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Comments: TU Comments Ashley NF Draft Plan Revision.pdf **TEXT FROM THIS ATTACHMENT IS INCLUDED BELOW**

From: Andrew Rasmussen <Andrew.Rasmussen@tu.org>
Sent: Thursday, November 7, 2019 1:29 PM
To: FS-Comments Intermtn Ashley ForestPlanRevision
Subject: TU comments for Ashley NF Draft Plan Revision
Attachments: TU Comments Ashley NF Draft Plan Revision.pdf

Please see Trout Unlimited's attached comments for the forest planning team re: the Draft Plan revision; Please confirm receipt. Thank you.
Andy Rasmussen
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Comments emailed to: AshleyForestPlan@fs.fed.us
Cathleen Neelan
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Dear Planning Team,

Trout Unlimited (TU) would like to thank you for the opportunity to submit comments on the revision of the Ashley National Forest Management Plan (Draft Plan). The forest plan revision process is an important public process and we appreciate the opportunity to provide our input. Our interests in the Ashley National Forest (ANF) stem from the high interest and use from anglers, hunters, and outdoor enthusiasts who enjoy the distinct and diverse landscapes of the ANF.

Trout Unlimited is a non-profit conservation organization with more than 300,000 members and supporters nationwide. Our mission is to conserve, protect and restore North America's trout and salmon fisheries and their watersheds. Trout Unlimited recognizes the value of public lands is unparalleled in providing habitat to coldwater fisheries, drinking water, wildlife habitat and public recreation opportunities.

Trout Unlimited has a strong base in Utah with approximately 1,800 members associated with eight chapters throughout the state. Near the Ashley National Forest (ANF), we have three TU Chapters (High Desert Anglers-UT, Seedskadee-WY, and Upper Bear River-WY) whose members use the ANF for a wide array of activities. These volunteer members have been active for years in coldwater fisheries projects on and near the ANF and throughout Utah. In addition, TU staff have invested in restoration and protection projects on public lands that include partnering with USFS and state agencies.

Involvement in the forest planning process is an important part of our conservation efforts and we value its importance in helping to conserve important landscapes and habitat, provide multiple use opportunities, and as home for a variety of aquatic and terrestrial species.

Sportsmen have a clear stake in the management direction, strategy, and priorities that may derive from the Forest Plan revision process. We appreciate that the Forest Service has encouraged public involvement, through various meetings and interactive websites, to create a Forest Plan that reflects the interests of the forest users. Trout Unlimited believes that the actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

We understand the revised Forest Plan will supersede the 1986 Ashley NF Plan and any amendments. As participants during the 2012 Planning Rule process, we support the new Rule's goals for the Forest Plan revision, which include:
- Maintain and, where appropriate, restore ecosystem and watershed health and resilience (ecological integrity),
- Protect key resources in the Forest, including water, air, and soil,
- Address water quality and riparian area protection and restoration.

Trout Unlimited has several concerns with the Draft Plan and we remain committed to participation in this process. Two years ago, I provided comments on the Draft Assessment. At that time I identified TU's primary concerns as,
1) Protecting the valuable coldwater watersheds, riparian ecosystems, and their resident native trout populations, and maintaining pristine water quality (surface and ground)
2) Ensuring a robust, science-based discussion of the challenges presented by continuing climate change, and
3) Providing input in where and how oil and gas assets will be developed.

I will structure these comments around those same priorities and add a fourth consideration: critical economic values of the Green river and Flaming Gorge for ANF.

Watersheds, Aquatic, & Riparian Ecosystems

Grazing Practices

Riparian areas provide critical habitat for fish and wildlife. By acting as buffers between upland areas and open water, they help filter pollutants such as nutrients and sediment. Healthy riparian vegetation helps to reduce stream bank erosion and maintain stable stream channel geomorphology. Vegetation also provides shade, which works to lower water temperatures.

