

Data Submitted (UTC 11): 11/8/2019 7:00:00 AM

First name: Joe

Last name: Budd

Organization: State of Wyoming

Title:

Comments: Cathleen and Lars,

Attached are the State of Wyoming's comments on the Ashley National Forest Plan Revision. There should be two attachments; one is a cover letter from Governor Gordon and the second is specific comments from state agencies, consolidated for your convenience into a table. Please note: the table is an attachment to the Governor's letter and is part of Wyoming's comments, not separate (incorporated by reference here and in the cover letter).

If you have any questions regarding the materials or any issues opening the attachments, please let me know immediately. We are looking forward to discussing things with you and your staff. Thank you,

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November 8, 2019

Cathleen Neelan Forest Plan Team Lead

Ashley National Forest

355 N011h Vernal Ave Vernal, UT 84078

Dear Ms. Neelan,

Thank you for the opportunity to comment on the Ashley National Forest (ANF) Land Use Plan Revision process (Revision). This is the most important National Environmental Policy Act (NEP A) process any forest can undertake, as it will serve as the basis for virtually all ANF projects, programs and actions moving forward. I urge the ANF to be diligent in revising the plan and take the necessary time to complete a robust and thoughtful analysis with engagement of the public, counties, local government, and state agencies.

With regard to the documents provided by ANF, state agencies have spent over a year working with the forest in an attempt to develop clear and reasonable changes to the forest plan. However, multiple concerns still exist and must be addressed. The state agencies have completed in-depth analyses of the provided documents and their specific comments are included with this letter. Although this represents the Scoping period, the agencies have gone into detail and have reiterated comments to help the ANF deliver more complete documents during the next

comment period. In addition to the specific comments from the agencies, I would offer the following items for your consideration:

1. Engagement with state agencies and tribes, from both Wyoming and Utah, is paramount. They have special expertise in multiple areas, statutory requirements, Memoranda of Understanding detailing Cooperating Agency status, and federal regulations dictate engagement. I encourage the ANF to engage early and often, as outlined by the Council on Environmental Quality guidance found at 40 CFR ISO 1.2. Not only does Cooperator engagement improve agency planning, it helps the ANF develop plans that reflect local realities, values, avoids delays later in the process, and helps to head off potential conflicts.

2. The ANF must consider a full range of alternatives and should look to specific comments to aid in this part of the process. Specific comments from the agencies can aid in alternative development and could be replacements for existing items or partes) of a new alternative. Agencies have also identified items that are not currently in documents and should be added. It is extremely important the ANF remains cognizant of the role details and specific language play in the forest plan. I would recommend ANF begin by reviewing comments labelled "General Comment" by the agencies and then delve into details on each section.

3. Structure the plan in an easily digestible format. As currently structured, the plan is lacking key components in multiple areas. Additionally, there is interchange between standards and guidelines in multiple resources that is inconsistent and confusing. For example, guidance for some species, which appears to better fit the wildlife section, is found in the riparian section. Similarly, there is a large degree of variability given to each resource area. Including the background and introduction sections (e.g., the Wildlife section is comprehensive, and contains a suite of objectives, standards, guidelines and goals. While the Cultural Resources section is extremely limited). Finally, Appendix B, entitled "Management Approaches", does not appear to contain true Management Approaches as defined on page four ofthe Proposed Plan and the ANF's variable use of the term "management actions" appears to conflict with guidance in handbooks and manuals. Many of the Management Approaches are actually objectives or guidelines. We recommend a thorough review Appendix B and ensure consistency in the proposed plan.

4. Give proper weight to local experts, such as counties and municipalities. Portions of the ANF, such as Flaming Gorge National Recreation Area, are major components of county and city portfolios and setting. The ANF document lacks detail regarding how the Forest Service will partner with local governments to maintain or contribute to their economic diversification efforts. ANF should give full consideration to their input on items that can impact local economies by reaching out to local governments to better understand the concerns and values ofthese assets and how a partnership can maximize the recreation and economic benefit from these resources. Additionally, the ANF should seek to align a revised Forest Plan with county land and resource plans, and state plans whenever possible.

My office will continue to be engaged in this process and is always available to help the ANF with the Revision effort. Carefully review the specific comments from the state agencies; they are the experts on the issues they raise and can be an invaluable asset to the ANF in this process.

Thank you again for the opportunity to provide input and I look forward to continued collaboration with the Ashley National Forest.

Mark Gordon Governor

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 2

Component Number: General

Existing Language: General Comment

Reccomended Language: N/A

Explanation: On Page 2 the following statement is made "There is no requirement that every topic have plan components, and not every type of plan component is included for every topic. The following description of plan components come from the 2012 Planning Rule at 36 CFR 219.7(e)." In our review of 36 CFR 219.7 (e) states "The following plan components are required: desired conditions, objectives, standards, guidelines, and suitability of lands. Goals may be included as an optional plan components." Our review of the draft plan, we have found that 38 resources (such as Riparian Management Zones, Terrestrial Vegetation, Aspen, Wildlife, Energy and Minerals, Recreation Opportunity Spectrum, and Flaming Gorge National Recreation Area) identified by ANF have desired conditions but no objectives. "An objective is a concise, measureable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives should be based on reasonably foreseeable budgets. (36 CFR 219.9 (e) (1) (ii)." We recommend that objective/s be added for these 38 resources. If the Forest Service does not believe that objective/s are needed, please explain the justification

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 2

Component Number: General

Existing Language: General Comment

Reccomended Language: N/A

Explanation: It appears the following Resource Requirements for Integrated Plan Components are missing from the plan (36 CFR 219.1(g) and Land Management Planning Handbook Chapter 20 - Land Management Plan: Water Quality and Water Resources, Species-specific Plan Components for At-risk Species, Threatened and Endangered Species, Proposed and Candidate Species, Species of Conservation Concern Renewable Energy. We recommend that these be added to the plan along with the appropriate plan components (i.e. desired conditions, objectives, standards, guidelines).

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 13-18

Component Number: Watershed, Aquatic, and Riparian Ecosystems

Existing Language: General Comment

Reccomended Language: N/A

Explanation: This section is very confusing. Plan components for watersheds, aquatics and riparian management zones are intermixed. We recommend separating plan components for watershed, aquatic/fisheries, and groundwater-dependent ecosystems.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 14

Component Number: FW-DC-WA-01

Existing Language: Watersheds and watershed features (including streams, lakes, riparian areas, and wetlands)

retain their ability to respond and adjust to disturbance without long-term, adverse effects to their physical or biological integrity.

Recommened Language: Add Desired Condition:Watersheds are functioning properly and all indicators are rated as good according to the Watershed Condition Framework (USDA 2011) or similar protocol.

Explanation:Desired condition addresses issues not identified in draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 14

Component Number: FW-DC-WA-03

Existing Language: Aquatic habitat connectivity and ecological conditions, within or between watersheds, support self-sustaining populations of native and desirable nonnative aquatic and riparian species.

Recommened Language: 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.

Explanation:Desired condition addresses issues not identified in the draft plan. Desired condition addresses all aquatic species that occur on the Forest.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 14

Component Number: FW-DC-WA-02

Existing Language: Watersheds are healthy and resilient, providing clean water for designated beneficial uses on the Ashley National Forest and for downstream communities.

