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July 3, 2024

Submitted via electronic mail: [Ashley National Forest - Home \(usda.gov\)](https://www.usda.gov)

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Vernal, UT 84078

**Subject: Flaming Gorge National Recreation Area Management Plan
Draft Environmental Assessment**

Dear Supervisor Groves and Mr. Buerkle:

The state of Utah (“State”), through the Public Lands Policy Coordinating Office (“PLPCO”), has reviewed the Flaming Gorge National Recreation Area Management Plan and the Draft Environmental Assessment. The State supports Alternative C with a Recreation Emphasis. The State values the U.S. Forest Service’s (“USFS”) efforts in acknowledging the importance of high-quality forest recreation and the need for sustainable recreation opportunities that can be maintained into the future while accommodating growing recreational and traditional demands and recognizing the economic importance of local communities.

The State provided previous comments dated January 10, 2023, and January 12, 2023, and incorporates those comments herein by reference. The State submits the following comments for your consideration.

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I. General Comments

A) State and County Resource Management Plans

The purpose of this portion of the State's comment letter is to bring to the attention of USFS the State's and Daggett County's policies and goals as identified in the [State Resource Management Plan](#) ("SRMP") and [County Resource Management Plans](#) ("CRMPs"). These plans are important because the National Forest Management Act ("NFMA") states, regarding forest plans, that:

*"...the Secretary shall develop, maintain, and, as appropriate, revise land and resource management plans for units of the National Forest System, **coordinated with the land and resource management planning processes of State and local governments and other Federal agencies**" (emphasis added).¹*

Further, the USFS's implementing regulations regarding land use planning, found in the 2012 USFS Planning Rule (found at 36 CFR § 219 *et seq.*) outline in greater detail the coordination requirements imposed on the USFS. The USFS's Planning Rule requires, in part, that:

*"(b) Coordination with other public planning efforts. (1) The responsible official **shall coordinate land management planning with the equivalent and related planning efforts of federally recognized Indian Tribes, Alaska Native Corporations, other Federal agencies, and State and local governments**" (emphasis added).²*

To summarize the Coordination requirement, "Coordination is a process that requires Federal agencies to resolve policy conflicts with State and local plans, policies and programs **for the purpose of reaching consistency**...It recognizes that the responsibilities of State and local governments, to protect the health, safety and welfare of the people, must be harmonized with the Federal position in order to ensure effective governance"(emphasis added).³ Our plans are extensive, however, the topics below are what we find to be critical in the FGNRA draft plan.

i) Livestock and Grazing

Utah's SRMP has the following livestock grazing policies that the State encourages USFS to review:

¹ 16 U.S.C. §1604(a).

² 36 CFR §219(b)(1).

³ American Stewards of Liberty, *Coordination*, American Stewards of Liberty, available at: <https://americanstewards.us/coordination/> (2023).

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- » Support and value the ranching industry as an integral part of Utah’s history, culture, and heritage. Ranching and agriculture are recognized as a cultural resource within the state of Utah.
- » Adopt a stance of not only “no-net-loss” with regard to grazing AUMs/HMs on federal lands, but also a stance that supports the expeditious return of all permitted AUMs/ HMs to active status at the earliest opportunity.⁴

Daggett’s CRMP has the following livestock grazing policies:

1. Management of public lands must maintain and enhance agriculture to retain its contribution to the local economy, customs, culture, and heritage as well as a secure national food supply.
2. The proper management and allocation of forage on public lands is critical to the viability of Daggett County’s agriculture, recreation, and tourism industry.
3. Healthy forests, rangelands, and watersheds are necessary and beneficial for wildlife, livestock, and other multiple-uses.
4. Management programs and initiatives that increase forage for the mutual benefit of the watersheds, livestock operations, and wildlife species should utilize all proven techniques and tools.⁵

The State requests that USFS review these policies to ensure that the draft plan is consistent with them.

ii) Fire Management

The SRMP has the following goals and policies related to fire management:

- » The primary goal of all fire management decisions will be firefighters and public safety. At no time will the preservation of property or natural resources take higher priority than human life safety.
- » Provide initial attack assistance to all lands where cooperative agreements are in place.
- » Manage and pay for wildfires delegated to it by local jurisdictions that have

⁴ SRMP at 105.

⁵ Daggett CRMP at 89.

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cooperative agreements.

- » Provide firefighting resources including hand crews and fire engines for assignment to initial and extended attack wildfires.
- » Pursue outreach and education efforts aimed at preventing wildfires and preparing homeowners/landowners in the eventuality of wildfire.
- » Advocate that local jurisdictions uphold the wildland-urban interface code.
- » Support the Catastrophic Wildfire Reduction Strategy and the National Cohesive Wildfire Fire Strategy.
- » Pursue opportunities to conduct and assist other partners with fuel reduction work including mechanical treatments and prescribed fire.
- » Support the efforts of the Utah Watershed Restoration Initiative, Shared Stewardship Program, and other rehabilitative efforts throughout Utah.
- » Advocate for forest-management practices that promote species diversity and overall ecosystem health.
- » Encourage local jurisdictions to prevent wildfires, prepare their residents for wildfire, and reduce their fuel load by entering into cooperative agreements that give incentive for those actions.
- » Participate with federal wildfire agencies to leverage and combine resources and strengths wherever possible.
- » Support the Watershed Restoration Initiative and Shared Stewardship Program to encourage reduced wildfire acreage and suppression costs, reduced soil loss from erosion, reduced sedimentation and storage loss in reservoirs, improved water quality and yield, improved wildlife populations, increased forage, reduced risk of additional federal listing of species under the Endangered Species Act, improved agricultural production, and resistance to invasive plant species.⁶

Daggett County's RMP has the following objectives and policies:

Objectives

1. Manage forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by society, including ecosystem and community health and resilience. In most cases, fires reach catastrophic levels largely as the result of human intervention, or lack thereof, on the land. Catastrophic wildfires are more intense than natural fires and kill practically all vegetation within the fire perimeter. They can also sterilize soils, resulting in difficult regeneration and depositions of ash and sediments in waterways. Catastrophic wildfires also have a higher probability of threatening private property and public infrastructure, and they can adversely affect public health and safety.

⁶ SRMP at 58.

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2. Seek opportunities to use and harvest forest products that have been affected by wildfire or pests.

Policies

1. When revising or updating a forest plan, the Forest Service should engage with Daggett County in developing alternative management strategies and management policies.

2. Removal of forest products shall be viewed as achievable and sustainable provided that appropriate science and technology are used.

3. Encourage legislation and management that allows for timber removal on a timely basis to increase economic returns as well as to control wildfires.

4. Daggett County would like to pursue an agreement between Daggett County and federal agencies regarding the county's right to be the first responder to wildland fire events within Daggett County.⁷

The State asks that the USFS review these portions of the State's and Daggett County's plans throughout this process and make changes to the draft plan and EA where needed.

iii) Fisheries

The State has the following objectives and policies as it relates to fisheries in its SRMP:

- » Protect, conserve, and improve Utah's fish and aquatic wildlife and the habitats upon which they depend.
- » Provide for the varied demands of fish and aquatic wildlife recreationists.
- » Seek constituent support and participation in fish and aquatic wildlife management programs.
- » Ensure the persistence of the diversity of native fish and aquatic wildlife in Utah, while also providing excellent opportunities for anglers and other recreationists.⁸

Daggett County's RMP has the following policies and objectives:

⁷ Daggett CRMP at 49-50.

⁸ SRMP at 64.

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Objectives

1. Maintain, enhance, and expand sport-fishing opportunities.
2. Protect and preserve water quality and fish habitat while balancing the needs of other water users, including those holding water rights.
3. Enhance public access to fishing opportunities.
4. Support all measures designed to prevent the spread of invasive species or diseases that negatively affect fish populations.
5. Support economic development associated with fishing, including private businesses and facilities.

Policies

1. Support and encourage public land-management agencies to provide and maintain sufficient opportunities for fishing on public lands.
2. Support the UDWR's efforts to work with landowners to voluntarily acquire public fishing access through the Walk-in-Access program.
3. Support the UDWR's efforts to educate the recreating public about preventing the spread of AIS and diseases that affect aquatic species.
4. Support efforts to protect water quality and the quality of the associated fisheries.
5. Support efforts to improve fish habitats while balancing the rights of adjacent landowners and holders of water rights.
6. Coordinate and communicate with the UDWR to ensure that public fishing opportunities are maintained and enhanced, including appropriate stocking levels.
7. Support tourism and associated businesses and commercial enterprises that are supported by local fisheries, such as destination resorts and guide services.

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8. Promote land uses that are compatible with maintaining healthy fisheries on lands adjacent to fish-bearing streams, lakes, and reservoirs.⁹

Please adhere to these policies and objectives and make any necessary changes to the draft plan accordingly.

iv) Forest Management

The SRMP provides, in part, the following policies and goals that the State of Utah has relating to forest management:

- » Support the sustainable removal of conifers to promote the establishment of aspen and attendant grass, forbs, and shrubs where appropriate.
- » Encourage timber harvesting to prevent fuel load and biomass buildup.
- » The State encourages Agencies to adopt policies that promote and facilitate early detection and control of insect and disease outbreaks using biological, cultural, and chemical methods.
- » Encourage prompt removal and salvage of drought, fire, and beetle-killed timber and reseed or replant as appropriate to maintain healthy forests and watersheds.
- » Support the use of all appropriate silvicultural methods to reduce the risk of damage due to insects, disease, and fire.
- » Use trees of the best genetic quality when replanting a site.
- » Monitor and control invasive species, particularly in riparian corridors.
- » Encourage agencies to adopt and maintain scientifically sound forest management policies based on current, high-quality data to pursue multiple use of public forest resources to provide sustainable yield of timber, forage, firewood, wildlife, fisheries, recreation, and water.
- » Identify and target private forest landowners located in important forest resource areas for assistance with planning.
- » Develop Forest Stewardship Plans in accordance to FFSL standards for private forest landowners who demonstrate their commitment to proactive management.
- » Encourage and promote cooperation by other land management agencies (state, private and federal,) employing ecosystem management, forest health, and stewardship principles.
- » Develop partnerships and cooperative relationships with organizations that share goals of forest management.
- » Develop and present workshops for private landowners.
- » Design and implement demonstration areas.

⁹ Daggett CRMP at 53.