The current Draft revision Plan does not adequately address the importance of these areas, specifically and especially the effects grazing can have on riparian health. Livestock grazing can have multiple negative effects on riparian areas including reduced vegetation, channel widening, reduction of cover, water temperature increase, increases in sedimentation, loss of habitat, and reduction in water quality (AFS Policy Statement #023). This damage can cause a reduction or possible loss of fish species (AFS Policy Statement #023).1
1 American Fisheries Society (AFS) Policy Statement #023. The Effects of Livestock Grazing on Riparian and Stream Ecosystems.

The Draft Plan Revision offers an opportunity to use existing data to identify riparian areas that have been negatively affected and rehabilitate these areas as well as identify crucial riparian habitats that should be protected through changes in grazing practices that will adequately protect riparian corridors. Resolution of grazing conflicts does not usually mean elimination of grazing, but rather managing livestock in conformance with

other recognized uses of riparian areas. Grazing practices to manage the timing, duration, season, and recovery period use could help to ensure future riparian zone health (Swanson et al. 2015).2 There are myriad studies discussing how management practices could be used to benefit riparian areas and their philosophies could be implemented into the Final Plan Revision.

2012 Planning Rule Adherence

It is notable and commendable that all the watersheds in the ANF rate as good or fair, and that no watersheds were evaluated to be in poor condition. Trout Unlimited recommends continued and extensive monitoring to maintain the overall health of the resource.

As previously mentioned, two of the primary purposes of Forest Plans under the 2012 Planning rule are to maintain and, where appropriate, restore ecosystem and watershed health and resilience, and to protect key resources in the Forest, including water, air, and soil. To that end the 2012 Rule establishes "Every plan must include the following plan components:

(i) Desired conditions[hellip] Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined, but do not include completion dates.
(ii) Objectives. An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions[hellip]
(iii) Standards. A standard is a mandatory constraint on project and activity decisionmaking, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, [hellip]
(iv) Guidelines. Guidelines are established to help achieve or maintain a desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements[hellip]
(v) (see below)
(vi) Optional plan component: goals. A plan may include goals as plan components[hellip]3

Surprisingly, Trout Unlimited notes thirty-eight topics in the Draft Plan with zero Objectives listed; and several others have inadequate Objectives or Standards to effectively monitor progress toward the stated Desired Objectives. In fact, on page 2 of the Draft Plan Revision we note the following, "There is no requirement that every topic have plan components and not every type of plan component is included for every topic." This statement appears contradictory to the passages cited above from the 2012 Planning Rule. TU respectfully requests clarification or correction on this point.

2 Swanson, S. R., Wyman, S., & Evans, C. (2015). Practical grazing management to meet riparian objectives. Journal of Rangeland Applications, 2, 1-28.
3 2012 USFS Planning Rule, Title 36 [sect] 219.7 (e)

Species of Concern

We are pleased to note that the Draft Plan Revision lists Colorado River Cutthroat Trout (CRCT) as a species at risk. However, as with many such listed species, CRCT are only mentioned a handful of times in the watershed portion of the document. TU recommends each species of concern have a separate section within the plan which details Desired Conditions and Objectives for maintaining or strengthening that species on the ANF.

For CRCT specifically, such conditions and guidelines may come from sources such as The Conservation Agreement for Colorado River Cutthroat Trout4 (2006). This is a collaborative and cooperative effort among resource agencies to eliminate or reduce threats to CRCT that warrant listing as special status species by state and federal agencies.

Colorado River cutthroat trout (CRCT) are the only cutthroat trout species native to the Uinta Mountains and the ANF. The CRCT historically occupied numerous tributary systems in the Uinta range. The Conservation Agreement (CRCT Agreement) and the associated Colorado River Cutthroat Trout Conservation Strategy (CRCT Strategy) are documents that both the Forest Service and BLM are signatories to and committed to implementing.