Recommened Language: Add Desired Condition: Habitat and water quality in lakes and streams allow fish populations to thrive, and habitat is not fragmented by management activities.

Explanation:Desired condition addresses issues not identified in draft plan. Current desired conditions do not address habitat and water quality needs for all fish populations on the Forest.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 14

Component Number: New: Watersheds (see comment on line 7)

Existing Language: None

Recommened Language: Add Desired Condition: Properly functioning watersheds provide a wide range of sustainable ecosystem services and support multiple uses (such as timber, recreation, wildlife habitat, and grazing) in balance with healthy ecological conditions.

Explanation:Desired condition addresses issues not identified in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 15

Component Number: FW-GL-WA-01

Existing Language: New, replacement, and reconstructed crossing sites of fish-bearing streams (culverts, bridges, and other stream crossings) should allow for aquatic organism passage unless a barrier is desired to protect native aquatic species (such as Colorado River cutthroat trout) from invasion or reinvasion of a nonnative

species (such as brook trout).

Recommened Language: 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.

Explanation: We recommend this draft plan guideline be a desired condition and include stream alterations, not just to new, replacement, and reconstructed crossing sites.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 14

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommened Language: Add Desired Condition: All aquatic species populations are free from or minimally impacted (i.e. populations remain self-sustaining) by nonnative plants, animals, disease, and pathogens.

Explanation: Desired condition addresses issues not identified in the draft plan. Desired condition addresses all aquatic species that occur on the Forest

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 14

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommened Language: 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.

Explanation: Guideline addresses issues not identified in the draft plan

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 14

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommened Language: Add Guideline: Heavy equipment and vehicles used for instream restoration management activities shall be free of petroleum-based fluid residue and not leak.

Explanation: Guideline addresses issues not identified in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 16

Component Number: FW-GL-WA-02

Existing Language: To protect spawning Colorado River cutthroat trout, 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). For other fish species, mitigation such as silt fences should be used to reduce the effects from potential direct sediment delivery.

Recommened Language: Revise Guidelines: Surface disturbing activities will be avoided in the following areas: (1) identified 100-yr floodplains, (2) areas within 500 feet of perennial waters, springs, wells, and wetlands, (3) areas within 100 feet of the inner gorge of ephemeral channels.

Explanation: The revision to this guideline will minimize to a greater extent than the current guideline in minimizing sediment input into waterways.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 16

Component Number: FW-GL-WA-02

Existing Language: To protect spawning Colorado River cutthroat trout, 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). For other fish species, mitigation such as silt fences should be used to reduce the effects from potential direct sediment delivery.

Reccomended Language: Revise Guideline: Instream construction during the spring (March 15 to July 31) should be restricted to minimize impacts to Colorado River Cutthroat Trout and Rainbow Trout spawning.

Explanation: Current guideline does not adequately protect spawning trout and redds from instream construction activities. Colorado River Cutthroat Trout are one of many fish species that should be considered.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 16

Component Number: FW-GL-WA-02

Existing Language: To protect spawning Colorado River cutthroat trout, 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). For other fish species, mitigation such as silt fences should be used to reduce the effects from potential direct sediment delivery.

Reccomended Language: Revise Guideline: Instream construction during the fall (September 15 to November 30) should be restricted to minimize impacts to Kokanee Salmon and Brown Trout Spawning.

Explanation: Current guideline does not adequately protect spawning trout and redds from instream construction activities. Colorado River Cutthroat Trout are one of many fish species that should be considered.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 16

Component Number: FW-GL-WA-04

Existing Language: To prevent the introduction of aquatic invasive species, equipment that is exposed to untreated water (including drafting equipment, water tenders, and helicopter buckets) should be inspected and cleaned of aquatic invasive species according to current regional and State best management practices and directives.

Reccomended Language: 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.

Explanation: Current guideline does not meet the requirements of Wyoming Aquatic Invasive Species State statute and Wyoming Game and Fish Commission regulations

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 16

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommened Language: BOOKMARK. Add Guideline: Work with WGFD to implement the Department's aquatic invasive species rapid response plan for Flaming Gorge Reservoir.

Explanation: The Department is currently developing an aquatic invasive species rapid response plan. Plan will be completed before Ashley Forest plan revision will be completed.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 16

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommened Language: 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.

Explanation: Management approach addresses issues not identified in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 16

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommened Language: 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.

Explanation: The current Forest Service directive for new culverts and bridges just addresses fish passage. This guideline addresses fish passage and minimize impacts to the bankfull floodplain and maintains the bankfull floodplain function. Protecting the bankfull floodplain will minimize the stream from unraveling both upstream and downstream of the new culvert or bridge.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 16

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommened Language: Add Guideline: During stream restoration emphasize natural channel design principles over construction involving artificial materials.

Explanation: Guideline addresses issues not identified in the draft plan. The use of natural channel design has higher success rate than construction involving artificial materials.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 17

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommended Language: 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.

Explanation: Guideline addresses issues not identified in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 17

Component Number: New: Aquatics/Fisheries (see comment on line 7)

Existing Language: None

Recommended Language: Add Guideline: Low water crossings on roads or trails should be improved to protect water quality and stream stability. Fords on perennial streams should be a priority.

Explanation: Guideline addresses issues not identified in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 18

Component Number: Terrestrial vegetation

Existing Language: General Comment

Recommended Language: N/A

Explanation: The Ashley National Forest should provide cooperators with current conditions of native vegetation communities within the FGNRA. Providing existing current conditions of native vegetative communities allow for formulation of specific terrestrial vegetation desired conditions and objectives for the forest plan revision. If current vegetation community condition data is absent or lacking for the FGNRA, a new revised forest plan objective should be developed. This objective should focus on completing a baseline assessment of vegetative conditions within 2 years of the forest plan revision record of decision (ROD). This assessment should provide for replication in future years to gauge trend. Development of specific vegetative community objectives should focus on achieving healthy ecological conditions and long-term sustainability of native rangeland resources using sound management strategies for both recreational use and livestock grazing.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 20

Component Number: Terrestrial vegetation

Existing Language: General Comment

Recommended Language: If current vegetation community condition data is absent or lacking for the FGNRA, a new revised forest plan objective should be developed. This objective should focus on completing a baseline assessment of vegetative conditions within 2 years of the forest plan revision record of decision (ROD). This assessment should provide for replication in future years to gauge trend.

Explanation: No objective was included in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 31

Component Number: FW-OB-FVA-XX

Existing Language: General Comment

Recommended Language: Add Objective: Increase aspen cover type by at least XX acres (to be determined),



including XX acres (to be determined) accomplished with mechanical treatments.  
Explanation: No objective was included in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 33

Component Number: Narrative

Existing Language: This includes better alignment with the BLM and State Plans to benefit greater sage-grouse conservation on a landscape scale.

Reccomended Language: Development of specific vegetative community objectives should focus on achieving healthy ecological conditions and long-term sustainability of native rangeland resources using sound management strategies for both recreational use and livestock grazing.

Explanation: Recommended language is consistent with existing management and with greater sage-grouse management in Wyoming.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-DC-WL-XX

Existing Language: None

Reccomended Language: Add Desired Condition: The Ashley National Forest contributes to the habitat needs (feeding, breeding, and sheltering) and the long-term persistence of mule deer, pronghorn antelope and Rocky Mountain elk that occur on the Ashley to support continued hunting, trapping, observing, and cultural or tribal uses.