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- » Promote job-related training and educational opportunities.
- » Educate loggers and other contractors on the Forest Water Quality Guidelines.
- » Support the management of timberlands suitable for commercial harvest for timber or wood-fiber production.
- » Support the management of forestlands not suitable for commercial harvest to maintain forest-cover species with emphasis on production of other forest resources and uses.
- » Support the management of non-commercial aspen stands in mixed-age groups to provide forage.
- » Support the use of commercial sales of timber and forest products and thinning to control stocking where opportunities exist.
- » Support harvest of forest products when the activity would improve water production and/or does not adversely affect water quality.
- » Where feasible, encourage the harvest of forest products in areas of proposed or existing vegetation treatments to offset costs of treatments and reduce the need for additional site entries.
- » Support planting new trees to provide desired cover where natural regeneration is insufficient.
- » Support the use of mechanical removal, chemical removal, or fire to alter or perpetuate forests and increase herbaceous yield where timber harvest is impractical, or demand does not exist.
- » Understand current and emerging enabling technologies for wood processing.
- » Develop an inventory of possible large, medium, and small business possibilities that could utilize small-diameter wood.
- » Conduct an initial industry viability assessment based on analyzing a variety of business configuration scenarios.
- » Provide an initial assessment report and presentation.
- » Support federal partnerships with industry to create scalable projects to provide certainty in the supply of timber.
- » Support the re-establishment of a viable wood-fiber industry.
- » Support the use of the timber industry to sequester carbon through the harvest of wood products.¹⁰

Daggett's CRMP provides the following relevant goals and objectives as it relates to forest management:

¹⁰ SRMP at 76-77.

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Objectives

1. Use active and adaptive forest management to improve forest health in Daggett County and support multiple use and sustained yield with emphasis on employment, forest products, open space, wildlife habitat, forage, recreation, and other social and economic benefits.
2. Manage Daggett County's forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by Daggett County, including ecosystem and community health and resilience.
3. Encourage and support the expansion of the Daggett County forest-product market at sustainable harvest levels.
4. Develop new markets for timber and forestry products that are available for harvest within Daggett County (e.g., use timber products for bracing in nearby coal mines or the biofuels industry).
5. When sustainable and based on scientific knowledge and local data, increase Daggett County grazing to historic levels (allotments, animal unit months [AUMs], or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.
6. Manage Daggett County's forest watersheds for optimal yield without compromising other resources.
7. Seek opportunities in Daggett County to use and harvest forest products that have been affected by wildfire or pests (e.g., pine beetles).
8. Reduce time required for NEPA processes associated with timber harvests within Daggett County so that economic benefits can be maximized.

Policies

1. Manage all Daggett County forested lands for sustained yield, multiple use, and forest health.
2. Manage fire, timber harvesting, and treatment programs to prevent waste of forest products.

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3. Provide for fuel load management and fire control in Daggett County to prevent catastrophic events and reduce fire potential at the urban and industrial interface.

4. Design Daggett County management and harvest programs to provide opportunities for local citizens and small businesses.

5. Protect Daggett County timber resources and promote the continuation of a sustainable wood products industry.

6. Promote sale sizes that provide opportunities in Daggett County for a wide spectrum of producers and allow for local entrepreneurship.

7. Promote commercial firewood harvesting to help in fuel-load management and fire control. Encourage the Forest Service to open appropriate areas for commercial timber harvest.

8. Participate in the planning for and revision of Forest Service management plans and BLM resource management plans affecting forest management. When revising or updating a forest plan, the Forest Service should engage with Daggett County in developing alternative management strategies and management policies.

9. Encourage the Forest Service to find commercial uses for timber and forest products within Daggett County that have been affected by wildfires or pests.

10. Collect and provide data to the Forest Service regarding appropriate forest management methodologies in Daggett County. Data may include published scientific literature, local case studies, inventories, or other pertinent information.

11. additionally, areas for timber and non-timber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.

12. Removal of forest products shall be viewed as achievable and sustainable, provided that appropriate science and technology are used.

13. Require management programs to provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health in Daggett County. Sound economic approaches, considering both long- and short-term goals, shall be used when

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considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.

14. Require forest management plans to be written in which effective management techniques are adopted to promote a stable forest economy and enhanced forest health in Daggett County, in accordance with the National Healthy Forest Initiative.

15. Grazing on national forest lands within Daggett County should be tied to historic levels and healthy forest conditions. AUMs should be maintained; vacant allotments should be actively restocked.¹¹

The State recommends USFS consider these policies throughout the remainder of the planning process and make changes to the draft plan where necessary to ensure a plan that is consistent with state and county goals and policies.

v) Land Access

The State has the following relevant goals and policies listed in its SRMP as it relates to public land access:

Objectives:

1. Protect traditional and cultural access to public lands.
5. Encourage regular review of existing roadway infrastructure, planning documents, and policies to address future needs.
6. Maintain road systems for safe, convenient, and equitable access for citizens of all ages and physical conditions.
7. Provide and protect access for utility and communication providers.
8. Oppose new roadless areas and similar designations that limit access.
12. Encourage the provision of additional road infrastructure to accommodate safe and enjoyable outdoor recreation practices on public lands.

¹¹ Daggett CRMP at 58-59.

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13. Expedite the National Environmental Policy Act (NEPA) and policy process to avoid, minimize, or mitigate access limitations on public lands.

14. Ensure access to emergency responders for fires, medical incidents, search and rescue, and similar efforts.

15. Ensure access to forestry, mineral, energy, and other needed resources for state and national security and for economic prosperity.

16. Ensure access for forest management and stewardship projects.

Policies:

- » Supports the protection of traditional and cultural access to public lands.
- » Encourage regular review of existing access infrastructure and future needs in an effort to maintain transportation systems for safe and convenient access.
- » Keep roads open for utility and communications companies to ensure reliable delivery of services to citizens of Utah and allow for the maintenance of current and future infrastructure, including but not limited to transmission and distribution lines, pipelines, and communications towers.
- » Opposes any additional evaluation of Forest Service land, or other federally managed lands, as “roadless” or “un-roaded” beyond the Forest Service’s second roadless-area review evaluation (RARE2) and oppose efforts by agencies to specially manage those areas in a way that:
 - » closes or declassifies existing roads without the coordination and consent of the local government;
 - » permanently bars travel on existing roads; » excludes or diminishes traditional, multiple-use activities, including grazing, proper forest harvesting, hunting, fishing, and vegetation management;
 - » interferes with the enjoyment and use of valid, existing rights, including water rights, local transportation plan rights, RS 2477 rights-of-way, grazing allotment rights, and mineral leasing rights; or,
 - » prohibits the development of additional roads reasonably necessary to pursue traditional multiple-use activities.
- » Encourage the Forest Service to review and amend its roadless rule to allow for additional access to reduce fuel loads and to improve water quality and quantity, wildlife habitat, species diversity, and forest ecosystem health.
- » Maintain access to roads that provide access to and across public lands managed by any land management agency unless concurrence on the closure of unnecessary or

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unsafe roads can be met through cooperation and coordination with the state and the counties within which the roads in question are located.

» Maintain access to lands managed by the State of Utah and establish new roads where access to state lands is currently not available.

» Consider, evaluate, and analyze access and transportation needs during land-use planning processes. No roads, trails, rights-of-way, easements, or other traditional access for the transportation of people, products, recreation, energy, or livestock may be closed, abandoned, withdrawn, or have a change of use without full public disclosure, analysis, and coordination with state and county plans and personnel.

» Maintain access to all water-related facilities such as dams, reservoirs, delivery systems, monitoring facilities, livestock water, handling facilities, etc. Ensure that this access is economically feasible with respect to the method and timing of such access.

» Support the supposition that each county should determine what roads to which they have a right-of-way, as stated in Utah code 72-5-104, which dedicates public rights-of-way on certain roads on private land. Encourage Utah counties to inventory roads that have been traditionally used for public access to public lands and make needed amendments to local plans to establish authority and enforcement protocols. Federal agencies should abide by state code and shall respect county decisions regarding dedicated easements.

» Maintain access provided by Utah code 72-5-104 as essential for landowners to access private property and for the public to access and use public lands.

» Maintain accessibility to state and federal lands and amenities via multiple modes of transportation, inclusive to persons with disabilities, and in accordance with relevant accessibility guidelines to the extent possible.

» Supports and assists in obtaining and maintaining access to public lands to facilitate vegetation management and wildlife habitat projects implemented by the Shared Stewardship, Watershed Restoration Initiative, or other similar programs.

» Identify individual roads of significant importance and address associated concerns regarding those roads with federal and county stakeholders during the management-planning process, rather than deferring conversations to later dates.

» Support administrative access for all valid permit holders.

» Support increasing access to, and provide infrastructure for, outdoor recreational activities on public lands.

» Oppose pauses or moratoriums that limit access to public lands for multiple-use, sustainable yield, historic, cultural, and traditional practices.

» Support and encourage an expedited NEPA process and policy decisions.

» Support the use of Class 1 and Class 2 electric-assist bicycles wherever mountain bike use is permitted to provide equity in access to federal lands for citizens of all age groups and physical abilities.

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The State recommends the USFS take these provisions into account throughout the planning process and make changes where needed to ensure proper coordination and consistency with the FGNRA draft plan.

vi) Minerals

The State has the following policy that is relevant to mining on USFS lands:

» Support responsible and environmentally conscious mining for mineral resources on lands managed by the State of Utah, BLM, and Forest Service.¹²

Daggett's CRMP has the objective to:

Continue to allow access and increase access to public lands in Daggett County for mining and mineral resource development in a manner that:

1. satisfies local and national needs and provides for economical and environmentally sound exploration, extraction, and reclamation practices; and

2. is consistent with, and complementary to, Daggett County's lifestyle, character, and economy.¹³

The State discusses one issue related to mining in its Specific Comments section below. The State asks USFS to consider the State's interests on this matter throughout the remainder of the planning process.

vii) Outdoor Recreation and Tourism

Utah has the following two policies related to outdoor recreation and tourism on public lands:

» Encourage input from key stakeholders on matters related to outdoor recreation, tourism, and public land management.¹⁴

» Plan for the future of Utah's recreation and tourism with a long-term outlook.

¹² SRMP at 114.

¹³ Daggett CRMP at 101.

¹⁴ SRMP at 149.

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Daggett's CRMP has the following policies and objectives for outdoor recreation and tourism that are noteworthy:

Objectives

1. Support outdoor recreation as part of a balanced plan of economic growth and quality of life.
2. Leverage federal and state recreation areas, parks, and sites as county-based scenic and recreation economic assets.
3. Coordinate Uintah Basin Association of Governments and county recreation economic development efforts and activities with other state, local, and private interests (e.g., destination resorts and private facilities).
4. Cultivate recreation and tourism facility development and maintenance of "partnerships" with agencies and special interest groups.
5. Identify and preserve locally important recreation resources for future generations.
6. Support active management of conflicting recreational uses so that multiple users (e.g., motorized and non-motorized user groups) are accommodated to the greatest extent practicable.