In Utah, the most recent CRCT Range-wide Assessment estimates that CRCT occupy only 20% of their original historic habitat.5 The Strategy requires protecting both existing and potential habitat and requires agency land use plans to reflect protection strategies. The CRCT Strategy states:

"Land management agencies agree to protect existing and potential cutthroat waters from adverse effects of other land uses and to consult with wildlife agency biologists on forest plans, permit processes, and other proposed activities to avoid or minimize potential negative impacts. Signatory agencies will ensure that their planning documents are consistent with this Strategy." (CRCT Conservation Strategy, at page 20.)

While much of the CRCT habitat in the ANF is good, there are areas where erosion caused by overgrazing and unauthorized off-road vehicle use have impacted their habitat by adding sediment to streams. In addition, the potential for habitat degradation from increased mineral development and climatic changes could significantly affect the long-term viability of CRCT throughout their historic range (see comments below).

4 CRCT Conservation Team. 2006. Conservation agreement for Colorado River cutthroat trout (Oncorhynchus clarkii pleuriticus) in the States of Colorado, Utah, and Wyoming. Colorado Division of Wildlife, Fort Collins. 10p.
5 Hirsch, C.L., M.R. Dare, and S.E. Albeke. 2013. Range-wide status of Colorado River cutthroat trout (Oncorhynchus clarkii pleuriticus): 2010. Colorado River Cutthroat Trout Conservation Team Report. Colorado Parks and Wildlife, Fort Collins.

Trout Unlimited urges more robust consideration for maintaining areas currently supporting CRCT conservation populations and will continue to partner with the ANF to identify additional opportunities to increase distribution of CRCT throughout their native range.

Invasive Species

The Draft Plan Revision is lacking in specific Desired Conditions, Objectives, or standards for some invasive species. For instance, Chytrid Fungus is one of the major drivers of amphibian decline worldwide (Daszak et al 2003).6

The fungus infects amphibians and lives inside the cells in the outer layer of their skin, causing the skin to thicken. This thickening prevents water absorption and oxygen exchange as well as disrupts the ionic balance in the blood systems of an amphibian. Climate change is thought to compound the effects of disease. As this disease is having large effects on amphibians around the world it should be included in the forest plan revision. The plan could include monitoring strategies and how the state management agencies can be included to help monitor both prevalence and spread of this disease. The plan should also consider how to minimize the spread of this disease through various cleaning and sterilization processes.

Additional suggestions and potential language

TU also recommends consideration of the following in the Watersheds and Aquatics sections of the Final Plan Revision:

TU would like to see a more thorough assessment of the groundwater situation, its larger role on the forest for

stream connectivity, particularly given the character of groundwater in the ANF, with several sinking and disappearing streams, caves, sinkholes, and springs. A few recommendations we offer the ANF to consider implementing in the Final Plan Revision include:

- Continue to identify current watershed conditions, challenges and best management practices to protect these areas in the future. Again, TU recognizes the overall good health of ANF watersheds, but the planning process should include stipulations to keep them from impaired functioning in the future.
- Review current (and most likely outdated) stipulations which protect fish and wildlife resources and update accordingly. Increased stipulations for stream and river buffers should be applied especially in sensitive watersheds.
- We support the use of the Forest's Watershed Condition Framework and its role in the plan revision. The tools identified within the Framework can be applied to new 2012 Forest Planning Rule concepts such as landscape level connectivity and watershed health. We encourage the ANF to provide a robust review and application of this option.

We encourage a prudent discussion in the Final Plan about potential trans-basin diversions from the Flaming Gorge Reservoir to the front range of Colorado, as well as increasing calls for water from downstream states in the Colorado River Compact. The Final Plan should contain at least one Desired Condition relative to minimum reservoir levels in Flaming Gorge for ecological sustainability in and around Ashley National Forest, especially during drought years.

6 Daszak, P., A. A. Cunningham, and A. D. Hyatt. 2003. Infectious disease and amphibian populations declines. Diversity and Distribution 9:141-150.

Maintaining sufficient water supplies in Flaming Gorge Reservoir necessary to buffer the water supply needs of Flaming Gorge biological communities, recreational demands and downstream water commitments is critical. As is consideration of tributary salinity contributions to the Flaming Gorge and the Green River System and the need for salinity control projects on tributaries such as the Henry's Fork.