Explanation: Desired condition addresses issues not identified in the draft plan. The draft plan does not adequately address habitat needs for general wildlife.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-DC-WL-XX

Existing Language: None

Reccomended Language: Add Desired Condition: Crucial winter range habitat conditions provide the quantity, quality, and spatial arrangement of forage, cover, and security needed to support WGFD population objectives for mule deer, pronghorn antelope, and Rocky Mountain elk.

Explanation: Desired condition addresses issues not identified in the draft plan. The draft plan does not adequately address crucial winter range and the importance of critical winter range to ensure the viability of big game populations.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-DC-WL-XX

Existing Language: None

Reccomended Language: Add Desired Condition: Manage habitats to support WGFD in the attainment of big game herd unit objectives, fish management objectives, and well distributed, healthy populations of fish and wildlife species consistent with the WGFD's Strategic Habitat Plans, State Wildlife Action Plan, and strategic

population plans.

Explanation: Desired condition addresses issues not in draft plan. Without suitable habitat which is managed by the Forest, the Department would not be able to maintain big game and fish populations.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-DC-WL-XX

Existing Language: None

Reccomended Language: Add Desired Condition: Designated Ungulate Migration Corridors. Bookmark:

Expected WY Executive Order on Ungulate Migration Corridors

Explanation: Desired condition addresses issues not identified in draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-DC-WL-XX

Existing Language: None

Reccomended Language: Add Desired Condition: Hunting, fishing, plantgathering and other species-based recreation and traditional use opportunities exist, but do not compromise species, populations, or habitat.

Explanation: Desired condition addresses issues not identified in draft plan. It's important the draft plan recognize the importance of hunting, fishing, and recreation on the Forest.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-DC-WL-01

Existing Language: The plan area provides habitat that is needed for feeding, breeding, and sheltering by native species, particularly during periods of high energy demands (such as reproductive seasons and winter) for the portion of those species' life cycles that occur on the Ashley National Forest. Also see desired conditions for vegetation.

Reccomended Language: Revise Desired Condition: Habitat is available at the appropriate spatial, temporal, compositional, and structural levels such that it provides adequate opportunity for breeding, feeding, nesting, and carrying out other critical life cycle needs for a variety of vertebrate and invertebrate species.

Explanation: Revised desired condition addresses issues not identified in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-DC-WL-XX

Existing Language: None

Reccomended Language: Add Desired Condition: Habitat loss and fragmentation is reduced and permeability is enhanced by conserving and restoring habitat linkages within and, where possible, between the national forests and other lands.

Explanation: Desired condition addresses issues not identified in draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-DC-WL-XX

Existing Language: None

Reccomended Language: Add Desired Condition: Habitat configuration, connectivity and availability allow wildlife populations to adjust their movements in response to major disturbances (such as effects of changing climate and uncharacteristic fire) and promote genetic flow between wildlife populations. These interconnected habitats allow for seasonal migrations, breeding, dispersal, foraging, and other movement patterns to support life-history characteristics.

Explanation: Desired condition addresses issues not identified in draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-OB-WL-XX

Existing Language: None

Reccomended Language: Add Objective: Annually coordinate with WGFD to discuss if habitat improvements are needed within big game crucial winter range.

Explanation: No objective was included in the draft plan.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-GL-WL-01

Existing Language: Management activities should avoid or mitigate surface disturbance and disruptive activities to native ungulates (animals with hoofs) on winter range during the winter season.

Reccomended Language: Revise Guideline: Prohibit surface-disturbing and disruptive activities within identified big game crucial winter range from November 15 to April 30.

Explanation: Specific dates will assure the Department and public that big game using winter range will be minimally disturbed.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-ST-WL-XX

Existing Language: None

Reccomended Language: Add Standard: No person shall collect shed antlers or horns from big game animals on the Flaming Gorge National Recreation Area from January 1 through April 30 of each calendar year.

Explanation: This standard is to comply with Wyoming Game and Fish Commission, Chapter 61, Collection of Shed Antlers and Horns regulations; Section 3

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-GL-WL-XX

Existing Language: None

Recommened Language: Add Guideline: Remove or modify existing fences to address habitat fragmentation and barriers to migration on a case-by-case basis.

Explanation: Guideline addresses issues not identified in the draft plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-GL-WL-XX

Existing Language: None

Recommened Language: Add Guideline: Modifications, mitigations, or other measures should be incorporated into site-specific project plans to reduce negative impacts to wildlife and to provide for specific habitat needs, consistent with project or activity activities.

Explanation: Guideline addresses issues not identified in the draft plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-GL-WL-XX

Existing Language: None

Recommened Language: Add Guideline: To conserve wildlife habitat connectivity, constructed features (such as exclosures, wildlife drinkers, range improvements, fences, roads, and culverts) should be maintained to support the purpose(s) for which they were built. Constructed features should be removed when no longer needed, to restore natural hydrologic function and maintain habitat connectivity.

Explanation: Guideline addresses issues not identified in the draft plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 34

Component Number: FW-GL-WL-XX

Existing Language: None

Recommened Language: Add Guideline: Work collaboratively with WGFD to plan and implement projects that make progress towards the Ashley's desired conditions and help achieve conservation actions specified in Wyoming State Wildlife Action Plan, Wyoming State Wildlife Action Plan, or other planning/management documents

Explanation: Guideline addresses issues not identified in the draft plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 35

Component Number: FW-GL-WL-09

Existing Language: When domestic sheep or goat grazing permit for an allotment that is in proximity to bighorn sheep is voluntarily waived without preference, the allotment should be analyzed to provide separation of domestic sheep and bighorn sheep by either: 1) potential closure of all or a portion of the allotment to domestic sheep/goats, 2) potential conversion to a cattle allotment, or 3) utilization as a forage reserve.

Recommened Language: REMOVE AND REPLACE WITH: Standard: Manage in accordance with the appropriate Statewide Bighorn/Domestic Sheep Plan.

Explanation: This proposed guideline may violate Wyoming State Statute. The recommended standard is in alignment with state policy.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 35

Component Number: FL-GL-WL-10

Existing Language: New permitted grazing by domestic sheep or goats should not be authorized unless: 1) separation of domestic sheep or goats from bighorn sheep can be demonstrated, or 2) research demonstrates risk of respiratory pathogen transfer from domestic sheep or goats to bighorn sheep can be avoided in another way, or research demonstrates respiratory pathogen transfer from domestics to bighorn sheep is no longer an issue.

Recommended Language: Remove; replaced above for FW-GL-WL-09

Explanation: This proposed guideline may violate Wyoming State Statute. The recommended standard is in alignment with state policy.

Comenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 35

Component Number: Wildlife

Existing Language: None

Recommended Language: N/A

Explanation: BOOKMARK: Goat/pack goat use should be allowed on the ANF. We would like to have further discussion surrounding goat use and the recommendations found in WAFWA's 2012 Domestic Sheep and Goat Management in Wild Sheep Habitat report (Wild Sheep Working Group, 2012)

Commenter: WGFD

Document: Proposed Plan

Chapter: 3

Page Number: 47

Component Number: FW-DC-EM-03

Existing Language: Areas with renewable energy generation (hydropower, solar, and wind energy) potential are available or considered for energy development, where such development is not otherwise precluded and following considerations of other resource values and desired conditions.

