic Management Areas, Historic Ranger Stations: #2: Recommend inspecting the historic ranger stations, outbuildings, fences and related facilities every year prior to opening the stations to the public to address maintenance needs that evolved over the winter to reduce the liability exposure of the ANF.

Page 5-1: At the end of the first paragraph, there is reference to “Figure F-1” but no indication of where that figure is located (in Appendix F?).

Page 5-1: John Wesley Powell wasn’t around when Flaming Gorge Reservoir was created. Perhaps he named it the “canyon”?

In Appendix 5, Pages 6 and 7 should be numbered as 5-6 and 5-7 to be consistent with the remainder of the appendix.

Page 5-6: South Unit Scenery: last sentence of first paragraph: ...are visible relics of the ranching history in the area **and** contribute to historic scenic character.

## **Appendix E – Compatibility with Other Plans**

Page 2: The USFS consistency review was based on state and local plans as they existed in 2018. The last paragraph on this page should be amended to reflect this.

### **Grazing:**

1. State and local plans call for no reduction in AUMs. The USFS plan does not guarantee this but will decide AUMs based on site-specific conditions (see middle of Page 8). That complies with our plan policies to avoid one-size-fits-all standards.
2. State and local plans encourage the use of grazing to reduce fuel loads (see Page 14, #5). The Ashley plan does not envision grazing as a tool for fuel management (for example response, see Page 22, #5). This seems to be an easy amendment to achieve consistency with state and local plans.
3. State and local plan policies urge federal agencies not to reduce livestock grazing AUMs to support wildlife or non-native species needs (see Page 23, #3). The Ashley FP makes no commitment here but refers to the authorities of state wildlife management agencies.

Page 9: replace “sheet” with “sheep” in top paragraph.

**Wild and Scenic Rivers:** State and local plans encourage no additional designations. The Review Findings (first example on Page 11, also Page 16, 31) should be amended to indicate that the four streams in Daggett County determined to be eligible were found not to be suitable. Page 24: Wild and Scenic Rivers: Since the four eligible streams were in Daggett County, the review findings should note this and that all four were found to not be suitable for designation in the FP. On Pages 46-47, the review findings for the Sweetwater County RMP should clearly state that no rivers were found suitable in the Ashley plan revision.

**IRAs:** The Utah RMP calls for no roadless areas to be included in the USFS plan beyond that which were identified in the 1977 second roadless area review (RARE II). The Ashley plan recognizes the areas established by the 2001 Roadless Area Conservation Rule and makes no changes to those designations (see sample review findings on Page 17 and 43).

**Land Disposal and No Net Loss of Private Lands:** State and local plans encourage federal agencies to dispose of lands not needed to fulfill their missions and to avoid acquisition of

private lands. The Ashley FP does not include direction for disposal of federal lands, but they recognize that land exchanges or acquisitions will be decided on a site-specific basis (see Page 13, #1 and #2).

**Special Designations:** State and local plans discourage additional special designations that restrict economic growth and activity (see Page 13, #6). The Ashley plan does not remove any existing special designations, but it does not add new ones (no new wilderness, WSRs, NRAs, IRAs, WSAs or RNAs).

**Forest Restoration:** Some state and local plans call for the USFS to conduct a study to determine the economic viability of forest thinning projects. The Ashley plan does not call for such a study (see Page 14, #7). However, the ANF does recognize the need to do some timber harvest to achieve desired vegetation conditions and support the local timber industry.

**Special Designations in the South Unit:** The Duchesne County RMP calls for no special designations in the South Unit due to the energy resources in that area (see Page 15). The Ashley Plan continues with the existing roadless designations but establishes no additional special designations in the South Unit.

Page 18: The 3<sup>rd</sup> bullet point is not applicable to consistency with the Duchesne County RMP as the Ashley Karst NREGA is located within Uintah County.

Page 18: Threatened, Endangered and Sensitive Species: reference is made to the Uintah County RMP here, but the analysis of that plan starts on Page 25.

Page 24: Threatened, Endangered and Sensitive Species: Reference is made to the Uintah County Plan, but this section is addressing the Daggett County plan.

**Energy and Minerals:** Pages 26-27: The Uintah County plan calls for energy and mineral development on federal lands within the Uintah Basin Energy Zone and the Uintah Minerals Management Plan. The Ashley plan does not evaluate or make determinations on mineral leasing but relies on the previous “Western Uintah Basin Oil and Gas Leasing EIS and Decision” (see Page 9 of the ROD).