Policies

1. Daggett County has outstanding potential for further development of recreation and tourism.
2. Resource development, recreation, and tourism are compatible when properly managed.
3. Motorized, human, and animal-powered outdoor recreation in Daggett County should be integrated into a fair and balanced allocation of resources within the historical and cultural framework of multiple-uses in rural Utah, and outdoor recreation should be supported as part of a balanced plan of state and local economic support and growth;

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4. Potential developments in Daggett County should include family-oriented activities and developments that are accessible to the general public and not limited to special interest groups.

5. Daggett County supports cultivating recreational facility development and maintenance partnerships with other entities, agencies, and special interest groups.

6. The BLM or Forest Service must coordinate and closely consult with Daggett County and municipal governments who are conducting inventories related to recreation resources and opportunities or scenic values, and these inventories should reflect a consensus among those governmental agencies.

7. Public land agencies must evaluate proposed plans and actions for impacts on existing recreational resources in Daggett County and activities and potential future activities. This should be coordinated with county and municipal governments.

8. Plan and manage recreational activities to be compatible with resource development in Daggett County. Resource development, recreation, and tourism are compatible when properly managed.

9. Management plans and decisions in Daggett County must provide opportunities to meet the increased demand for dispersed and developed recreational opportunities.

10. Daggett County land-use plans and regulations will support expanding recreation opportunities and the protection and enhancement of traditional recreation areas and sites.

11. The BLM or Forest Service must coordinate and consult closely with Daggett County and municipal governments on any proposals for special designations (Special Recreation Management Areas, wilderness, etc.) that may affect current and future recreation use.

12. During land-use planning processes, Daggett County will identify potential locations of desired recreational facilities.

13. When possible, Daggett County development proposals will be sensitive to county outdoor recreation, scenic quality, and open space preservation objectives.

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14. Daggett County identified public recreation areas and lands with unique natural features may be preserved through easements or other common open space preservation strategies.

15. Federal and state land management should support recreation and tourism and associated businesses in Daggett County, including the broad range of activities from off-road vehicle use to primitive outdoor adventures.

16. Encourage private sector development of recreational facilities and services in Daggett County using development incentives or other feasible tools as appropriate and in coordination with county commissioners and city councils.

17. Cultivate recreation facilities and services in Daggett County (e.g., dinosaur trails system) development and maintenance “partnerships” with other entities, agencies, and special interest groups as appropriate and in coordination with county commissioners, city councils, and recreation special service district boards.

18. Permitting commercial business enterprises or concessions on federal lands that reflect the custom and culture of Daggett County in terms of recreation and outdoor lifestyles and uses should be encouraged.

19. Management decisions should provide for the continuation or expansion of outfitting and lodge operations. They are an important part of local history and tradition, and they contribute substantially to the local economies.

20. Encourage recreation-oriented economic development activities that are consistent with Daggett County’s character and lifestyle.

21. Permit or lease terms and conditions (e.g., grazing permits) must allow OHV access and use for needed and legitimate purposes to enter a specific area on public lands.

22. In accordance with Utah Code 63J-8-104(g), federal land management agencies shall achieve and maintain traditional access to outdoor recreational opportunities available on federal lands as follows:

- Hunting, trapping, fishing, hiking, camping, rock hounding, OHV travel, geological exploring, pioneering, recreational vehicle camping, and sightseeing are activities that are important to the traditions, customs, and character of Daggett County and should be allowed to continue.

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- Wildlife hunting, trapping, and fishing should continue at levels determined by the Utah Wildlife Board and the UDWR. Traditional levels of group camping, group day use, and other traditional forms of outdoor recreation, both motorized and non-motorized, should be allowed to continue.

- The broad spectrum of outdoor recreational activities available on the subject lands should be available to citizens for whom a primitive, non-motorized, outdoor experience is not preferred, affordable, or physically achievable.

23. Federal land outdoor recreational access in Daggett County should not discriminate in favor of one particular mode of recreation to the exclusion of others.

24. Recreation resource protection and management in Daggett County must provide for continued and reasonable access to and development of property rights within the area and provide for full use and enjoyment of these rights.

25. Existing levels of motorized public access to traditional outdoor recreational designations in Daggett County must be continued, including both snow machine and OHV use.

26. OHV use in Daggett County should be limited to trails, roads, or areas specifically designated by the agency for that purpose. However, the availability and overall mileage of such trails should be expanded to meet demand. OHV loops should be provided to connect communities within the region. Open area riding as well as looped and stacked trail systems should be offered, with a variety of levels of trail difficulty.

27. Group camping and day-use sites and availability in Daggett County must be continued and expanded to meet demand.¹⁵

The State asks that the USFS utilize these plan provisions going forward in the planning process and revise the draft plan where needed.

viii) Utility Corridors

Utah's SRMP has the following policies listed as they relate to utility corridors:

- » Support the development of utility corridors to accommodate pipelines from the natural gas and crude oil producing areas to refineries, export facilities, or to other transportation networks.

- » Federal agencies shall recognize and aid utilities in implementing wildland fire protection plans required of qualified utilities under Title 54-24-201 of the Utah Code.

¹⁵ Daggett CRMP at 116-118.

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» Interstate transmission lines should provide access for utilization of energy by citizens of the state of Utah or supply significant and continual incentives that benefit the citizens of the state.

» Utility corridors are needed in the state of Utah to maintain affordable, reliable, abundant, and dispatchable energy at all times.¹⁶

Daggett County's RMP has the following policies that are relevant to the FGNRA draft plan:

4. Daggett County supports the development of utility corridors to accommodate pipelines from the natural gas and crude oil producing areas to refineries, export facilities or other transportation networks.

5. Federal agencies shall recognize and aid utilities in implementing wildland fire protection plans required of qualified utilities under Title 54-24-201 of the Utah Code.

6. Interstate transmission lines should provide access for utilization of energy by citizens of Daggett County, the state of Utah, or supply significant and continual incentives that benefit the citizens of the county and state.

7. Utility corridors are needed in Daggett County and the state of Utah to maintain affordable, reliable, abundant, and dispatchable energy at all times.¹⁷

Because the FGNRA is a Section 368 Corridor, we ask that USFS give these provisions special consideration and modify the draft plan if needed.

ix) Water Rights and Water Quality

Utah's SRMP has the following goals, objectives, and policies relating to water rights:

» Develop and use Utah's entitlement to interstate rivers for the benefit of all citizens. All water rights desired by the federal government must be obtained through the state water appropriation system.

» Recognize Utah's water laws of prior appropriation doctrine and beneficial use as the legal basis for perfecting all water rights for the use of all water within the state.

» Oppose federal agencies conditioning any permit, lease, or other land-use agreement on the permanent transfer, relinquishment, or other impairment of any water right.

¹⁶ SRMP at 164.

¹⁷ Daggett CRMP at 131.

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- » Support voluntary projects that improve water quality and quantity and those that increase the dependability of the water supply.
- » Ensure any recovery plan, habitat management plan, critical habitat designation, or any other plan proposing an “in-stream flow” requirement adequately considers local existing and anticipated future water uses, local custom and culture, and local economic and individual needs and follows Utah Code Ann. §73-3-30.
- » Consider additional water-storage facilities in Utah that ensure present and future growth and protection of Utah Water Rights under the Colorado River Compact.
- » Prioritize locally led efforts to monitor and improve water quality and (where feasible) complete them in conjunction with existing state and federal agencies with the same mandate.
- » Use the Utah Constitution and Utah statutes as the legal basis for the acquisition of water rights and water use in the state, including the right to divert unappropriated waters.
- » Protect privately held water rights from encroachment and/or coerced acquisition.
- » Land-use improvements and practices that promote healthy drainages and watersheds should be implemented.¹⁸

Daggett County has the following policy relating to water resource management: “Management and resource-use decisions by federal land management and regulatory agencies concerning the vegetative resources within the state should reflect serious consideration of the proper optimization of the yield of water within the watersheds of Daggett County.”¹⁹

The State also has the following goals, policies, and objectives relating to water quality:

- » Develop cooperative and/or complementary water-quality monitoring systems for water quality assessments and determination of TMDLs, share technical expertise, and promote research on water-quality management practices.
- » Coordinate water-quality monitoring activities and cooperate in the collection, analysis, and processing of water-quality samples when the efforts are mutually beneficial to federal land-management agencies and the State of Utah.
- » Develop and implement best management practices (BMPs) for activities and uses of forest and rangelands with intent to meet state water quality standards.
- » Annually review selected projects for BMP implementation and effectiveness. A review team will include representatives from the DWQ, UDAF, FFSL, and relevant

¹⁸ SRMP at 166-167.

¹⁹ Daggett CRMP at 137.

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federal land-management agencies.

» Cooperate across administrative boundaries to maintain or improve water quality where possible. Cooperative efforts include sharing data and collaborating on project planning and implementation efforts.²⁰

The State recommends the USFS consider these policies as it strives to coordinate, consult, and cooperate with the State and Daggett County on this land use plan.

x) Wildlife

The State has the following goals, policies, and objectives listed in our SRMP:

- » Expand wildlife populations and conserve species of greatest conservation need by protecting and improving wildlife habitat.
- » Manage current populations or establish new populations of wildlife in suitable habitats in Utah, as outlined in approved management plans.
- » Improve the quality and quantity of vegetation for mule deer on a minimum of 500,000 acres of crucial range by 2024.
- » Provide a diversity of high-quality hunting and viewing opportunities for wildlife species throughout Utah.
- » Manage fish and game populations to meet management-plan objectives, and expand quality fishing and hunting opportunities throughout Utah.
- » Manage species in need of conservation to prevent listing under the Endangered Species Act of 1973.
- » Every effort should be rendered to keep management of species at the state level.
- » Work with constituencies to achieve broad-based support for wildlife programs within the state by demonstrating the value of wildlife to all citizens of Utah.
- » Increase public awareness in Utah of wildlife as a “quality-of-life” issue to expand the issue’s support base and achieve stable funding.
- » Improve communications with wildlife organizations, public officials, private landowners, and government agencies to obtain support for wildlife in Utah.
- » Expand programs to recruit and retain Utah’s young hunters, anglers, and wildlife watchers.
- » Produce and maintain the desired vegetation for wildlife and domestic livestock forage on public and private lands throughout Utah.
- » Avoid, mitigate, minimize, or compensate for damages to private land occurring when Utah’s wildlife populations are above targeted management-plan objectives.
- » Work with landowners, the federal government, and private organizations to

²⁰ SRMP at 172.