Recommended Language: Add appropriate objectives, standards, guidelines, and suitability of lands.

Explanation: Without the appropriate objectives, standards, guidelines, and suitability of lands there is no assurance development may or may not conflict with other resource values. Recommend developing appropriate objectives, standards, guidelines, and suitability of lands.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 48

Component Number: FW-ST-EM

Existing Language: New oil and gas leases shall also include no surface occupancy for inventoried roadless areas and occupied sage-grouse habitat that occurs within priority habitat management areas.

Recommended Language: Revise Standard: New oil and gas leases shall also include no surface occupancy stipulations for inventoried roadless areas and Flaming Gorge National Recreation Area (existing management) and be consistent with the State of Wyoming Executive Order 2019-3, Greater Sage-Grouse Core Area

Protection (WYSGEO) or most current WYSGEO.

Explanation: Recommended language is consistent with existing management and with greater sage-grouse management in Wyoming.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 52

Component Number: FW-GO-IN-XX

Existing Language: None

Recommended Language: Add Goal: Roads and trails not needed for long-term objectives are decommissioned, stabilized, and restored to a more natural state.

Explanation: Goal addresses issues not identified in the draft plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 52

Component Number: FW-GL-IN-XX

Existing Language: None

Recommended Language: Add Guideline: During project planning, design, and implementation, unneeded roads should be decommissioned, restoring the watershed hydrologic functions and all habitats.

Explanation: Guideline addresses issues not identified in the draft plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 55

Component Number: FW-DC-ROS-02

Existing Language: A variety of developed and dispersed recreation opportunities are available for a diverse group of users. Recreation opportunities are commensurate with recreation settings and other resource values.

Recommended Language: Revise Desired Condition: A variety of developed and dispersed recreation and tourism opportunities (for example, camping, picnicking, hiking, mountain biking, hunting, fishing, wildlife viewing, equestrian use, driving for pleasure, and motorized recreation) are available for a diverse group of users. Recreation opportunities are commensurate with recreation settings and other resource values.

Explanation: Revised desired condition addresses an issue not identified in the draft plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 2

Page Number: 57

Component Number: FW-GL-ROS-XX

Existing Language: None

Recommended Language: Add Guideline: Build and maintain relationships with a diversity of local communities, partnerships, volunteers, other government agencies, range permittees, cooperators, recreation users, and permit holders to help co-manage a sustainable recreation program and minimize conflicts among uses, including planning, design, implementation, and operations and maintenance. Recognize partners for their roles in providing recreational opportunities when possible.

Explanation: Guideline addresses issues not identified in the draft plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 3

Page Number: 67

Component Number: Flaming Gorge National Recreation Area

Existing Language: General Comment

Recommened Language: We recommend the following language be added to Flaming Gorge National Recreation Area narrative: Administration of the Flaming Gorge National Recreation Area was established by Public Law 90-540 in 1968. The law specifically directs the Secretary of Agriculture to: "[hellip]administer, protect, and develop the Flaming Gorge National Recreation Area in a manner to best provide for: (1) public outdoor recreation benefits; (2) conservation of scenic, scientific, historic, and other values contributing to public enjoyment; and (3) such management, utilization, and disposal of natural resources as in his judgement will promote or are compatible with, and do not significantly impair the purpose for which the recreation area is established."

Explanation: Adding this language will inform the public the reason that Congress established the Flaming Gorge National Recreation Area and management as outlined in Public Law 90-540.

Commenter: WGFD

Document: Proposed Plan

Chapter: 3

Page Number: 68

Component Number: Flaming Gorge National Recreation Area

Existing Language: General Comment

Recommened Language: N/A

Explanation: On Page 68, 2nd paragraph, the plan identifies that the Ashley National Forest is being impacted by cheatgrass, halogeton and aggressive annuals that displace native plant communities. We recommend that tamarisk and Russian olive be added to this narrative. Both of these species are having a negative impact to the native plant communities especially in the riparian zones along Flaming Gorge Reservoir and Green River. Furthermore, no desired condition/s, objective/s, standards/guidelines, or goal/s have been identified to address how the Forest Service is going minimize and reduce the infestation of these invasive species. We recommend plan components be added to the plan.

Commenter: WGFD

Document: Proposed Plan

Chapter: 3

Page Number: 68

Component Number: Flaming Gorge National Recreation Area

Existing Language: General Comment

Recommened Language: N/A

Explanation: The plan has identified six desired conditions, but no objectives for FGNRA. We strongly recommend that appropriate desired conditions and objectives be developed. In addition to objectives, suitability of lands should be identified.

Commenter: WGFD

Document: Proposed Plan

Chapter: 3

Page Number: 69

Component Number: Flaming Gorge National Recreation Area

Existing Language: General Comment

Recommened Language: N/A

Explanation: The existing plan includes "Appendix A Flaming Gorge National Recreation Area Supplemental Direction." Although some of the management actions contained within Appendix A are outdated, many of the

management actions are still pertinent. We recommend that Ashley National Forest work with Wyoming cooperators to update this Appendix to be included in the Revised Land Management Plan for the Ashley National Forest. We recommend the following Guideline be added: If there are any conflicts in management direction for the Flaming Gorge National Recreation Area, the Supplemental Direction will take precedence. The Supplemental Direction for the Flaming Gorge National Recreation Area is in Appendix (to be determined)

Commenter: WGFD

Document: Proposed Plan

Chapter: 3

Page Number: 69

Component Number: DA-GL-FGNRA-02

Existing Language: Ground-disturbing activities should consider impacts to the midget-faded rattlesnake.

Recommened Language: Revise this guideline to the following: Surfacedisturbing and/or surface disruptive activities should consider impacts to the Midget-Faded Rattlesnake. Before a surface-disturbing and/or disruptive activity occurs within potential Midget-Faded Rattlesnake habitat (i.e rock outcroppings), the Forest Service should consult with WGFD to determine if the surface-disturbing and/or surface disruptive activity occurs within 500m of a known Midget-Faded Rattlesnake den. If the surface-disturbing and/or surface disruptive activity is not within 500m of a known den site and occurs in potential Midget-Faded Rattlesnake habitat (i.e. rock outcroppings), the area will be surveyed for Midget-Faded Rattlesnake den sites using WGFD survey protocol. Known Midget-Faded Rattlesnake den sites should be protected from surface-disturbing and surface disruptive activities.

Explanation: Recommend consideration is given to making this a standard or the Species of Concen list given new information. Midget Faded Rattlesnakes may represent a unique species of the western rattlesnake (Davis et al. 2016; Schuett et al. 2016); however, additional data is needed to inform this taxonomic change. Midget Faded Rattlesnakes in the Flaming Gorge area are at northernmost extent of the (sub)species' range and represent an important genetic stronghold for this species. Additionally, "the Flaming Gorge population is at potential risk. We know from the genetic data that connectivity is limited and so sites can be easily isolated. Even low-use gravel roads were associated with reduced gene flow. Dens tend to have lower population size relative to other communally denning rattlesnakes and any impacts of dens affects every life stage of the snake, but especially gravid females and juveniles that stay around the den year round. Avoiding development around den sites should be a priority", (Dr. StephenSpear, personal communication, October 21, 2019). Surface-Disturbing Activity=Any authorized action that disturbs vegetation and surface soil, increasing erosion potential above normal site conditions. This definition typically applies to mechanized or mechanical disturbance. However, intense or extensive use of hand or motorized hand tools may fall under this definition. Examples of surface disturbing activities are construction of well pads and roads, pits and reservoirs, pipelines and power lines; mining; and vegetation treatments. Surface (human) Disruptive Activity= The physical presence sounds and movements of people and their activities that are likely to cause displacement of or excessive stress to wildlife during critical life stages (breeding, nesting, and birthing) or during periods of severe winter weather conditions. Examples of disruptive activities include noise, traffic, or human presence regardless of the purpose of the activity.