**Travel Management :** Page 28: The Uintah County RMP calls for no additional FS road closures and the reopening of closed roads. The review findings indicate that travel management is a separate process. Sue Eickhoff has indicated that Ashley intends to revisit travel management soon after the forest plan revision is complete.



**Wilderness:** State and local plan policies oppose additional wilderness designations. In the consistency review within Appendix E, most sections mention that no new wilderness is being proposed in the plan. However, in the Sweetwater County review findings (see Page 46), this aspect of Alternative B Modified is omitted.

## **Appendix H -- Response to Comments**

Page 2: In Table H-1, there are two footnotes<sup>1</sup> but no explanation of the footnote at the bottom of the table. These footnotes are associated with letters submitted by Duchesne County and the State of Utah.

Page 12-13: Issues with acronyms have been addressed as requested.

Page 18: Comment about Alternative C and fire/emissions was addressed.

Page 20-21: Comment about bighorn sheep management and adaptive grazing management addressed.

Page 22, 24: Comment regarding Alternative C impacts on water yields addressed.

Page 48: In two instances in the top paragraph, replace “Uintah” with “Uinta”.

Page 50-51: Good explanation here regarding the requirements for consistency with other plans.

Page 70: Revisions were made as requested to show the lands that have been withdrawn by the CUP.

Page 74: Grazing response #1 is consistent with the working group’s desires to avoid one-size-fits-all regulations and bring standards to the allotment level.

Page 90-92 and 98-99: Willingness to widen trails from 50 to 60 inches is confirmed as requested.

Page 92: #8 “92ithin92”? and “92ithin”?

Page 98: County Trails Master Plans were reviewed in comparison with the ROS maps.

Page 104: Recommended edits associated with Scenic Byways were made.

Page 111: Socio-economic issues have been addressed.

Page 156-157: Good explanation why individual forest wilderness reviews don't violate the Utah Wilderness Act.

## **Draft Ashley National Forest Plan ROD**

Page 2, below Figure 2: *Mountain elevations range from 5,500 feet on the Green River...* **(this is not a mountain elevation).**

Page 3, middle of 3<sup>rd</sup> paragraph: *In the Uinta Basin, the most popular recreation activities are...* **(should this be “in the Ashley National Forest” rather than in the Basin?).**

Page 4 In the list of needs, it emphasizes *improving tribal relationships and partnerships* but does not mention the need to achieve compliance with resource management plans adopted by counties and the State of Utah. The second paragraph on Page 8 does address such non-tribal partnerships but to a lesser degree. **Why is the importance of tribal relationships and partnerships elevated above those with state and local agencies?**

Page 10: Key Elements of the Decision: **should also include a paragraph regarding no suitable Wild and Scenic Rivers being recommended (see Pages 19 and 47).**

Page 14: 5<sup>th</sup> bullet point from top: **Why is tribal traditional ecological knowledge considered important but the TEK of those who have settled and used the forest area since the 1800's is not mentioned?**

Page 15: Visitation figures are based on the NVUMP from 2012. **Is there newer data available? Visitation is reportedly much higher during and post COVID?**

Page 15: 3<sup>rd</sup> bullet point in Economic Resiliency: *livestock grazing, an important economic, cultural, and social use of the forest...*”

Page 17: top paragraph: *...management direction specific to individual parcels of land...management emphasis for that parcel of land...*” **Parcels may not be the correct terminology for areas within the forest.**

Page 24: in the last paragraph, the sentence beginning with “Persistence Analysis” does not

appear to be a complete sentence.

**Page 36 – 47 Compliance with Other Laws and Regulations Executive Order 14008 (Page 38), Executive Order 12898 (Page 40), Executive Order 13751 (Page 41), Executive Order 13186 (Page 42) and Executive Orders 11990 and 11988 (Page 46) are not “laws or regulations.” Why are these EOs considered in this compliance section?**

**Page 47 – Wilderness Act: shouldn’t the ROD elaborate on the wilderness evaluation that was conducted and the result being that no new areas are being recommended for wilderness? Similar findings were included in the WSR section above. Perhaps some of the findings from Pages 17-18 should be incorporated here?**