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conserve valuable wildlife habitat in Utah and winter range along the wildland-urban interface.

- » Minimize negative impacts from wildlife on private lands in Utah.
- » Work with local governments and federal agencies to identify and conserve crucial wildlife habitat and migration corridors throughout Utah.
- » Utilize the best available science and wildlife management techniques to manage wildlife populations throughout Utah.
- » Work with universities and constituency groups to study and better understand wildlife populations throughout the State.
- » Develop mechanisms and policies to incentivize private landowners throughout Utah to conserve valuable wildlife habitat.²¹

Daggett County has the following policies, goals, and objectives relating to wildlife management:

Objectives

1. Maintain healthy populations of mule deer while minimizing negative impacts from winter migration, including vehicle collisions and residential and commercial vegetation damage.
2. Avoid damage caused by wild horses by preventing the introduction of wild horse populations.
3. Support energy development while minimizing loss or fragmentation of habitats and disturbance during sensitive periods.
4. Meet municipal and industrial water needs while preserving traditional agricultural uses and ensuring aquatic habitat to support wildlife.

Policies

1. Enact decisions and policies under the presumption that, with proper management and planning, healthy wildlife populations within Daggett County are not incompatible with other resource development.

²¹ SRMP at 188-189.

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2. Enact decisions and policies under the presumption that properly managed wildlife populations are important to Daggett County's recreation and tourism economy and the preservation of the culture and lifestyles of its residents.

3. Control predator and wildlife numbers within Daggett County at levels that protect livestock and other private property from loss or damage and prevent the decline of other wildlife species populations.

6. Wildlife habitat must comply with Utah Healthy Rangeland Standards. Wildlife populations must be reduced when it has been determined that wildlife is responsible for habitat degradation.

7. Enact decisions and policies under the presumption that the impacts of development can be mitigated more efficiently in a planned manner through wildlife habitat mitigation banking. When implemented, this system could provide much-needed habitat for wildlife while providing for multiple use.

10. Enact decisions and policies in which reductions in forage allocation, resulting from forage studies, drought, or other natural disasters, are shared proportionately by wildlife.

11. Enact decisions and policies in which wildlife target levels and/or populations in Daggett County do not exceed the forage available as determined by proper monitoring.

13. Call upon wildlife management agencies and public land management agencies to work together with Daggett County to manage and conserve big-game populations and their habitats, identify their migration corridors, and seek to remove barriers along those corridors in a manner that respects private property rights.

16. Reduction in forage allocation within Daggett County resulting from forage studies, drought, or other natural disasters will be shared proportionately by wildlife, livestock, and other uses.

17. Increases in forage allocation resulting from improved range conditions within Daggett County shall be shared proportionally by wildlife, livestock, and other uses.

18. Wildlife populations shall be consistent with the forage assigned in the resource management plan forage allocations within Daggett County.

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19. Livestock, private property, and wildlife habitat within Daggett County will be protected by controlling predator and wildlife numbers.²²

B) Possible Ski Resort Implications

The State appreciates the USFS' efforts to provide a multiple use friendly plan. It is important to highlight that Daggett County and other parties are in the process of getting an application together for a proposed ski resort near Greendale Junction. The State asks that the USFS communicate with Daggett County so that conflicts may be avoided between the County's goals and this planning effort.

C) The FGNRA is a Critical Corridor for Utilities

The FGNRA planning area is a critical planning areas in Utah. This is largely because it is the only area in the Uinta Mountain region where utilities can be sited for hundreds of miles. For this reason, in 2005 Congress designated portions of the FGNRA as a Section 368 Corridor as part of the Energy Policy Act of 2005. This is critical for the State of Utah and our citizenry because it provides energy pipeline and electricity transmission capabilities that make Utah's energy secure. Any provision in the draft plan that may be contrary to the purpose of the Section 368 Corridor should be amended or removed prior to the finalization of the plan.

The State asks the USFS to adhere to these policies, goals, and objectives throughout the planning process.

Utah Division of Wildlife Resources

Draft Recreation Management Plan

Although there is mention of general invasive species control and needed effort to control halogeten and cheatgrass, there is no specific mention of invasive tamarisk or Russian olive. The Division of Wildlife Resources ("DWR") suggests evaluating the inclusion of a Desired Condition or Goal that will address these two species. They are becoming dense on some shores of the FGNRA and are increasing in numbers along the Green River. Controlling these species can help to increase soil quality and overall rangeland health. Downstream of the FGNRA, multiple projects have been implemented to reduce the populations of these species. By reducing these species in the FGNRA, the downstream populations of these invasive species will likely be reduced.

²² Daggett CRMP at 169-170.

Recreation and Facilities, Goal 3

DWR suggests adding options for increasing capacity and distributing demand/use at the Little Hole ramp and the Spillway launch ramp to better accommodate outdoor enthusiasts and anglers.

DWR also suggests including a goal to initiate a recreation capacity study for the Green River below the Flaming Gorge dam. In recent years, visitation to the Green River has increased, impacting the quality of recreation on the Green River and the species that rely on it for habitat. Understanding the impacts of increased recreation on aquatic species in the area is a critical step to understanding how we can best manage this fishery for the benefit of outdoor enthusiasts and the local aquatic wildlife.

Fish and Wildlife, Table 4

DWR suggests adding bluehead sucker and flannelmouth sucker to the list of species found in the FGNRA. These two species are found within the boundary of the FGNRA. They are managed under a conservation agreement to prevent federal listing, in addition to being species of Greatest Conservation Need in Utah. DWR suggests adding lake trout, smallmouth bass, mountain whitefish, kokanee salmon, and boreal toad, which are all found within the FGNRA

Draft Environmental Assessment

Fish and Wildlife, Affected Environment

DWR suggests adding bluehead sucker and flannelmouth sucker to the list of species found in the FGNRA. These two species are found within the boundary of the FGNRA. They are managed under a conservation agreement to prevent federal listing, in addition to being species of Greatest Conservation Need in Utah. We also suggest adding lake trout, smallmouth bass, mountain whitefish, kokanee salmon, and boreal toad, which are all found within the FGNRA.

Table 2-1 Alternatives Matrix, Public Safety, GO-01

The Utah Department of Natural Resources (“DNR”)/DWR is absent from the table listing agencies to be coordinated with under Alternatives B and C. DWR recommends including DNR/DWR as a coordinating agency, as Conservation Officers have the authority to enforce Utah wildlife law within the FGNRA.

If you have wildlife resource questions during project development, please contact Tom Platero, Habitat Biologist in DWR’s Northeast Region Office in Vernal, Utah, at 435-219-3557.

Utah Division of Forestry, Fire & State Lands

The Utah Division of Forestry, Fire, & State Lands (“FFSL”) urges USFS to coordinate with FFSL on the management of wildland fire, forests, and state lands.

II) Specific Comments on the Draft Plan

Utah Division of Forestry, Fire and State Lands

Appendix B Implementation Guidance presents Management Approaches by topic for Fire and Fuels that are not previously discussed in the Plan. Under Fire and Fuels on lines 23 and 24, “New and existing forest system routes may function as fuel breaks where appropriate to the location and vegetation type.” However, this concept was not discussed in the plan previously or stated how it would be implemented under the different alternatives. It is not apparent whether or not this management approach be included for Alternatives B and C.

On page 40 it is unclear whether or not the desired condition “under which disturbed areas would be managed for the spread of cheatgrass (*Bromus tectorum*), halogeton (*Halogeton* spp.), and other invasive species throughout the FGNRA. Ground disturbances in and next to plant communities that are susceptible to or are affected by invasive plants would be seeded within 1 year following disturbance.” this would also be a desired condition under Alternative C. On page 10 in Table 2-1. Alternatives Matrix indicates that Alternative C would be the same as Alternative D for this desired condition, but it is not included in the narrative on page 40 for Alternative C. USFS should clarify Alternative C’s narrative if it would be the same as Alternative D for this desired condition.

Additional specific State comments:

On the title page; Susan Eickhoff is listed as the Forest Supervisor. Kristy Groves is the current Acting Forest Supervisor.

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Page iii: In the list of abbreviations, it would be appropriate to add:

GRA (General Resource Areas) see Table 7, Page 18.

LMP (Land Management Plan) see Page 1, Line 20.

LTA (Land Type Association) see Table 18, Page 39

REA (Recreation Enhancement Act) see Page 25, Line 22

Page 3, Line 40 mentions two management challenges, “the first challenge stems from the need to maintain and expand recreation opportunities around the reservoir to support local economies.” The second management challenge is unclear but may appear on Page 4 and be associated with unmanaged recreation and the impacts on fragile ecosystems.

Page 5, Table 1. “Rock Shelter,” “Basket,” and “Corn Storage Feature” are not column headings and thus should not be bolded.

Page 6, Figure 1. This and many of the other Figures in the plan have overlapping text where the data source and the map scale appear. Also, the figures show a gray-shaded area south of the FGNRA that is not identified in the legend.

Page 9, Lines 1& 2: “...October 1, 1968, when Congress formally created the FGNRA, designated management to the Secretary of ~~the~~ Agriculture, and delegated administration to the Forest Service.”

Page 9, Table 2. “Road,” “Visitor Center,” and “Sawmill” are not column headings and thus should not be bolded.

Page 11, Line 17 omits the presence of fiber optic lines in the FGNRA.

Page 11, Line 18 needs the correct Section reference for fuels and vegetation.

Page 11 of the draft plan, the USFS states that several of the listed species are known to be in the FGNRA. On page 12 they state that the Eureka Mountain Snail is a species of conservation concern. However, a quick search on the Utah Division of Wildlife Resources website does not indicate that they are in the FGNRA.²³ USFS should not list a species as that of conservation concern if they have not been found in the NRA.

²³ <https://fieldguide.wildlife.utah.gov/?species=oreohelix%20eurekensis>

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Page 18, Table 7 establishes 2,840 acres of “General Resource Areas;” however, Figure 5 on Page 19 appears to show the location of these areas being south of the FGNRA boundaries. Amend Figure 5 to clearly show the location of these GRAs.

Page 20, Line 29: The recreation activity “camping” is duplicated.

Page 24, Table 9. Why are the Xs in the Well Column for Firehole Canyon and the Spring Column for Ross Spring italicized while the others are not?

Page 25, Line 2: “The Flaming Gorge Ranger District provides opportunities for a variety of recreation special uses.” Is it the Ranger District that provides these opportunities or is it the FGNRA that provides them?