Commenter: WGFD

Document: Proposed Plan

Chapter: 4

Page Number: 85-91

Component Number: Plan Monitoring Program

Existing Language: General Comment

Recommened Language: N/A

Explanation: Without objectives for 38 resources (such as terrestrial vegetation, wildlife, recreation), we find it difficult how the Forest Service will determine if the key monitoring questions that are used to evaluate whether



management is maintaining or moving toward or away from a desired condition are being answered. Recommend objective/s be added to these 38 resources.

Commenter: WGFD

Document: Proposed Plan

Chapter: Appendix B

Page Number: 105-115

Component Number: Management Approaches

Existing Language: General comment

Recommened Language: N/A

Explanation: For resource specific management approaches, we recommend that they appear in either Chapter 2 or 3 under the specific resource. As written, it's very confusing with a majority of the management in Chapter 2 or 3 and having management approaches in an appendix at the back of the document.

Commenter: WGFD

Document: Proposed Plan

Chapter: Appendix B

Page Number: 105-115

Component Number: Management Approaches

Existing Language: General comment

Recommened Language: N/A

Explanation: We believe that some of the management approaches could be objectives or guidelines. We recommend the Forest Service work with cooperators to discuss whether or not these are management approaches, objectives, or guidelines.

Commenter: WDA

Document: Preliminary need for Change

Chapter: N/A

Page Number: 4

Component Number: Managing Trad. Resources

Existing Language: "Grazing plays an important role in the economics and lifestyle of the local communities. Most rangelands on the Ashley National Forest are in good condition, but some areas have been affected by increases in invasive plant species, drought, and conifer encroachment that have contributed to reduced forage production. Management of rangelands have changed since the 1986 forest plan. Desired conditions, goals, objectives, standards, and guidelines for rangeland and grazing management in the Ashley's 1986 plan are vague or not measurable. Previous range inventories emphasized forage value rather than the effects of grazing on ecological integrity and plan communities as whole."

Recommened Language: "Grazing plays an important role in the economics and lifestyle of the local communities. Most rangelands on the Ashley National Forest are in good condition, but some areas have been affected by increases in invasive plant species, drought, and conifer encroachment that have contributed to reduced forage production. Desired conditions, goals, objectives, standards, and guidelines for rangeland and grazing management in the Ashley's 1986 plan are vague or not measurable. Additionally, traditional range inventory and monitoring methods have not always informed management in a meaningful way."

Explanation: The ANF seems to imply all previous livestock grazing was improper and jumps to the conclusion that there are issues with "ecological integrity" and "plant communities as a whole" which is in no way defensible or consistent with statements made elsewhere in the section. Changes in invasive species, weather (e.g., drought), conifer encroachment and reduced forage availability are not impacts from livestock grazing, they are impacts to livestock grazing.

Commenter: WDA

Document: Proposed Plan

Chapter: 1

Page Number: 2

Component Number: Plan Structure

Existing Language: "There is no requirement that every topic have plan components[hellip]"

Recommened Language: N/A

Explanation: WDA believes the USFS should review 36 CFR 219.7(e) and provide additional reference to regulations allowing the flexibility of plan components. Strengthen the document.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 12

Component Number: FW-GL-SO-02

Existing Language: "Effective ground cover for this purpose is any combination of downed wood, slash, litter, surface rock and understory vegetation and is seperate from the direction for the overall forest ecosystem to maintain 85 percent or more of the potential ground cover in terrestrial vegetation management"

Recommened Language: Ground cover is the cover of plants, litter, rocks, and gravel on a site and differs from total cover, foliar cover, basal cover, vegetation cover, and canopy cover. "Cover" can be used in various ways to determine species contribution to vegetative and hydrologic characteristics of a site (NRCS 1999). Additionally, cover associated with forested areas (such as overstory) is different than cover associated with upland areas, such as sagebrush steppe.

Explanation: Where does 85% of the potential ground cover originate from? Existing policy, regulations? See also page 19 for similar comment. We do not believe there is appropriate baseline data to understand what each of the ecological sites capability is. Additionally, "effective ground cover" should be defined clearly in monitoring methods and there are differences between types of cover. See

[https://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENT S/stelprdb1044175.pdf](https://www.nrcs.usda.gov/Internet/FSE_DOCUMENT%20S/stelprdb1044175.pdf)

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 15

Component Number: FW-OB-WA- 0102/General Comment

Existing Language: Obj: "01-Complete at least one project per year with design features to restore habitat or populations of aquatic species. 02-Improve 10 stream miles of aquatic species habitat every 5 years."

Recommened Language: N/A

Explanation: There are considerable differences and variability between the author and written resource sections.

Example: there are 16 Desired Conditions for Watershed and Aquatic Ecosystems, while Livestock Grazing has 2. The more desired conditions, the more specific components for objectives, standards, and guidelines to meet those desired conditions. Objectives on Watershed is VERY specific while others have no objectives at all. The Plan should have more consistency from section to section. WDA supports an equitable approach to plan components with the livestock grazing section. See our comments and additions throughout the table.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 17

Component Number: FW-GL-RMZ-02

Existing Language: "Vegetation management may occur in riparian management zones only as needed to attain or maintain desired conditions for aquatic, terrestrial and riparian resource or to provide for public safety."

Recommened Language: Replace with: Vegetation management occurs in riparian management zones as needed to maintain or move towards desired conditions.

Explanation: This statement is overly restrictive. Vegetation management could range from grazing to prescribed fire, but this Guideline will prohibit most management options. The need to attain or maintain desired conditions for aquatic, terrestrial AND riparian are the drivers to determine IF vegetation management occur. All management options would require NEPA, so this Guideline is predetermining any future treatment options before NEPA occurs.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 18

Component Number: Terrestrial-3rd Paragraph

Existing Language: "Desired conditions, standards, and guidelines for terrestrial vegetation[hellip]" Also "Standards and guidelines are designed to ensure that future project activities are conducted in a manner that move the Ashley National Forest toward desired conditions."

Reccomended Language: N/A

Explanation: COMMENT: There are no standards written for this section on pages 18 or 19. Additionally, "ensure" is not part of standard or guideline definition. It states they are used "to help achieve or maintain a desired condition." Additionally, we are unclear of what the current forest and vegetative conditions are, if they are the desired condition, and if the previous 1986 Plan components were implemented. The revised Plan should take this into consideration of how to address current condition, and not assume we are at desired condition.

REVISE

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 19

Component Number: FW-DC-TV-09

Existing Language: "Within their capability, vegetation communities provide satisfactory foraging habitat for native pollinator species such as bees..."

