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Comments: Greater Little Mountain Coalition November 7, 2019 Submitted via

Spending, 2015 For the Sweetwater County Commissioners University of Wyoming, Department of Agricultural & Applied Economics David T. Taylor& Thomas Foulke September 2016 General comments/Flaming Gorge NRA The scoping document is incomplete, often confusing and doesn't appear to follow the 2012 Forest Planning Rule<sup>2</sup>. The desired conditions in the plan are incomplete and many have no objectives and only a few have guidelines. The final directives for desired conditions and objectives, found in WO Amendment 1909.12-2015-13 outlines the assessments needed following the guidelines of the Land Management Planning Handbook. For example, at least 38 of the resources have no identified objectives.<sup>2</sup> DEPARTMENT OF AGRICULTURE Forest Service 36 CFR Part 219 RIN 0596-AD02 National Forest System Land Management Planning AGENCY: Forest Service, USDA. ACTION: Final rule and record of decision.<sup>3</sup> WO AMENDMENT 1909.12-2015-1 FSH 1909.12 - LAND MANAGEMENT PLANNING HANDBOOK CHAPTER 10 - ASSESSMENTS The Forest Plan must be enhanced with additional Objectives, Standards, Guidelines, and Suitability of Lands components for riparian management zones, coldwater fisheries, terrestrial vegetation, forest vegetation, non-forest vegetation, wildlife, recreation settings and opportunities of the Flaming Gorge NRA. The draft Forest Plan does not include any science-based discussion of the challenges presented by continuing climate change. The recreational values (and related desired conditions and objectives) of the Green River, both above and below Flaming Gorge NRA is nearly absent from the draft Forest Plan. Coordination with Sweetwater County Commission, Wyoming Game and Fish Department, state of Wyoming and others is needed to reflect a significant economic analysis included in the plan. The draft Forest Plan has no discussion of coordination between Utah and Wyoming wildlife management agencies. Coordination is critical to maintain consistent standards and monitoring for conserving and protecting fish and wildlife resources. Each species of conservation concern needs to have its own section within the Forest Plan, not just interspersed in the resource sections. For instance, Colorado River cutthroat trout are only mentioned a couple times in the Watershed section. Water Resources/Riparian Reviewing the draft plan, the Riparian section needs to be more robust and include discussion and desired conditions for all water-related areas. Water is more valuable than gold to sustain Western landscapes, economies, the human environment and fish and wildlife resources. The western flank of the GLMA contains numerous direct tributaries to Flaming Gorge Reservoir, a part of the Upper Colorado River system and a vitally important upstream watershed recharge area for this entire system. Salinity and increased sediment load are already a huge concern for this system. Any released sediment or contaminates, both above and below ground, could move directly into Flaming Gorge Reservoir harming a multimillion-dollar National Recreation Area and water supply for seven state beneficiaries of the Upper Colorado River Compact. Any disturbance of the unstable soils and slope characteristics of the area has the potential to modify aquatic habitat characteristics of waterways and adversely affect aquatic populations and diversity of fish habitat. Multiple springs, perennial and ephemeral streams, fens and wet areas are associated with the eastern boundary of Flaming Gorge Reservoir and suggest that deeper regions of shallow groundwater may be encountered with any disturbance and development. Energy Development The Coalition does not support any new fluid or extractive mineral development in the Ashley National Forest planning area bounded by Flaming Gorge Reservoir and the GLMA. The Coalition's Management Proposal 4, submitted to the Wyoming Bureau of Land Management Rock Springs Field Office, includes a recommendation of NSO on BLM lands (Figure 2). The Ashley NF land that bounds Flaming Gorge to the east and the GLMA to the west is a critical buffer and is not the right place for energy development. The risks of development on the shores of Flaming Gorge greatly out-weigh any benefit of disturbing this landscape and it should be left alone to not jeopardize downstream users and for public safety and health.<sup>4</sup> Greater Little Mountain Coalition Alternative for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision submitted December 14, 2018. [See attachment for: Figure 2. Proposed Greater Little Mountain Resource Areas and Management Prescriptions.] In fact, the draft Forest Plan needs to include mineral exploration directives and a robust suitability analysis and planning direction for oil and gas development, and NOT rely merely on the 1997 Western Uintah Basin Oil and Gas Leasing EIS. The draft Forest Plan must include language that does not allow any lands available for oil and gas leasing that were not included in the 1997 Western Uintah Basin EIS, including the Flaming Gorge NRA and the Green River district. The plan must clearly state that without a site-specific leasing decision, lease nominations cannot and should not be considered. The Forest Plan needs to consider a full range of alternatives in the analysis, especially for the Flaming Gorge NRA and the Green River district. Any future Right of Ways (ROWs) for alternative energy sources and pipelines should be excluded in the Flaming

Gorge NRA including the following: Commercial scale wind farms and solar farms; electrical transmission lines (not service lines) and oil and gas transmission pipelines. This is consistent with the congressionally stated purpose of the Flaming Gorge National Recreation Area (Public Law 90-540-Oct. 1, 1968), and it is consistent with Sweetwater County BLM RMP comments for adjacent lands contained in the GLMA. (See SWCO comment #23 and #24 in Ashley Comment Review Chart Oct. 2018). Summary The Coalition is committed to protecting, restoring and conserving the unique fish and wildlife habitat values of the diverse GLMA bounded by the Ashley National Forest. In addition to the comments above, we look forward to working through the planning process and appreciate this opportunity to participate and anticipate working cooperatively with the Forest as this process evolves.

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