Page 25, Lines 17 & 18: The term “vendor” seems appropriate here, but the term “peddler” does not as these vendors are not selling these services door to door.

Page 26, Lines 9 & 10: “At least 95% of fee receipts ~~the fees~~ collected in a national forest or unit must remain there.”

Page 26, Lines 9-15: This may be a good place to discuss the maintenance backlog on the FGNRA. Lack of funding to meet future recreation demand is a major challenge referred to on Page 3. Lack of funding was a major issue brought up during the 2022 field tours; especially by concessionaires.

Pages 25-27 of the draft plan, the USFS outlines its current recreational framework for the FGNRA. Daggett County, the Seven County Infrastructure Coalition, and private parties are currently in the process of applying for a ski resort permit near Greendale Junction, just outside of the FGNRA boundaries. Would it be proper for the USFS to mention this and other winter recreational opportunities (such as snowmobiling)?

Page 26, Lines 23 & 24: Paddle boarding is left off the list of water-based recreation opportunities, yet the plan calls for paddle board trails.

Page 26, Lines 33-38: This may be a good place to mention the issue of shore launching of watercraft and how that needs to be controlled to prevent resource damage and the spread of invasive species such as the quagga mussel.

Page 27, Lines 8-10: “Motorized dispersed camping is allowed only within 150 feet of designated roads and trails and is limited to designated sections that are shown on the

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Motorized Vehicle Use Map where significant impact to other resources is not likely to occur.”

Page 27, Table 11. While this table gives the mileage of designated roads and trails, the plan needs a Figure to show the locations of these designated routes. This figure could be adapted from the Motorized Vehicle Use Map.

Page 28, Lines 1-11: A description of non-motorized routes is given here, but the plan needs a Figure to show the locations of these designated nonmotorized routes.

Page 28, Lines 14 & 15: “Scenic backways are state-designated routes that are less-developed rugged routes, often on National Forest System roads.”

Page 28, Lines 26-30: There was additional analysis of Wild and Scenic Rivers done during the recent Forest Plan update that should be included here; especially if any of the creeks found eligible or suitable are located within the FGNRA.

Page 33, Lines 2 & 3: “Conservation and management of scenic resources is outlined in the ~~2023~~ 2024 Ashley National Forest revised forest plan.” This change would be consistent with Page 1, Line 20.

Page 33, Table 13, indicates that 47 acres of land are not applicable to the Scenic Integrity Objectives for the FGNRA. However, Figure 8 on Page 34 does not clearly indicate where these 47 acres are located.

Page 36, Lines 7-9: “The FGNRA contains three major withdrawals: a mineral withdrawal, BOR Colorado River Storage project withdrawal, and a power site classification withdrawal on the Green River below Flaming Gorge Dam.”

Page 37, Table 17: “Nonvegetation – Areas ~~of~~ devoid of vegetative cover.”

Page 38, Figure 9: This figure contains terms such as “PEAC3” and “ERUN” but there is no indication in the legend what these terms mean.

Page 39 of the draft plan, the USFS lists special status plant species in the FGNRA. The first one listed is the Ute ladies' tresses. The State has been informed that this species is scheduled to be delisted this FY 2024. Perhaps the final plan could have an alternative management strategy if this species is delisted so that cumbersome management protocols do not have to be adhered to in the event of a delisting. The wording in Table 18 should be amended as follows: “They ~~are known from~~ have been observed below the National Forest

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boundary along the Green, Yellowstone, Uinta, Lake Fork, and Rock Creek Rivers (**which are outside of the FGNRA plan area**).

Page 43, Figure 10: This figure contains black and gray lines that appear to be roads, but the legend does not provide verification.

Page 44 states “Operation of the dam, its infrastructure, and the Reservoir below high pool are the jurisdiction of the BOR.” Does the USFS not manage the land where it is below high pool? Who approves extensions of boat ramps during extended droughts and manages shoreline recreation?

Page 44, Lines 22-24: “Major perennial tributaries include the Green River, Black’s Fork River, and Henry’s Fork River. Other perennial streams include Sheep Creek, Carter Creek, Eagle Creek, Cart Creek, Goslin Creek, Red Creek, Spring Creek, Marsh Creek, and Sage Creek.” The Green River is not a tributary. Were any of the other rivers and creeks found to be eligible or suitable to be designated as Wild and Scenic Rivers in the 2024 Ashley NF LUP process?

Page 45, Figure 11. This would be a good figure in which to show Wild and Scenic River designations, if any, within the FGNRA.

Page 48, the USFS states that it is the Desired Condition of the FGNRA as it relates to fire and fuels to have “Wildfire affected areas and other disturbed areas are managed for spread of cheatgrass, Halogeton, and other invasive species throughout the FGNRA.” The State suggests that the way this is intended to be worded is as follows with edits in red: “Wildfire affected areas and other disturbed areas are managed **to control the** spread of cheatgrass, Halogeton, and other invasive species throughout the FGNRA.” If this is what was intended, the State requests that this provision be updated. If not, the State would oppose it.

Pages 48 and 49 as it relates to fish and wildlife, the State greatly appreciates USFS’ efforts to include the State and other agencies in managing wildlife and utilizing our wildlife management plans.

Page 49 under the “Minerals” section of the plan, the USFS sets a “Standard” stating: “Commercial sale of non-leasable common variety minerals (such as gravel, rock, or sand) within the FGNRA shall be prohibited because such developments are not compatible with and could impair the recreation, scenic, and historic values of the FGNRA.” The State and Daggett County understand and agree that the commercial sale of these minerals may impair the values of the FGNRA. However, we request that the possibility of having a gravel

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pit/crusher be left open to the State and Daggett County. Daggett County is over 90% federally owned and it is difficult to attain these resources because of restrictive management practices in so much of its jurisdiction (roadless area, wilderness, etc.). Maintaining roads and infrastructure is an essential government function and this is necessary for localities to perform their most basic duties. In addition, the USFS may find a need for non-leasable minerals for administrative use in the FGNRA to maintain and expand transportation and parking infrastructure. The plan should not preclude the USFS from doing so in appropriate locations that would not impact scenic integrity.

Page 49, Public Safety Goal 01 should include coordination with the Bureau of Reclamation since the BOR has jurisdiction over the surface lying below full pool levels (see Management Approach on Page 53, Line 32).

Pages 50 and 51, the USFS outlines its goals, objectives, desired conditions, and guidelines for recreation. The State appreciates the thoughtfulness of the USFS in including stakeholder input in most of these matters. One matter that may be worth considering is the fact that the USFS is seeking to expand its paddle trail system. The State encourages USFS to do so in a manner that would reduce user conflicts. For example, paddle trails should not be sited in areas that currently have heavy motorized use and are very popular for that reason.

Page 50, Desired Condition 04, Lines 13-14: “Where feasible, recreation areas are interconnected with **motorized or** nonmotorized trails.”

Page 50, Desired Condition 05, Lines 15-16: “Outdated or obsolete infrastructure is replaced with appropriate facilities that meet current and future use **recreation needs.**”

Pages 50 & 51, Desired Conditions and Objectives: The plan should mention in the Recreation and Facilities section the need to coordinate with Daggett County in the implementation of their Trails Master Plan as it pertains to projects identified in the FGNRA.

Page 51, Goal 02, Line 10: “Collaborate with **federal,** state, and local stakeholders and agencies to upgrade existing infrastructure.” There is a huge maintenance backlog at the FGNRA and it is going to take federal funding to catch up on existing infrastructure needs. It is not practical to rely on state and local stakeholders to accomplish this goal.

Page 51, Goal 03, Lines 13-14: “ In coordination with state and local stakeholders and agencies, explore additional options for increasing capacity and distribution of demand/use at the Spillway boat **and raft** launch site.”

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Page 51, Goal 06, Lines 19-21: “ In coordination with affected agencies and stakeholders, including BOR, develop a reservoir operation action plan identifying jurisdiction and mitigation steps to be taken at points in reduced water level elevations.”

Page 52, under Standard 01, the USFS states “Land use permit renewals shall only be authorized if they are compatible with and do not significantly impair the recreation, scenic, scientific, and historic values of the FGNRA. Operation and maintenance plans of existing permits must be compatible with and do not significantly impair the recreation, scenic, scientific, and historic values of the FGNRA.” The State asks that it be worded the following way: *Land use permit renewals shall only be authorized if they are compatible with and do not significantly impair the recreation, scenic, scientific, and historic values of the FGNRA. Operation and maintenance plans of existing permits must be compatible with and do not significantly impair the recreation, scenic, scientific, and historic values of the FGNRA. Mitigation measures may be used to determine whether land use is compatible with or significantly impairs the values of the FGNRA.* The State asserts that mitigation should be a viable option for maintaining certain uses of the land rather than prohibiting future uses that may be necessary to enhance the health, safety, and welfare of the people of Utah.

Page 52, Guideline 02, Lines 15-17: “New utility transmission infrastructure in the FGNRA are suitable only within the designated corridors. Buried transmission, utilities, and telecommunications lines are suitable along existing Forest Service System roads.” This guideline should be amended to clarify if and where new communication towers would be considered for special uses within the FGNRA.

Page 52, Goal 01, Lines 27-28: “Evaluate opportunities to design and construct new trails to connect with existing trails in coordination with local user groups **and in accordance with local trails master plans.**”

Page 53, Water Goal 01, Lines 3-5: “Cooperate with the Wyoming Department of Environmental Quality and Utah Department of Environmental Quality, **the Sweetwater County Health Department,** and the Tri-County Health Department to conduct water quality monitoring for harmful cyanobacterial blooms, waterborne pathogens, and other water quality issues.”

Page 54 of the draft plan, the USFS explains its management approaches dealing with recreation and facilities. Under Management Approach 01, USFS states “Maintain up to date master development plans for recreation special use permitted areas.” We would suggest that this item be amended to read as follows: Maintain up to date master development plans for

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recreation special use permitted areas *that are consistent with state and local plans to the greatest extent possible.*”

Page 54: There is repetitious text in Recreation and Facilities Management Approach 03 and 04 (Lines 11-16).

Page 54, Management Approach 10, Lines 28-29: “Map existing mountain bike trails on the FGNRA. Evaluate non-system routes included for inclusion in the Forest Service trails system. Audit existing trails for safety and sustainability. Coordinate with counties to implement trails master plans where FGNRA projects are envisioned.”