Reccomended Language: Replace with: Vegetation communities provide foraging habitat for native pollinator species such as bees, butterflies, moths, and hummingbirds. Ecological processes create[hellip]

Explanation: "satisfactory" is not measurable and the USFS does not have enough information to determine "capability" of sites at this time.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 21

Component Number: FW-GL-FVA-02

Existing Language: "To help support sprouting and sprout survival sufficient to perpetuate the long-term viability and resilience of aspen clones, limit livestock utilization of key forage species to no greater than 50% of current year's growth, except where long-term monitoring demonstrates different allowable use level is appropriate."

Reccomended Language: N/A

Explanation: The aspen section should be closely reviewed as it is lacking in multiple ways. Additionally, aspen is not a key forage species and livestock grazing should not be singled out. Overall aspen browse must include consideration of wildlife but WDA does not recommend or condone any standard or guideline that includes restrictive language such as "50% of current year's growth" since this is well beyond the capability of the ANF to manage.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 28

Component Number: FW-DC-NFS-02

Existing Language: "In greater sage-grouse seasonal habitat, 70% or more of sagebrush communities have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy cover."

Recommened Language: "In greater sage-grouse HMA's, habitats are adequately distributed to support greater sage-grouse populations 70% or more of lands capable of producing sagebrush have from 5% to 25% sagebrush canopy cover and less than 4% conifer cover." 2019 FEIS

Explanation: Need to include most recent language from Sagegrouse ROD from Wyoming and Utah.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 29

Component Number: FW-OB-NFV-02

Existing Language: "Within the Anthro Plateau land type association, change no less than 200 acres of mountain big sagebrush every 5 years during the life of the plan from 20 percent or greater canopy, to less than 5 percent canopy to enhance brood rearing and summer habitat for greater sage-grouse."

Recommened Language: Remove

Explanation: Follow the USFS 2019 ROD for sage-grouse. This Objective doesn't exist.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 33

Component Number: Wildlife-Paragraph 1

Existing Language: General Comment

Recommened Language: N/A

Explanation: WDA does not support listing bighorn sheep as a Species of Conservation Concern. Any bighorn sheep on the Wyoming side are not core-native and should not warrant the same level of protection. We reiterate the need to follow Wyoming and Utah Statewide Bighorn/Domestic Sheep working group plans.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 33-35

Component Number: Wildlife

Existing Language: "The Ashley National Forest contains periphery lynx habitat that is identified as unoccupied, and is unlikely to be used by a breeding female lynx. However, this habitat could be occasionally used by lynx during dispersal. Therefore, plan components guide the maintenance of forest structure in this periphery habitat on the Ashley. p. 33." " To provide habitat for Canada lynx that may use or move through periphery habitat on the Ashley, a mosaic of forest structure should be maintained that includes dense early successional...p. 35"

Recommened Language: Remove

Explanation: WDA opposes managing for a single species, which currently does not exist, and at best, may perhaps disperse through. We instead recommend managing the forest for a mosaic of native plant species to benefit a suite of wildlife species.

Commenter: WDA

Document: Plan

Chapter: 2

Page Number: 35

Component Number: FW-GL-WL-09

Existing Language: "When a domestic sheep or goat grazing permit for an allotment that is in proximity to bighorn sheep is voluntarily waived without preference, the allotment should be analyzed to provide separation of domestic sheep and bighorn sheep by either: 1) potential closure of all or a portion of the allotment to domestic sheep/goats, 2) potential conversion to a cattle allotment, or 3) utilization as a forage reserve."

Recommended Language: REMOVE AND REPLACE WITH: Standard: Manage in accordance with the appropriate Statewide Bighorn/Domestic Sheep Plan.

Explanation: We not support any form of involuntary exclusion of domestic sheep. Bighorn and domestic sheep must coexist. We recommend the ANF review the Wyoming and Utah Bighorn Sheep Statewide Management Plans in depth. The original intent of bighorn sheep translocations in the mid 1980's was not to remove domestic sheep from grazing allotments on the Ashley National Forest

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 35

Component Number: FW-GL-WL-10

Existing Language: "New permitted grazing by domestic sheep or goats should not be authorized unless separation of domestic sheep/goats from bighorn sheep can be demonstrated, or research demonstrates risk of respiratory pathogen transfer from domestic sheep/goats to bighorn sheep can be avoided in another way, or research demonstrates respiratory pathogen transfer from domestics to bighorn sheep is no longer an issue."

Recommended Language: Remove, see comments on Guideline 09 above.

Explanation: There's no reasonable expectation the future Responsible Official will decide in favor of existing levels of domestic sheep grazing on the Ashley. The language written as a "Guideline" is well outside of a "constraint" as defined. The bighorn sheep on the Ashley National Forest are translocated herds, well outside of their originally intended location, and should not dictate the future of domestic sheep and goat grazing across the entire forest or prohibit future domestic sheep producers from grazing on the Ashley.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: Livestock Grazing

Existing Language: General Comment

Recommended Language: N/A

Explanation: Livestock Grazing theme is under written and lacks any emphasis of the value to the ecological benefits. Including, but not limited to: soil aeration, seed to soil contact through hoof action, invasive plant control, fine fuels reduction, maintenance of open space across the landscape, increased water developments and access to wildlife, as well as a source of food and fiber for beneficiaries well outside the plan area. Additionally, need to include congressional mandate language allowing grazing on suitable lands through the Multiple Use and Sustained Yield Act of 1960, Forest and Rangeland Renewable Resource Planning Act of 1974, Federal Land Policy and Management Act of 1976, and National Forest Management Act of 1976. We would request the identification of the number of active permits, vacant allotments, forage reserves, closed allotments, and the number of permitted AUMs.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-DC-LGR-01

Existing Language: "Sustainable rangelands provide forage for livestock grazing opportunities that contribute to agricultural economy, local employment, and support traditional lifestyles and generational ties to the land."

Recommended Language: REPLACE DC-01 with New DC-01: "Maintain a viable livestock grazing program by providing the maximum amount of sustainable forage, while contributing to the long-term socioeconomic diversity and stability of local communities while preserving open space, cultural values, and traditional lifestyles."

Explanation: Recommended language better aligns with the definition of a Desired Condition.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-DC-LGR-XX

Existing Language: None

Recommended Language: Add Desired Condition: Maintain and improve rangeland infrastructure to improve grazing sustainability and achieve desired conditions.

Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-DC-LGR-XX

Existing Language: None

Recommended Language: ADD DC-05: " In areas where forage availability has been impacted by invasive species, conifer encroachment, or other changes, utilize vegetation treatments and/or range developments to increase suitability for livestock grazing.

Explanation: See page 4, paragraph 1, in the Need for Change. The Need for Change states there are rangelands affected...

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: Livestock Grazing Goal -02

Existing Language: "Collaborate with livestock grazing permittees and local and State governments to develop monitoring methods and strategies, and provide grazing management resources to permittees."

Recommended Language: Replace with: "Develop a cooperative monitoring agreement/MOU between the Forest Service, the relevant state agencies, and grazing permittees to increase involvement on Forest Service monitoring methods and standards. "

Explanation: Monitoring methods are already developed. Cooperative Monitoring Agreements and/or MOU's are necessary to ensure the USFS can utilize data collected by permittees, contractors, etc.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: Livestock Grazing

Existing Language: None

Recommended Language: ADD Goal: Work closely with local, state, and federal partners to develop Ecological Site Descriptions across the forest.