Finally, we offer specific potential language for additional Desired Conditions and Objectives in the Watersheds and Aquatic, and Riparian Ecosystems section (chapter 2) of the Final Plan Revision. As we reviewed language in other forest plans and other cooperator comments, we found several suggestions of recurring and sample language we would like to emphasize, including:
Page 14 (Draft Plan Revision) - Revise Desired Condition: Connectivity of habitat for native and desired nonnative fish and aquatic species is maintained or enhanced by the design and implementation of project specific actions. Populations are expanding into previously occupied habitat, and interconnectivity is maintained within metapopulations. To maintain sustainable populations, critical life stages are distributed and abundant.
Pg 14 - Add Desired Condition: Habitat and water quality in lakes and streams allow fish populations to thrive, and habitat is not fragmented by management activities.
Pg 14 - Add Desired Condition: Stream alterations (such as culverts and water crossings) do not exclude aquatic species from their historic habitat or restrict seasonal and opportunistic movements. Barriers to movement may exist to protect native aquatic species from nonnative aquatic species or for agricultural benefit.
Pg 15 (Aquatics & Fisheries) - Add Guideline: Activities in and around waters should use decontamination procedures to prevent the spread of chytrid fungus and other pathogens that are harmful to aquatic wildlife.
Pg 14 - Add Guideline: Heavy equipment and vehicles used for instream restoration management activities shall be free of petroleum-based fluid residue and not leak.
Pg 16 - Revise timing Guideline to protect spawning Colorado River Cutthroat trout (CRCT) management activities that have the potential to directly deliver sediment to habitat should be limited to times outside of spawning and incubation seasons (May-August). This window, while appreciated, is inadequate. Instream construction should be restricted March 15-July 31 to minimize impacts to Colorado River Cutthroat Trout and Rainbow Trout spawning.

Pg 16 - Add Guideline: Avoid the movement of water from one drainage to another drainage to prevent aquatic invasive species and disease transfer. If equipment has been used in an area known to contain aquatic invasive species, the equipment will need to be inspected by an authorized aquatic invasive species inspector certified in the State of Wyoming prior to use in any Wyoming water. If aquatic invasive species are found, the equipment will need to be decontaminated following WGFD procedures. If water has been moved from one drainage to another drainage, WGFD will be contacted so that WGFD can begin a monitoring program.
Pg 16 - Add Management Approach: Management activities should retain trees, snags, and downed logs in and near stream channels and riparian areas to provide for stream stability, wildlife habitat, and recruitment of large woody material as appropriate to the stream type.
Pg 16 - Add Guidelines: In order to maintain bank stability on perennial and intermittent streams, new or redesigned stream crossings (such as bridges and culverts) should be wide enough to pass the bankfull width unimpeded to protect stability and function of streams.
Pg 16 - Add Guideline: During stream restoration emphasize natural channel design principles over construction involving artificial materials.
Pg 17 - Add Guideline: As projects occur in riparian management zones, unneeded roads should be closed or relocated, drainage restored, and native vegetation reestablished to move these areas toward their desired condition.

Riparian Buffers

Finally, relative to the restrictions around management activities in and around streams and riparian areas, federal land management field offices across the West were incorporating increased riparian and stream buffers into newer Forest Plans and RMP decisions, ranging from 500-foot buffer stipulations being applied to perennial streams and up to one-half mile buffers applied in sensitive native trout habitat (Billings RMP in Montana and Little Snake RMP in Colorado as two examples). This trend for stronger buffers is increasing not just in BLM but within revised U.S. Forest Service plans as well. In Utah's Dixie National Forest Final Land Use Plan (2011), a 500-foot NSO buffer is applicable for all suitable native trout reintroduction habitat. And in Utah's Uinta National Forest impacts from oil and gas leasing were recognized in needing stronger protection stipulations to protect the value of the assortment of Utah's watershed resources.7

At a minimum, Trout Unlimited considers 500-feet to be the minimum buffer that should be applied to management activities within a restricted time widow (ex: for spawning) and for other surface disturbing activities such as those associated with oil and gas development near coldwater fisheries.