Page 55, Management Approach 14, Lines 1-3: “Prioritize existing and proposed recreation sites and facilities based on use and benefit. Allocate resources and funding to areas of greatest benefit and need and prioritize high-use area improvements and maintenance. **Aggressively seek federal funding and elevate the FGNRA to a higher funding priority for the Intermountain Region.**” Many of the attendees at the 2022 field tour have the impression that the Intermountain Region considers the FGNRA to be the proverbial “red-headed step-child” when it comes to funding priorities.

Page 55, new Management Approach: **22: Cooperate with the Bureau of Reclamation to maintain restroom facilities at the Flaming Gorge Dam Visitor’s Center open to the public visiting the dam and the adjacent USFS day use site.**

Page 55, Management Approach 01 for Special Uses, Line 21: “Telecommunication sites are managed according to the most recent site management plans.” This management approach lacks direction on how to deal with **new** special uses and telecommunication sites.

Page 55, Management Approach 01 for Transportation, Lines 26-29: “Identify and prioritize existing roads and parking lots in need of slurry seal or crack sealing. Collaborate with **national and regional USFS offices and** local partners to identify and pool resources for road and parking lot maintenance. Prioritize surface maintenance on roads where unacceptable environmental damage is present due to erosion or widening.”

Page 55, Management Approach 02 for Transportation, Lines 30-31: “Provide route maintenance to avoid watershed problems on system roads and strive to eliminate use on unauthorized roads, **unless an analysis determines that an unauthorized road is suitable for inclusion in the official transportation system for recreation use, administrative use, seasonal use or to provide a fire break or other resource benefits.**”

III) Specific Comments on the EA

Page 1, Line 9: One of the management challenges we heard consistently during the July 2022 field tours was the lack of funding to maintain and improve facilities in the face of increasing visitation. Many expressed frustration that the Intermountain Region of the USFS treats the FGNRA as the proverbial “red-headed step child” and routinely does not allocate sufficient resources to the area. The EA should include a financial section addressing potential funding sources to address a well-documented backlog of maintenance, repair, and upgrades needed to roads, utilities, and other infrastructure in the FGNRA.

Pages 3 & 4: There is no mention here of certain other plans, including the State of Utah Resource Management Plan and the Daggett County Resources Management Plan. There may be a similar plan in Sweetwater County, Wyoming. During scoping comments, the State requested that the Ashley National Forest analyze how the FGNRA plan achieves consistency with several listed State plan policies to the greatest degree possible, in accordance with federal law. Also, during scoping the State requested that the Ashley National Forest analyze how the FGNRA plan achieves consistency with several listed objectives and policies of the Daggett County Resource Management Plan. The EA fails to analyze the consistency of the proposed FGNRA plan with these state and local plans and fails to mention whether the USFS will do so during this planning process.

Page 7, Lines 6-10: “Incorporation of management area-specific direction requires a programmatic forest plan amendment. Following the direction in CFR 219.13 (a), alternative B would be formally incorporated into the Ashley National Forest Revised Plan as a programmatic forest plan amendment under the guidelines established in CFR 219 following the completion of this environmental review and public involvement process as required under NEPA.” It seems presumptuous to state here that alternative B will be incorporated. Does this mean that Alternative B is the proposed action, or should this paragraph be re-worded to indicate that the selected alternative will be formally incorporated in the Ashley NF LUP?

Page 7, Lines 15-21: The management challenges listed here are slightly different from the challenges listed on Page 1. Is this inconsistency intentional? The challenge of lack of funding is missing here also.

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Page 7, Lines 26-27: “Examples include management direction **associated with** parking facilities prioritization, season of use for facilities, and coordination related to reservoir water level to maximize recreational use.”

Page 7, Lines 31-34: “This environmental assessment analyzes the effects of adopting a management area plan for the FGNRA, along with an amendment to the 2024 Ashley National Forest Land Management Plan (LMP) (Forest Service 2024) to include adoption of the proposed management plan. The substantive requirements analysis of the proposed programmatic plan amendment to the 2024 LMP is summarized in appendix **C D**.” **Compare this paragraph to:**

Page 8, Lines 5-8: “This environmental assessment analyzes the effects of adopting a management area plan for the FGNRA, along with an amendment to the 2024 Ashley National Forest Land Management Plan (LMP) (Forest Service 2024) to include adoption of the proposed management plan. The substantive requirements analysis of the proposed programmatic plan amendment to the 2024 LMP is summarized in appendix D.” **It appears that these two paragraphs on Pages 7 and 8 are repetitious and that Appendix D is the correct reference as Appendix C is Public Law 90-540.**

Pages 7 & 8: “This analysis analyzes three alternatives: a no action alternative representing the 2024 LMP (alternative A), a proposed action which is the proposed area management plan for the FGNRA (alternative B), and a variation of the proposed action that includes proposed construction of 3 group sites, paving of Antelope Flat Road, and installation of an attenuator as well as variation for utility corridors (alternative C). A narrative description of alternatives is included in the Elements Common to All Alternatives section through the Alternative C: FGNRA Management Plan with Recreation Emphasis section, below, with details by alternative included in table 2-1.” **Compare this paragraph to:**

Page 8, Lines 9-15: “This analysis analyzes three alternatives: a no action alternative representing the 2024 LMP (alternative A), a proposed action which is the proposed area management plan for the FGNRA (alternative B), and a variation of the proposed action that includes proposed construction of 3 group sites, paving of Antelope Flat Road, and installation of an attenuator (alternative C). A narrative description of alternatives is included in the Elements Common to All Alternatives section through the Alternative C: FGNRA Management Plan with Recreation Emphasis section, below, with details by alternative included in table 15 2-1.” **It appears that these two paragraphs on Pages 7 and 8 are repetitious.**

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Page 10, Table 2-1: “DC 01 Wildfire affected areas and other disturbed areas are managed ~~for~~ **to control the** spread of cheatgrass, Halogeton, and other invasive species throughout the FGNRA.” **This would be consistent with Page 97, Line 34.**

Page 14, Table 2-1: “STD 01 Commercial sale of non-leasable common variety minerals (such as gravel, rock, or sand) within the FGNRA shall be prohibited because such for developments are not compatible with and that, **in the opinion of the Forest Supervisor,** could impair the recreation, scenic, and historic values of the FGNRA.” **Please indicate here who makes the determination of whether impairment would occur.**

Page 15, Table 2-1: “DC 01 Developed boat ramps and day use areas are safe and well maintained. Boat ramps and day use areas have adequate parking and amenities for current use, anticipated future use, and **are adaptable to** changes to reservoir elevation.”

Page 15, Table 2-1: “DC 04 Large public recreational developments or complexes are concentrated. Smaller satellite campgrounds, boating camps, rest stops, and observation sites are suited for and can be developed to provide for developed and dispersed use. Adequate buffers between developments are provided. Where feasible, recreation areas are interconnected with **motorized or** nonmotorized trails.”

Page 17, Table 2-1: “DC 15 Scenic byway and backway day use sites within the FGNRA are developed and maintained through partnerships and **provide** interpretation information.”

Page 19, Table 2-1: “OB 01 Designate 10 ~~new~~ miles of new paddle trails within the first five years of plan approval.”

Page 19, Table 2-1: “OB 03 Over the life of the plan, develop a mountain bike complex (for example, on Dowd Mountain, **near Little Hole** or Greendale Junction), in collaboration with stakeholders.” **During the July 2022 field tours, it was noted that some mountain bike trails exist on the hills just north of Little Hole.**

Page 20, Table 2-1: “OB 07 Install **a wave** attenuator at Antelope Flat within 10 years.” **This change should be made throughout the document since there are many types of attenuators.**

Page 21, Table 2-1: “ST 01 Land use permit renewals shall only be authorized if **the Forest Supervisor finds** they are compatible with and do not significantly impair the recreation, scenic, scientific, and historic values of the FGNRA. Operation and maintenance

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plans of existing permits must be compatible with and do not significantly impair the recreation, scenic, scientific, and historic values of the FGNRA.”

Page 21, Table 2-1: “GL 01 Special land uses should be authorized based on a demonstrated public need where the need cannot be met outside the FGNRA and where the foreseeable effects on other existing or potential uses are acceptable.”

Page 22, Table 2-1: “GL 02 New utility transmission infrastructure in the FGNRA are suitable only within the designated corridors. Buried transmission, utilities, and telecommunications lines are suitable along existing or new Forest Service System roads.”

Page 27, Lines 29-30: “Class I areas receive stricter protection, while class II areas permit 30 controlled growth with limited pollutant increases.” The USFS should **elaborate here on whether the FGNRA is within a Class I or Class II area.**

Page 31, Lines 5-6: “The Green River and its associated riparian and wetland habitats provided important resources across a broad swath of desert in southwestern Wyoming.” **This sentence fails to recognize the contributions of the Green River in the canyonlands of northeastern Utah.**

Page 31, Table 3-1: “Rock Shelter - Basket - Corn Storage Feature” **These are meant to be types of resources rather than table column headings; thus, they should not be bolded and centered in their cells.**

Page 33, Table 3-2: “Road - Visitor Center - Sawmill” **These are meant to be types of resources rather than table column headings; thus, they should not be bolded and centered in their cells.**

Page 35, Lines 4-5: “Some of the greatest potential threats to cultural resources—wildfire, erosion, looting, vandalism, trespass, and unmonitored dispersed recreation—are those activities not initiated by agency actions.” **It should be noted here that erosion and permitted activities may lead to the discovery of cultural resources that would have otherwise been unknown and would not have contributed to the body of scientific knowledge.**

Page 37, Lines 6-9: “Such directions include the desired condition for the development of smaller dispersed recreation sites interconnected with motorized or nonmotorized trails, the goal of expanding parking areas and recreational infrastructure at boat ramps and trail access points, and stated objectives that include the development of a

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mountain bike complex over the life of the FGNRA Management Plan.” **Flexibility should exist for motorized or nonmotorized trails depending on the distance between dispersed recreation sites.**

Page 37, Lines 22 – 24: “Recreation management direction under alternative C would include the same elements as under alternative B, plus the additional objectives to construct three group sites, pave Antelope Flat Road and install ~~an~~ **a wave** attenuator³ at Antelope Flat—all within 10 years of plan approval.”

Page 37, Lines 34-35: “Natural occurrences, such as wildfires, would result in ~~additive cultural~~ **additive cultural** resource impacts in conjunction with vegetation treatments, recreational uses, timber harvesting, and livestock grazing.”