Explanation: ESD's are one of the best tools available to identify site capability and a clearer path to ensure Desired Conditions are realistic.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: Livestock Grazing

Existing Language: None

Recommened Language: Add Goal: Provide livestock grazing permittees flexibility in rangeland management (i.e. stocking rates, season of use, on and off dates, utilization, etc. to maintain or move rangelands towards desired conditions.

Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-GL-LGR-01

Existing Language: Guideline - 01 "Utilization of key forage species should be no greater than 50 percent of current year's growth, except where long-term monitoring demonstrates a different allowable use level that will meet desired conditions."

Recommened Language: REPLACE with new Guideline: Determine forage use by domestic livestock using a combination of monitoring data, current conditions, and existing grazing management on the allotment as determined during planning cycles (such as annual operating instructions and permit renewal) to sustain livestock grazing and maintain ecological function and process.

Explanation: This is specific requirement is unnecessary for a land use plan and previous experience in fact shows this is not in the best interest of future decisions, given changes in science and application. While written as a Guideline, this will undoubtedly get inserted as a Standard under Terms and Conditions of the grazing permittees.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-DC-LGR-02

Existing Language: Guideline - 02 "Leave a four-inch or greater stubble height of herbaceous species at the end of the grazing season between greenline and bank full of stream systems, except where long-term monitoring demonstrates a different stubble height that will meet desired conditions."

Recommened Language: Replace with new Guideline: Livestock grazing within riparian management zones should be managed to sustain proper stream channel morphology, floodplain function, and riparian vegetation desired conditions.

Explanation: Remove this guideline as written. This is overly prescriptive and no other resource or use is written with these specifics. No other forest that has undergone or is in the process of a forest plan revision under the 2012 Planning Rule has proposed utilization standards or stubble height at a forest plan level.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-GL-LGR-XX

Existing Language: None

Recommened Language: ADD Guideline: The Forest Service will utilize adaptive management at the permit level to achieve or make progress to meeting desired conditions.

Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-GL-LGR-XX

Existing Language: None

Recommened Language: ADD Guideline: Following large disturbances (fire, flood, etc.), that substantially reduce available forage for livestock, work closely with permittees when restocking to meet or make progress towards desired conditions.

Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-OB-LGR-XX

Existing Language: None

Recommened Language: ADD Objective: During the life of the plan identify allotments where grazing distribution and carrying capacity could be improved through new infrastructure, infrastructure modifications or vegetation treatments.

Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-OB-LGR-XX

Existing Language: None

Recommened Language: Add Objective: During the life of the plan, provide an annual inventory of all closed and vacant allotments and assess the vegetative health and ability to permit these allotments for active domestic livestock grazing use.

Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 45

Component Number: FW-ST-LGR-XX

Existing Language: None

Recommened Language: ADD Standard: Maintain existing stock driveways. Work closely with grazing permittees who trail and may need to deviate from these existing stock driveways.

Explanation: addresses issue not contemplated by proposed plan



Commenter: WDA  
Document: Proposed Plan  
Chapter: 2  
Page Number: 45  
Component Number: FW-ST-LGR-XX  
Existing Language: None  
Reccomended Language: ADD Standard: Maintain or increase current level of permitted AUMs to work towards or meet desired conditions over the life of the plan.  
Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA  
Document: Proposed Plan  
Chapter: 2  
Page Number: 45  
Component Number: FW-ST-LGR-XX  
Existing Language: None  
Reccomended Language: ADD Standard: Collect and maintain adequate data as well as maintain rangeland infrastructure (fences, stock tanks, etc.) on non-active allotments to ensure reissuance of permits occurs in a timely manner.  
Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA  
Document: Proposed Plan  
Chapter: 2  
Page Number: 45  
Component Number: FW-ST-LGR-XX  
Existing Language: None  
Reccomended Language: Add Standard: Develop a project level MOU between local, state, and federal agencies and grazing permittees prior to augmentations or introductions of bighorn sheep.  
Explanation: addresses issue not contemplated by proposed plan

Commenter: WDA  
Document: Proposed Plan  
Chapter: 2  
Page Number: 45  
Component Number: FW-ST-LGR-XX  
Existing Language: None  
Reccomended Language: ADD Standard: Avoid closures and vacant allotments of domestic sheep for the benefit of bighorn sheep. Implement voluntary best management practices to mitigate risk of disease transmission between domestic and bighorn sheep."  
Explanation: This is the only mechanism for the domestic sheep producers to maintain existing grazing allotments. WDA does not support reducing grazing over the life of the plan with the intent of increasing bighorn habitat. Follow the original intent of the bighorn translocations found in the UT Bighorn Sheep Statewide Management Plan.

Commenter: WDA  
Document: Proposed Plan  
Chapter: 2  
Page Number: 48

Component Number: Energy and Minerals FW-GO-EM-02

Existing Language: "New oil and gas leases shall also included no surface occupancy stipulations for inventoried roadless areas and occupied sage-grouse habitat that occurs within priority habitat management areas."

Reccomended Language: N/A

Explanation: Follow the USFS 2019 ROD and WY EO for sagegrouse.

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 62

Component Number: Recreation

Existing Language: None

Reccomended Language: ADD GOAL - "The Ashley National Forest seeks to reduce conflicts between multiple-use through educational resources."

Explanation: addresses issue not raised by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 62

Component Number: Recreation

Existing Language: None

Reccomended Language: ADD Objective - "Identify areas where recreational uses such as motorized vehicles, non-motorized, livestock grazing overlap, or other uses overlap. Develop and construct at least one educational kiosk at designated trailheads to provide information of the multi-use mission of the Ashley National Forest."

Explanation: addresses issue not raised by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 2

Page Number: 70

Component Number: Recreation

Existing Language: None

Reccomended Language: ADD Standard - "Authorize motorized access only for the maintenance of existing range improvement projects."

Explanation: addresses issue not raised by proposed plan

Commenter: WDA

Document: Proposed Plan

Chapter: 3

Page Number: 71

Component Number: High Uintas Wilderness

Existing Language: None

Reccomended Language: Add Standard -06 "Authorize new range improvements associated with existing livestock grazing allotments for resource protection."

Explanation: addresses issue not raised by proposed plan

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: National Forest Management Act regulations [36 CFR 219.10(b)(ii)] state the plan must include plan components, including standards or guidelines, to provide for the protection of cultural and historic resources. The Ashley National Forest plan currently only provides two objectives for the management of cultural resources and does not address standards, guidelines, and goals for cultural resources. We are concerned by the lack of vision for management of this resource into the future.

Explanation: The plan now has 1 goal, 4 objectives, 1 standard, and 1 guideline for Cultural Resources. It still lacks a clearly stated vision for the management of this resource. Appendix B - Proposed and Possible Management Actions does address a number of our comments below but we are wondering if "proposed and possible management actions" is a commitment to actually carry out these action items.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: To provide more proactive management of cultural resources we recommend including the following objective: Avoid, minimize, or mitigate negative effects from natural or human-caused impacts to at least one heritage asset annually.

Explanation: Include language as an Objective. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: To provide more proactive management of cultural resources we recommend including the following objective: At least 200 acres will be inventoried annually under Section 110 of the National Historic Preservation Act.