However, particularly for permanent surface disturbing activities, we encourage language in the Final Plan that applies stronger buffers exceeding 500-feet and generally recommend a one-quarter mile buffer where native trout habitat exists.

Stronger buffers will help curb permanent damage before it occurs and represent responsible, science-based management.8

7 U.S. Forest Service. Record of Decision for the Uinta National Forest Oil and Gas Leasing, February 2011. Where the ROD recognized the impacts to water resources including wetlands, floodplains, riparian areas, surface water and groundwaters, new NSO and CSU stipulations were applied at the leasing stage to specifically protect these watersheds. ROD- 15-16 and Appendix H: Lease Stipulations.

Climate Change Impacts

The Draft Plan Revision provides limited information relating to climate change impacts on the forest and region. Brief mention of climate change leaves considerable gaps in both data and analysis.

Climate change will both directly and indirectly affect Ashley National forest and as such needs to be addressed in the Draft Plan Revision. Projected increases in drought, wildfire, and invasive species, as well as changes in the geographic ranges of species, will likely threaten native forests in the Southwest (USGCRP 2014).9

Changes in precipitation and timing of run-off could affect water resources both on and off the forest. As temperature increases species will likely need to move to higher elevations to find suitable conditions. This increase in temperature will also increase the potential of invasive species establishment (Pauchard et al 2016).10 Aquatic species may be adversely affected by increasing temperatures due to barriers limiting movement or the overall lack of mobility by a specific species (i.e Tiger Salamander, Forero-Medina et al. 2011).11

The Final Plan Revision for ANF should use tools such as the Template for Assessing Climate Change Impacts and Management Options (TACCIMO), or a similar tool, to truly understand what impacts may occur on the Ashley National Forest in the future. The information from these tools can then be used to develop adaptive management strategies such as how to deal with invasive species spread, or how to conserve native amphibian species which could be highly susceptible to climate change can then be incorporated into the forest plan revision. Trout Unlimited's own research has illustrated ways in which providing a diverse portfolio of management approaches may lower the risk of habitat loss, and in the case of our interests in coldwater fisheries, ensure that long term persistence of native trout are maintained.12

8 Eaton, Timothy T. Science-based decision-making on complex issues: Marcellus shale gas hydrofracking and New York City water supply. Science of the Total Environment 461-46 (2013) 158-169. http://seesdept.social.qwriting.qc.cuny.edu/files/2017/09/Eaton13STE-paper- 2017.pdf ; McBroom, Matthew et al. 2012. Soil Erosion and Surface Water Quality Impacts of Natural Gas Development in East Texas, USA. Ecological Watershed Management. Water 2012, 4(4), 944-958. https://doi.org/10.3390/w4040944; Conservation Tools.org. The Science Behind the Need for Riparian Buffer Protection. https://conservationtools.org/guides/131-thescience- behind-the-need-for-riparian-buffer-protection.
9 USGCRP (2014). Garfin, G., G. Franco, H. Blanco, A. Comrie, P. Gonzalez, T. Piechota, R. Smyth, and R. Waskom, 2014: Ch. 20: Southwest. Climate Change Impacts in the United States: The Third National Climate Assessment, J. M. Melillo, Terese (T.C.) Richmond, and G. W. Yohe, Eds., U.S. Global Change Research Program, 462-486.
10 Pauchard, A., Milbau, A., Albihn, A., Alexander, J., Burgess, T., Daehler, C., ... & Haider, S. (2016). Non-native and native organisms moving into high elevation and high latitude ecosystems in an era of climate change: new challenges for ecology and conservation. Biological invasions, 18(2), 345-353.
11 Forero-Medina, German., Joppa, L., & Pimm, S. L. (2011). Constraints to species' elevational range shifts as climate changes. Conservation Biology, 25(1), 163-171.

