



COALITION OF LOCAL GOVERNMENTS

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FORT BRIDGER, WY 82933

COUNTY COMMISSIONS OF SWEETWATER, LINCOLN, AND UINTA - WYOMING, AND DAGGETT - UTAH;
AND CONSERVATION DISTRICTS FOR LINCOLN, LITTLE SNAKE, STAR VALLEY, SUBLETTE, SWEETWATER, AND
UINTA - WYOMING

February 24, 2025

VIA PROJECT WEBPAGE

USDA Forest Service Intermountain Region
Attn: Objection Reviewing Officer
324 25th Street
Ogden, UT 84401

Re: Coalition of Local Government's Objection to the Flaming Gorge National
Recreation Area Management Plan

Dear Reviewing Officer,

The Coalition of Local Governments ("Coalition") submits the following objections to Forest Supervisor's, Kristy Groves, Flaming Gorge National Recreation Area Management Plan ("FGNRA Management Plan") and Final Environmental Assessment ("Final EA"). This objection is submitted in compliance with 36 C.F.R. §§ 219.53, 219.54. The Coalition also requests the opportunity to participate in any objection resolution meetings that address livestock grazing, bighorn sheep, timber, recreation, vegetative management, and others that are associated with the positions of the Coalition in the following objection. 36 C.F.R. § 219.57(a).

The Coalition members have been cooperating agencies throughout this Plan revision process, as well as cooperators on the Ashley National Forest Land Management Plan revision. The Coalition supports the Forest Service's decision to revise the FGNRA Management Plan, but the Coalition has some additional revisions it would still like to see before the Forest Service finalizes the Plan. The Coalition's objections relate to management actions associated with recreation, grazing, and special lands uses, as well as the need to address how the FGNRA Management Plan fits in with the Ashley National Forest Land Management Plan ("LMP").

I. Coalition Interests

The Coalition is a voluntary association of local governments organized under the laws of the State of Wyoming to educate, guide, and develop public land policy in the affected counties. Coalition members include Sweetwater County, Uinta County, Lincoln County, Daggett County, Lincoln Conservation District, Uinta County Conservation District, Sublette County Conservation District, Sweetwater County Conservation District, Little Snake River Conservation District, and

Star Valley Conservation District. The Coalition serves many purposes for its members, including the protection of vested rights of individuals and industries dependent on utilizing and conserving existing resources and public lands, the promotion and support of habitat improvement, the support and funding of scientific studies addressing federal land use plans and projects, and providing comments on behalf of members for the educational benefit of those proposing federal land use plans and land use projects.

The counties and conservation district members of the Coalition enjoy the authority to protect the public health and welfare of their citizens and to promote the management and protection of federal land natural resources. Wyo. Stat. §§ 11-16-122, 18-5-208; Utah Code § 17-27a-102(1)(a). Given this statutory charge and wealth of experience in federal land matters, the Coalition members have participated as cooperating agencies on many federal projects and land use plan revisions and have coordinated efforts with Bureau of Land Management, U.S. Forest Service, and other federal, state, and local entities.

Activities on, and management of, the Ashley National Forest and specifically the FGNRA directly affect the Coalition members. Multiple uses such as livestock grazing, guiding and outfitting, and recreation affect the custom and culture of the counties and conservation districts. The FGNRA plays an important role in the socioeconomic well-being of the counties and conservation districts. The FGNRA also includes watersheds that supply the municipal watersheds for Sweetwater County and Daggett County, power the Flaming Gorge Dam that provides hydropower generation, and support industrial and agricultural water users.

II. OBJECTION TO LIMITED DISCUSSION ON HOW FGNRA MANAGEMENT PLAN WORKS ALONGSIDE THE ASHLEY NATIONAL FOREST LAND MANAGEMENT PLAN

The Coalition appreciates the Forest Service's additional discussion within the Draft EA about how the Ashley National Forest LMP provides the Forest-wide direction for the FGNRA and the proposed Management Plan would supplement the LMP with more specific direction for the FGNRA. However, there is no discussion on how the FGNRA Management Plan ties into the management direction from the Ashley National Forest LMP, or otherwise enhances what is already in place. The Forest Service has stated in response to comments that "addition of specific management components from the ANF LMP in the analysis would not help to distinguish between alternatives, as this management is in place for all alternatives." Final EA at Appendix E p.5. It may not help to distinguish between alternatives, but it would have helped show how the two Plans' directions work in conjunction with one another. The Coalition commented and requested this information during scoping and on the Draft EA.