Page 40, Lines 5-7: “Alternative B contains a desired condition under which disturbed areas would be managed **to control** the spread of cheatgrass (*Bromus tectorum*), halogeton (*Halogeton* spp.), and other invasive species throughout the FGNRA.” **This would be consistent with Page 97, Line 34.**

Page 45, Lines 24-27: “Temporary habitat alterations from surface disturbance or vegetation removal could influence wildlife species to **temporarily** avoid areas of disturbance. Moreover, the removal of vegetation species could **temporarily** limit available foraging species, protection from predators, and nest and den sites.” **These two sentences seem to run counter to the Analysis Assumption that “Temporary adverse impacts on at-risk species from short-lived physical activities, such as thinning projects or prescribed fire, would be outweighed by long-term benefits from overall improved ecological conditions.”**

Page 46, Lines 24-25: “Avoid morning and evening noise disturbance from large trucks to active sage-grouse leks during the breeding season, generally between March 1 and May 15, depending on weather conditions. **Since large trucks are one of many potential sources of noise, suggest leaving it general as is done in Lines 26-27.**

Page 47, Lines 5-7: “Alternative C would include the same elements as under alternative B; however alternative C would include additional objectives to construct three group sites, pave Antelope Flat Road, and install ~~an~~ **a wave** attenuator at Antelope Flat, all within 10 years of plan approval.”

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Page 47, Lines 8-10: “However, over the long term, adequate maintained recreational ~~uses~~ facilities could help restrict visitors from recreating in sensitive habitat areas and causing damage in undisturbed areas.

Page 49, Lines 26-27: “Alternatives B and C would provide some greater opportunities for interpretation, so the ~~cumulative contribution of alternative A~~ action alternatives would beneficially impact interpretation to a greater extent than ~~the action alternatives~~ Alternative A.”

Page 49, Lines 32-33: “In addition, rangelands provide habitat for wildlife and space for other uses, such as recreation, and grazing reduces fuel loads that contribute to wildfire risk.”

Page 52, Lines 3-4: “Some FG NRA allotments also extend into BLM-administered lands and the BLM administers some allotments within the FG NRA.”

Page 54, Lines 25-27: “In addition, a management approach is included for the FG NRA to schedule livestock grazing outside the Memorial Day to Labor Day high visitor use period in areas of heavy public use. Normally, the Forest Service does not allow livestock in designated recreation sites.” **Please elaborate here on what the impact of this management approach would have on grazers. Is fencing in place or does fencing need to be installed in certain areas to keep livestock out of heavy public use areas during the high visitor use period?**

Page 54, Lines 35-37: “Increased development of new trails and recreation facilities, based on management direction under alternative B, could increase the potential for livestock-recreationist impacts.

Page 56, Lines 1-27: **Camping appears twice in the list of recreational opportunities.**

Page 61, Line 38: **This section heading is “Developed Recreation Sites” but the entire content is associated with dispersed camping.**

Page 62, Lines 37-38: “The Forest Service would designate 10 ~~new~~ miles of new paddle trails within the first 5 years of plan approval, which would improve paddling access in the FG NRA.”

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Page 62, Lines 38-39: “Beginner to advanced paddle trails would be available to inexperienced **provide** visitors for recreational opportunities **for a broad spectrum of users.**”

Page 63, Lines 7-8: “Alternative B also would provide more **recreation** opportunities for visitors, which would increase visitation to the FGNRA.”

Page 63, Lines 13-16: “Alternative B would require coordination with Forest Service partners to develop and improve **recreation** facilities throughout the FGNRA. Over the life of the plan, management plans would include development of a mountain bike complex (for example, on Dowd Mountain, **at Little Hole**, or Greendale Junction), in collaboration with stakeholders.” **During the July 2022 field tours, it was noted that some mountain bike trails exist on the hills just north of Little Hole.**

Page 63, Lines 29-30: “Where feasible, recreation areas would be interconnected with **motorized or** nonmotorized trails.” **Flexibility should exist for motorized or nonmotorized trails depending on the distance between dispersed recreation sites.**

Page 64, Lines 28-29: “Under alternative C, ~~an~~ **a wave** attenuator would be installed at Antelope Flat within 10 years.” **The same change is needed on Page 69, Line 31; Page 80, Line 41; Page 87, Line 31; Page 98, Line 9.**

Page 67, Table 3-10: **This table should include a footnote indicating why and where the 47 acres are that do not have a scenic integrity objective level.**

Page 69, Lines 21-24: “For example, within 5 years of plan approval, the Forest Service would designate 10 miles of new paddle trails and develop and construct an interpretive site for the public to learn about the indigenous and native people who lived in the area now designated as the FGNRA within 5 years of plan approval.” **It seems like paddle trails and one interpretive site would have a very minor impact on scenic values.**

Page 71, Lines 20-22: “To identify communities of potential environmental justice concern within the planning area, the Forest Service conducted an environmental justice screen of the counties overlapping the planning area (Sweetwater County, Wyoming, and Dagget County, Utah).”

Page 72, Table 3-11: **Daggett County is misspelled in this Table and on Line 14 of Appendix D, Page 1.**

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Page 79, Lines 24-25: “Unauthorized user-made trails, especially around the gorge reservoir itself, are actively impacting soil quality and increasing the spread of invasive species.”

Page 80, Lines 16-21: “Recreation plan elements under alternative B would include management directions with the potential to affect soils in the FGNRA, including the desired condition for the development of smaller dispersed recreation sites interconnected with motorized or nonmotorized trails, the goal to expand parking areas and recreational infrastructure at boat ramps and trail access points, and objectives that include developing a mountain bike complex over the life of the plan.”

Page 81, Lines 36-37: “The FGNRA contains multiple lands special use permits and rights-of-way (ROWs), as shown in table 3-13 and figure 3-4, below.” **Figure 3-4 displays Inventoried Roadless Areas instead of special use permits and ROWs. There appears to be no discussion in the EA regarding roadless areas.**

Page 87, Lines 15-19: “Recreation plan elements under alternative B would include management directions with the potential to affect transportation in the FGNRA, including the desired condition for the development of smaller dispersed recreation sites interconnected with motorized or nonmotorized trails, the goal to expand parking areas and recreational infrastructure at boat ramps and trail access points, and the objective of developing a mountain bike complex over the life of the plan.”

Page 87, Lines 21-23: “Prohibiting the commercial sale of nonleasable minerals, such as gravel, rock, and sand, within the FGNRA under alternative B could also reduce the potential impacts on the transportation system from mineral development, as compared with the no-action alternative.” **But could this prohibition also shift the impacts from FGNRA roads to roads outside of the FGNRA as non-leasable minerals will continue to be needed for road and parking lot improvement projects inside the FGNRA and in the surrounding area?**

Page 90, Figure 3-5: **Change “Figure X-X” to “Figure 3-5”.**

Page 95, Figure 3-6: **Change “Figure X-X” to “Figure 3-6”.**

Page 96, Lines 3-4: “The analysis compares the potential impacts from the proposed management plan activities on vegetation communities between alternative A and the action alternatives ~~(C and D)~~ **(B and C)**.”

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Page 102, Lines 25-28: “Alternative B contains a desired condition, under which the Forest Service would implement additional vegetation treatments by managing wildfire-affected areas or other disturbed areas for the ~~spread~~ **control** of cheatgrass and other invasive plants, which would improve ecosystem health and ultimately water quality by further reducing the risk of catastrophic wildfires and associated erosion potential.” **This would be consistent with Page 97, Line 34.**

Chapter 4: **It would be appropriate here to discuss efforts to achieve consistency with the Resource Management Plans, Transportation Plans and Trails Master Plans of the sovereign State of Utah, Daggett County, Sweetwater County and the sovereign State of Wyoming.**

Appendix A, Page 1, Lines 10-13: “Those 1986 plan components were not carried forward since the plan components included jurisdiction outside of Reclamation’s purview or the plan components were site- or project-specific, which is outside of the scope of the programmatic nature of ANF LMP and the proposed FGNRA Management Plan and alternatives.” **It is not clear in this sentence whether the 1986 plan contained components that were outside of USFS purview or components that were actually within the realm of US Bureau of Reclamation decision-making.**

Appendix A, Table A-1 (all pages): “Previous Management in the 1986 ~~Ashely~~ **Ashley** National Forest LMP, Appendix A”.

Appendix A, Table A-1, Page 6: “(6) Assure safety for downstream people, property, watershed, and other values in the installation ~~and~~ **and** maintenance of water storage and diversion structures and facilities.”

Appendix A, Table A-1, Page 26: “Develop only a relatively-small proportion of the total ~~NKA~~ **NRA** area, leaving most of the land available for back country-type recreational activities.”

Appendix A, Table A-1, Page 40: “Footnote 41: This was not included in the Ashley National Forest LMP or FGNRA Management Plan because zoning **ordinances and building codes are** ~~is~~ managed by counties and is outside the Forest Service’s purview.”

Appendix B, Page 2, Lines 13-19: “03 Communicate and coordinate with the BOR regarding management of the shoreline of the Flaming Gorge Reservoir below the high-water mark, anticipated dam releases, and BOR facilities as well as increases in flows on the Green River below the Flaming Gorge Dam for public safety and resource protection. 04

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Communicate and coordinate with the BOR regarding Flaming Gorge Dam releases and increases in flows on the Green River below the Flaming Gorge Dam for public safety and resource protection.” **Management approach 04 is duplicative of the second portion of management approach 03.**

Appendix B, Page 2, Lines 31-32: “10 Map existing mountain bike trails on the FGNRA. Evaluate non-system routes ~~included~~ **for potential inclusion** in the Forest Service trails system. Audit existing trails for safety and sustainability.”

Appendix B, Page 2, Lines 33-34: “11 Continue management planning for each segment of the reservoir shoreline which is receiving concentrated recreational use.” **Would this be a good place to provide a management approach for enforcement of the requirement to launch watercraft only at approved ramps?**

Appendix D, Page 1, Line 1: “Appendix ~~B~~ **D**.”

Appendix D, Page 2, Lines 28-30: “In tandem with the ANF LMP, the FGNRA Management Plan would support the local and regional economy through increased jobs, wages, economic output, nonmarket values, and ecosystem services from ~~it~~ **its multiple** uses, particularly recreational opportunities.”

The EA does not adequately respond to State scoping comments (see letter dated January 10, 2023)

Inventory of Existing Conditions: The EA should contain an inventory of existing conditions of FGNRA infrastructure, rangelands, vegetation, forests, and waters so the reader and land managers can better understand the difference between these existing conditions and the desired conditions outlined in the plan. Maps and photos would be helpful to illustrate these existing conditions. It appears that this scoping comment was not addressed as the EA still falls short of describing existing conditions compared to the desired conditions.

Fire and Fuels: The State suggested during scoping that this section include another desired condition addressing adequate thinning of trees to reduce the risk of uncharacteristic wildfire. The one management approach in this section addresses forest system routes serving as fire breaks as follows:

01 New and existing forest system routes may function as fuel breaks where appropriate to the location and vegetation type.