While the Assessment would benefit from a more vigorous treatment of climatological science and the impacts of potential climate change on ANFresources, a gap of primary importance to TU is related to water[mdash]stream temperatures, community water needs and greenhouse gas levels. All impact water

There is enough science on watershed protections and climate change adaptation tools available now that can help modify the dire trends we are seeing. Additionally, increasing temperatures, drought, and fuel loads will continue to present management challenges not only for watersheds, but for ANF vegetation. This may incur catastrophic costs as more trees are killed by insects and disease and the risk of large, uncharacteristic fires increases.

At a minimum, the Final Plan should incorporate stream temperature monitoring activities that allow for the detection of changes that are occurring. The forest service revision plan allows for a proactive approach to

climate change and how management can help mitigate its effects.

Additional considerations for the EIS and Final Draft Revision include a robust climate change review and explicit discussion of opportunities to address lowering these risks. A few recommendations include:

- A full review and documentation of resources impacted by climate change, including water. Water is a resource and a commodity and is used, like timber, fuels, etc., by livestock industry, municipalities, recreationists, and of course fish and wildlife.

- Include a discussion with management options for dealing with the water (and groundwater resources) management challenges mentioned in the 2017 Draft Assessment. These options should bring new and traditional stakeholders to the table in helping to incorporate better water resource management. The use of volunteers, nonprofit organizations, citizen science use, and land users to help improve landscape and watershed health should be a top priority, especially in times of stressed budgets and lack of staff.

- Trout Unlimited feels privileged to be partners with the Forest Service through volunteer and citizen science projects. We believe these grassroots collaborations are the heart and soul of our organization and they are in no short supply on national forests in Utah. Under the plan revision process, werecommend the prioritization of citizen science contributions, but also for an internal monitoring and feedback structure that provides accountability and continuity for understanding the data obtained through the volunteer citizen science program. We want to be sure that the work contributed through the citizen science program is valuable, useable, and provides an opportunity to critique the process of those contributions.

12 Haak, Amy, Williams, Jack and Dauwalter, Dan. "Developing a Diverse Conservation Portfolio for Colorado River Cutthroat Trout". 2011. Trout Unlimited. www.tu.org. ; Williams, JE, et al. 2015. "Cold-water Fishes and Climate Change in North America." In Reference Module in Earth Systems and Environmental Sciences (2015). P. 1. http://dx.doi.org/10.1016/B978-0-12-409548-9.09505-1.

Mineral Development

As we noted in our comments on the 2017 Draft Assessment, Trout Unlimited is disappointed to see the lack of mineral exploration directives reflected in the ANF Draft Plan Revision. The Draft Plan states that management of mineral resources is "guided and bounded" by laws, regulations, agencies, and market forces external to ANF and its planning process.

The primary statement of mineral management intent is, "Until an updated oil and gas leasing analysis for the Ashley is available, that guidance (established in the 1997 Western Uintah Basin Oil and Gas Leasing EIS) will continue to be followed."13

Trout Unlimited encourages a much more comprehensive suitability analysis, including directives that make it clear in the plan how energy and mineral development will be accessed and managed. Of particular concern are the numerous oil and gas leases on the Duchesne-Roosevelt South unit and the large suspected oil shale deposits within the Green River Formation in the Flaming GorgeDistrict. The existing Ashley National Forest Plan has classified the national forest lands within the Flaming Gorge National Recreation Area as unavailable for oil and gas development or subject to No Surface Occupancy restrictions. Because the importance of the Flaming Gorge to big game and other wildlife, Trout Unlimited request that the public lands within the National Recreation Area remain unavailable to fluid mineral development and mineral exploration and extraction.

Under the 2012 Planning Rule, land management decisions regarding oil and gas suitability and leasing availability analysis can be made concurrently as part of the plan development.14 The Forest clarified under the

Rule the relationship between oil and gas leasing decisions and the land management planning process by stating: The relationship between oil and gas leasing analysis and the land management planning was modified from the proposed directive and is described in FSH 1909.12, chapter 20, section 23.23i.