This is also information that could have been provided or discussed in Chapter 2 of the Final EA and specifically in Table 2-1, which currently shows the little to no difference between all the alternatives considered. Instead of stating "no comparable plan direction" under Alternative A in the table, the Forest Service could have provided more context and identified which plan component of the Ashley National Forest LMP the Proposed FGNRA Management Plan direction was enhancing, revising, and/or in support of. This would have helped to show the interrelationship of the two Plans. This may have also helped to identify specific forest-wide direction from the

Ashley National Forest LMP that is not appropriate to apply to the FGNRA. For example, using naturally ignited fires to manage resources would not be appropriate on the FGNRA due to the amount of infrastructure and recreational sites. *See* Ashley National Forest LMP at 30 (FW-OB-FIRE-02). The Coalition generally supported what was accomplished in the Ashley National Forest LMP but during that plan revision process, the FGNRA was not a major focus nor was it specifically addressed. This is because the FGNRA Management Plan would be revised under its own NEPA analysis.

III. OBJECTION TO THE RECREATION AND FACILITIES MANAGEMENT DIRECTION

The Coalition has commented throughout the NEPA process on the failure of the Forest Service to address specific recreation sites on the Wyoming side of the FGNRA that require immediate maintenance and improvement. While the recreation management direction broadly discusses the goals to expand parking areas and recreation infrastructure, and upgrading existing infrastructure where safety is a concern and user density is overwhelming the resources, there are no objectives to address specific recreation sites that require maintenance within the near future. *See* FGNRA Management Plan at 51. The Management Approaches also encourage the Forest Service to explore partnership opportunities for funding and managing recreation sites and infrastructure. *Id.* at 55. While this direction is helpful, it would be more encouraging to see the Forest Service acknowledge and plan for the improvement of specific recreation areas. The Buckboard Marina, the South Buckboard Marina, and Firehole Campground are three specific recreation sites that are in desperate need of maintenance and improvements. Firehole Campground, in particular, does not have bathrooms that meet ADA requirements. The Coalition would like to see more specific goals or objectives related to these recreation sites.

In addition, the FGNRA Management Plan fails to recognize one major challenge to implementing the Plan direction – declining budget and declining workforce. *See* FGNRA Management Plan at 4. This concern was raised by the Coalition during scoping and during cooperator meetings. While the Management Plan speaks to working collaboratively with state and local governments and interested stakeholders to upgrade existing infrastructure, the Coalition would like to see more emphasis in the management direction for actively seeking out funding for recreation and infrastructure maintenance/improvement. More specifically, the Coalition would like to see the Management Approach #15 be identified and revised as a Goal to give it more effect and weight. It could be revised to state: “Use collaborative partnerships, mutual interest cost sharing, and shared stewardship work to expand and enhance the funding for and management of recreation sites and infrastructure.”

IV. OBJECTION TO LIVESTOCK GRAZING MANAGEMENT DIRECTION

The Coalition members worked with the Forest Service during the Ashley National Forest LMP revision on the language for the livestock grazing management direction and continue to support it. However, the Management Plan does not provide any additional direction for the FGNRA except the Management Approach of continuing the MOU with the Bureau of Land Management to manage livestock grazing permits in the FGNRA. FGNRA Management Plan at 54. The Coalition raised this issue during scoping. The Coalition would request that the Forest

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Service include language that explains that the BLM's management of the grazing permits on the FGNRA would be consistent with and follow the management direction from the Ashley National Forest LMP.

V. OBJECTION TO SPECIAL LAND USES GUIDELINE 02

The Coalition objects to the prohibition of new utility transmission infrastructure in the FGNRA outside of designated utility corridors. FGNRA Management Plan at 52 (Special Land Uses Guideline 02). The Coalition would agree that the designated utility corridors should be the location for new utility transmission infrastructure, but that the Plan should not completely prohibit new utility locations if they do not interfere with existing recreational sites or conflict with the purposes of the FGNRA. It is important to allow for the construction of necessary transmission infrastructure, even if it is outside existing corridors, if it would support the Flaming Gorge Dam, the Powerplant, or any other new energy developments.

VI. CONCLUSION

The Coalition members appreciate the Forest Service's consideration of these objections and the continued collaboration on the management of the FGNRA. The Coalition looks forward to working with the Forest Service on these objections and any others that have been submitted.

Sincerely,



Eric South, Chairman
Wyoming Coalition of Local Governments