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The State suggests that this section include other management approaches demonstrating the Forest Service commitment to reducing tree density and other types of active management that are critical for forest health.

Fish and Wildlife: The State appreciates the Plan calling for continued coordination between the Forest Service and the state wildlife management agencies. The FG NRA enabling act requires such coordination as the Forest Service and the states permit hunting, fishing and trapping within the NRA at appropriate locations and during the appropriate seasons. The management approach mentions the Wyoming Mule Deer and Antelope Migration Corridor Protection Executive Order and the Utah Wildlife Migration Initiative. There are other state wildlife plans that should be mentioned, such as the applicable Utah deer, elk, bighorn sheep, and mountain goat unit management plans and the Utah statewide management plans for moose and pronghorn. The Northeast Region Office of the Utah Division of Wildlife Resources (UDWR) in Vernal could assist in identifying the wildlife plans applicable to the planning area.

During the July 2022 field tour, UDWR staff mentioned that there are annual coordination meetings between the Ashley National Forest and the UDWR but there is a perceived lack of coordination between the UDWR and the Wyoming Fish and Game agency. The State would encourage the Forest Service to plan for and facilitate coordination between all entities involved with the management of fish and wildlife within the FG NRA. A memorandum of understanding between the Forest Service, the Bureau of Land Management, the Bureau of Reclamation, and the state wildlife management agencies was suggested during the field tour and should be called for in the Plan.

While at Cedar Springs, tour attendees discussed the lack of shore-angling access points on the Utah side. A better connection via docks between the boat ramp and the marina was also mentioned. Users were observed having difficulty with the design of the boat launch and parking lots. The Plan should address the need to work with the fishing and boating community to meet these needs at Cedar Springs and other marina and boat launch locations.

Interpretation: While the July 2022 field tour was at the Red Canyon Visitors Center, attendees enjoyed the view across the canyon to the “Bare Top Mountain” wildlife management area to the north. The EA does not mention anything about this area and how the Forest Service coordinates with the Utah Division of Wildlife Resources as the DWR manages their 120 acres of inholdings for wildlife benefits. Staff noticed no interpretive material associated with the Bare Top area at the visitor center. The EA mentions additional interpretation regarding tribal history in the area but should also include interpretation associated with Bare Top Mountain and other significant inholdings.

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Minerals: In scoping comments, the State noted that there is one standard for Minerals in the Plan associated with a prohibition on new gravel, rock, and sand mining in the FGNRA. It may not be wise to prohibit the extraction of gravel, rock, and sand inside the FGNRA. The Ashley National Forest has located and maintained non-leasable material borrow pits within the boundaries of the forest and such can be placed in locations that will have no negative impacts on recreation, scenic, and historic values. Failure to provide for borrow pits near potential construction projects within the FGNRA may result in higher material transportation costs and higher facility construction costs if adequate material sources are not available on other lands close to the FGNRA.

If any valid, existing mineral rights predate the 1968 FGNRA Act or any mining locations outside of the FGNRA that obtain access through the FGNRA, the State requested that those be accounted for in this Plan.

It appears that none of the scoping comments above were addressed in the EA.

Rangeland Management: In scoping comments, the State noted that the plan should describe how grazing will be managed in the various landscapes from the forested areas in the southern sections of the NRA to the high desert conditions in the northern sections of the NRA. The State suggested that additional plan components be considered to address rangeland and grazing topics such as water facilities, cattleguards, livestock gathering or trailing areas, maintenance of AUMs at historic levels, and whether any grazing areas are considered open range. Conversion of the South Buckboard area to a fee campsite would impact grazing and the permittees should be involved in the conversation. In spite of these scoping comments, the only two management approaches set forth for rangeland management are:

01 Notify the public of the importance of keeping gates on allotment and pasture fences closed through signage.

02 In areas of the FGNRA, utilize and continue to implement the Memorandums of Understanding (MOU) with the Bureau of Land Management in Utah and Wyoming to manage livestock grazing permits on the FGNRA.

At the June 14, 2023, meeting held in Dutch John, it was noted that since it is not feasible to provide fencing to keep livestock off highways, it was recommended that adequate “Open Range” signage be installed and that solar-powered signs be used during the active

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seasons of use to warn motorists of the presence of livestock. The EA does not address this issue.

Recreation and Facilities Management: The State noted in its scoping comments that the interpretive site at the Flaming Gorge Dam is just as important and as frequently visited as the Red Canyon Visitors Center. The EA and Plan should indicate how the Forest Service intends to work with the Bureau of Reclamation to continue to make restrooms and other facilities available to the public at the dam, especially since the day-use area with covered picnic tables has been provided nearby.

Recreation and Facilities Management Approach 07 reads:

“Construct additional vehicle parking and sanitation facilities in areas where concentrated public use is causing adverse environmental effects or take administrative measures to control such use.”

The state noted in scoping comments that the EA and Plan must address the impacts of solid waste generated within the FGNRA on the City of Manila landfill. The Mayor of Manila expressed concern during the July 2022 field tour that waste generated from the FGNRA has required the City to expend additional resources to expand their landfill (three more cells) above and beyond what is needed to serve their community. It appears that the EA does not address these solid waste impacts and Manila City concerns.

Recreation and Facilities Management approach 14 reads:

Prioritize existing and proposed recreation sites and facilities based on use and benefit. Allocate resources and funding to areas of greatest benefit and need and prioritize high use area improvements and maintenance.

During scoping comments, the State recommended that the EA and plan specifically document the need and management approach to upgrade obsolete campground infrastructure. Many of the existing developed campgrounds were built to accommodate camping vehicles commonly used in the 1960's-1970's. Many of today's larger motorhomes and fifth wheel RVs are too large to fit into the small campsites at places such as, but not limited to, the Fireman's Memorial, Cedar Springs, Canyon Rim, and Deer Run Campgrounds and there is a lack of RV dump stations within the FGNRA. If the FGNRA plan is to ensure that the purposes of the Enabling Act are met, i.e. to provide public outdoor recreation benefits, the plan should include direction on how the Forest Service will establish, adapt, renovate, replace or maintain facilities to meet the needs of the current and future recreating public.

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The July 2022 field tour included a stop at a large, abandoned campground facility to the north of the Lucerne Marina. There has been a troubling lack of maintenance at the Antelope Flat facilities as well; however, recent activity there to upgrade the water system is a positive sign. The State suggests that the Plan provide some guidance regarding the future analysis and disposition of the derelict facilities existing at this location and any other similar locations within the FGNRA. If the plan can provide specific guidance for the Little Hole trail along the Green River, it should be able to address some of these specific recreation challenges noted above.

Daggett County has adopted a Trails Master Plan. The Forest Service should review this plan and coordinate with the County as it makes plans for motorized and non-motorized routes and trails within the FGNRA. This should be addressed in the recreation or travel management sections of the EA and the plan.

During the field tour, there was a discussion of the “boat-in” campsites available in the FGNRA and that some of them have been removed due to lack of maintenance and sanitation concerns. There is a lack of soils needed to accommodate septic systems at these sites and outhouses or floating toilets are high-maintenance and high-cost facilities. The EA and Plan should provide some direction for the future of these unique camping opportunities.

Special Uses:

The EA lists only one management approach for telecommunication sites:

01 Telecommunication sites are managed according to the most recent site management plans.

While this management approach addresses existing telecommunication sites, the State suggested in scoping comments that guidance be given in the Plan for future telecommunication towers that may be needed in the FGNRA to ensure adequate cellular phone service, especially in the event of an emergency.

The plan should address the possibility of additional utility corridors within the FGNRA, in areas where scenic values would not be compromised, to serve local customers or the region, as solar, hydro, wind, geothermal and other energy facilities are developed to serve the growing population in the West. The current EA makes no provisions for additional corridors.

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Timber: There is only one management approach for timber:

01 Wherever possible, harvest timber either by use of the existing road system, by winter logging without roads, or by using temporary roads that can be effectively closed and obliterated following logging.

The State suggested during scoping that there be a management approach, beyond the roads issue, that timber management be accomplished in a manner that promotes healthy forests and watersheds while providing timber for the industry and reducing wildfire risk.

Transportation: Management guidance in the EA is currently limited to the following:

01 Identify and prioritize existing roads and parking lots in need of slurry seal or crack sealing. Collaborate with local partners to identify and pool resources for road and parking lot maintenance. Prioritize surface maintenance on roads where unacceptable environmental damage is present due to erosion or widening.

02 Provide route maintenance to avoid watershed problems on system roads and strive to eliminate use on unauthorized roads.

03 Evaluate current and future uses to account for new types of recreation vehicles.

During scoping, the State recommended that the Forest Service consider whether unauthorized roads serve a public purpose and analyze whether they are causing resource damage before moving forward to close them. It may be that some of these roads could be utilized in reaching plan goals to design and construct new motorized and nonmotorized routes and trails to connect existing trails and public use areas.

During the July 2022 field tour, there was some discussion regarding UDOT's use of sanding salt along Highway 44 and 191 and the impacts on vegetation along the highway. The EA does not address the need for the Forest Service and UDOT to coordinate and address this issue.

The USFS should address the upgrading of access roads from state highways to points of interest along the FGNRA. For example, the roads leading to the Buckboard Marina, Anvil Draw Boat Launch, and the Red Canyon Visitors Center were observed during the July 2022 field tour to need upgrades.

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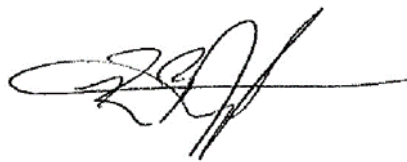
IV) Conclusion

The State requests USFS to make decisions that are consistent with the *Utah State Resource Management Plan*²⁴. The State expects USFS to strive to achieve consistency to the greatest degree possible with the Daggett County land use plan²⁵ as USFS makes land use decisions associated with the *Flaming Gorge National Recreation Area Management Plan*.

The State commends USFS's response to confront the challenges of the Flaming Gorge National Recreation Area to resolve user conflicts and make recommendations that could lead to reduced conflict, reduce potential impacts on water quality and quantity, protect fragile desert ecosystems that are vulnerable to increased and unauthorized recreation, and maintain increased visitation and recreation.

Please feel free to contact this office if there are any questions regarding the contents of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Redge B. Johnson', written over a horizontal line.

Redge B. Johnson
Director

²⁴ <https://rmp.utah.gov/>

²⁵ <https://tinyurl.com/Daggett-County-Utah-CRMP>