The Forest Service decision regarding which lands are available for oil and gas leasing is supported through preparation of a leasing availability analysis. A leasing analysis may be for all or portions of a plan area. The leasing availability decision may be as part of the plan, as a separate decision concurrently with the plan, or as a decision that may occur subsequent to the plan decision. The difference in scope, proposed action, and level of detail between a planning effort and a leasing analysis must be made clear should a single NEPA analysis document be used to support both the plan and oil and gas leasing availability decisions. Oil and gas leasing availability decisions must be consistent with the applicable land management plan.15

13 ANF Draft Assessment Report, Energy & Mineral Resources subsection, p. 90
14 USFS 2012 Planning Rule. http://www.fs.fed.us/im/directives/fsh/1909.12/wo_1909.12_20.docx. See 23.23(i), page 110. See also: (v) Suitability of lands. Specific lands within a plan area will be identified as suitable for various multiple uses or activities based on the desired conditions applicable to those lands. The plan will also identify lands within the plan area as not suitable for uses that are not compatible with desired conditions for those lands. The suitability of lands need not be identified for every use or activity. Suitability identifications may be made after consideration of historic uses and of issues that have arisen in the planning process. Every plan must identify those lands that are not suitable for timber production ([sect] 219.11)
15 http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3828565.pdf see page 59.

With the variety of hard rock and mineral development occurring and potentially occurring on this Forest, it becomes increasingly important to provide a thorough analysis, including an updated reasonably foreseeable development scenario. A concurrent increase in water demand, recreation demand, and other multiple userssuch as livestock operators, means providing a well-designed leasing and development plan that clearly directs short-term, mid-term and long-term future forest use.

Due to the increase in oil and gas development across the West in the past 20 years, much research has been undertaken to determine the level of impacts associated with energy development. We encourage the ANF to review available research and new management options for protecting and minimizing impacts to fish, wildlife, air, and water resources.

Trout Unlimited is committed to working with agencies and industry to find ways to support oil and gas development in a way that protects hunting and fishing resources, water quality, and long-term sustainability of the delicate ecosystems of the ANF. Such development follows several good precautionary measures, design criteria, mitigation measures, and implementing Best Management Practices (for both large and small operators) to mitigate potential negative environmental impacts.

Pipeline Rights-of-Way

To help protect the Flaming Gorge from potential water pollution, TU strongly recommends adding language that would protect the world class fisheries in Flaming Gorge and that would prohibit pipeline corridors or rights-of-way within the Flaming Gorge National Recreation Area (FGNRA). The risks of breakage and spillage inherent with pipelines would create an untenable threat to the Flaming Gorge fishery and downstream ecosystems and users. TU is ready to work with the various stakeholder in identifying alternate pipeline corridors and rights-of-way.

Recreational Values

There is almost no mention in the Draft Plan Revision of the recreational values (with related desired conditions

and objectives) of the Green River, both above and below Flaming Gorge. Recreation on this river is, in many ways, the lifeblood of the entire forest.

Under the Social and Economic section (pg 36) Trout Unlimited strongly recommends the inclusion of, or directions for, a significant impact study which analyzes the economic and social impacts of both the Green river and Flaming Gorge on the Forest and surrounding communities in both Utah and Wyoming.

Dispersed Recreation Trends

Regarding both the motorized and non-motorized dispersed recreation types referenced in the Draft Plan Revision: since both of these recreation types rely on roads, trails and two tracks that cross adjacent public and private lands, it is important that the Final Plan make a reference to the necessity of coordinating roadway maintenance and access with both private and public land owners. This may also help reduce unauthorized off-road vehicle use.

Conclusion

Trout Unlimited is committed to protecting and restoring the unique fish and wildlife habitat values of the diverse Ashley National Forest. We appreciate this opportunity to participate in this planning process and anticipate working cooperatively with the Forest moving forward.

Please feel free to contact me with any questions.

Sincerely,
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