Explanation: Under objective 01 pg 39, they intend to complete cultural surveys to find and document five cultural resource sites each year for the life of the plan. No commitment to the amount of acres surveyed.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: To provide more proactive management of cultural resources we recommend including the following objective: At least 5 percent of land burned by wildfires greater than 50 acres will be inventoried within one year of being burned.

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest? Recommend making this an Objective.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: To provide more proactive management of cultural resources we recommend including the following objective: Conduct condition assessments on priority heritage resources on a 5-year cycle.

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest? Recommend making this an Objective.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: To provide more proactive management of cultural resources we recommend including the following objective: Assess 20 percent of priority heritage assets annually until all priority assets have condition assessments on file dated no greater than five years in age.

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest? Recommend making this an Objective.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: No Standards were included in the Ashley Land Management Plan for cultural resources. We recommend including this Cultural Resource Standard: Report to law enforcement officers and investigate all Archaeological Resources Protection Act violations.

Explanation: not specifically addressed. in Appendix B pg 111 they will inform permit holders about ARPA

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: We recommend including this Cultural Resource Standard: Outfitter and guide camp assigned sites shall not be authorized within the boundaries of National Register of Historic Places eligible or listed historic properties.

Explanation: Include language as a Standard. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: We recommend including this Cultural Resource Standard for Special Uses:

Modifications to historic structures authorized under special use authorizations do not result in adverse effects to historic properties.

Explanation: Include language as a Standard. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommened Language: We recommend including this Cultural Resource Standard: Historic characteristics are retained when structures eligible for or listed in the National Register of Historic Places are converted for adaptive reuse.

Explanation: Include language as a Standard. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommened Language: We recommend including this Cultural Resource Standard : Visual impacts to historic properties are avoided or mitigated. This is consistent with requirements under the National Historic Preservation Act implementing regulations and serves as an important reminder to consider these types of potential effects to historic properties .

Explanation: Include language as a Standard. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommened Language: We recommend including this Cultural Resource Standard: Adverse effects to historic properties from trail or road maintenance or construction are avoided or mitigated.

Explanation: Include language as a Standard. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommened Language: We recommend including this Cultural Resource Standard: Manage insects and diseases outbreaks around eligible heritage resources in danger of destruction of falling trees (i.e., sheeptraps, wickiups, pole lodges, historic cabins, etc.).

Explanation: Include language as a Standard. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: We recommend including this Cultural Resource Standard: Surface development for oil and gas activity should not occur within 0.25 mile of heritage resources eligible for or listed in the National Register of Historic Places.

Explanation: Include language as a Standard. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: We recommend including this Cultural Resource Standard: Oil and gas development within the viewshed of a significant historic property will be evaluated and mitigated.

Explanation: Include language as a Standard. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: No Guidelines were included in the Ashley Land Management Plan for cultural resources. We recommend including this Guideline for Management of Cultural Resources: When appropriate, heritage plan components or protocols should be incorporated into the Programmatic Agreement among the USDA Forest Service, Wyoming Forests, Wyoming State Historic Preservation Officer, and Advisory Council on Historic Preservation, Regarding Compliance with the National Historic Preservation Act on the National Forests and Grasslands of Wyoming (Region 2 Agreement #09-MU-11020000-03) (USDA Forest Service et al. 2008) or into a memorandum of understanding.

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest? Recommend making this a Guideline.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: We recommend including this Guideline for Management of Cultural Resources:

Heritage resource protection signs should be posted at developed recreation locations, e.g., trailheads and other areas, to deter Archaeological Resources Protection Act violations.

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest? Recommend making this a Guideline.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: We recommend including this Guideline for Management of Cultural Resources:

Visual, auditory, and atmospheric effects to National Register eligible heritage resources should be evaluated during project development.

Explanation: Include language as a Guideline. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: No Goals were included in the Ashley Land Management Plan for cultural resources. We recommend including this Goal for Management of Cultural Resources: Opportunities for education, research, traditional use, and stewardship are provided

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest? Recommend making this a Guideline.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: No Goals were included in the Ashley Land Management Plan for cultural resources. We recommend including this Goal for Management of Cultural Resources: Heritage resources are identified, evaluated for the National Register of Historic Places, and managed for appropriate use.

Explanation: Designated as a Desired condition pg 39, but recommend replacing as a Goal.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: No Goals were included in the Ashley Land Management Plan for cultural resources. We recommend including this Goal for Management of Cultural Resources: Identify and protect heritage resources susceptible to post-fire effects, including vandalism, by surveying areas of high archaeological potential burned by wildland fire.

Explanation: Include language as a Goal. This addresses issue not identified in the draft plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommended Language: No Goals were included in the Ashley Land Management Plan for cultural resources. We recommend including this Goal for Management of Cultural Resources: Artifacts removed from National Forest System lands will be curated at professional facilities with official curation agreements in place.

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest? Recommend making this a Goal.

Commenter: SHPO

Document: Appendix B

Chapter: N/A

Page Number: General

Component Number: General

Existing Language: General Comment

Reccomended Language: N/A

Explanation: Proposed Management Approaches are interchangeable with Standards, Guidelines, or Objectives. Ashley should review with Cooperators to review all Management Approaches and place them in the Plan.

Commenter: SHPO

Document: Proposed Plan

Chapter: Appendix B

Page Number: 110

Component Number: Cultural Resources

Existing Language: None

Reccomended Language: This proposed management action lacks specificity. We suggest incorporating the following language in the Land Management Plan: The Ashley National Forest is obligated by the National Historic Preservation Act to consider effects on historic properties from agency undertakings and to establish a preservation program. A proactive program of heritage resource management, consistent with Federal guidelines for the specific implementation of the National Historic Preservation Act, the Archaeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act, is achieved in part by creating a heritage program plan. The Ashley, through direction from FSM 2360 Heritage Program Management, will develop a heritage program plan. Close coordination with Tribal Historic Preservation Offices, the Wyoming and Utah State Historic Preservation Offices, and other interested parties during the development of the heritage program plan results in a plan that guides the protection and enhancement of heritage resources on the Ashley. The heritage program plan will be updated as necessary.

Explanation: This is a proposed and possible management action on pg 110. We would like a see a time frame and commitment to develop and implement a heritage program plan by the forest.

Commenter: SHPO

Document: Proposed Plan

Chapter: Appendix B

Page Number: 111

Component Number: Cultural Resources

Existing Language: None

Reccomended Language: The heritage program plan should provide Ashleyspecific protocols for including, but not limited to: Inadvertent discovery of heritage resources, including human remains and associated objects.Prevention of, and response to, Archaeological Resources Protection Act violations.Prevention of the effects from wildland fire and postfire looting.Identification of areas of high, moderate, and low probability for the presence of heritage resources. Monitoring to assess site conditions and measure the success of mitigation measures.Reviewing categorically excluded National Environmental Policy Act projects to determine if National Historic Preservation Act review is required.

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest?

Commenter: SHPO\*\*\*\*

Document: Proposed Plan

Chapter: Appendix B

Page Number: 111

Component Number: Cultural Resources



Existing Language: None

Recommened Language: We recommend the heritage program plan specify the following: Partnerships with those interested in the Ashley's heritage resources are an integral part of the program. Memoranda of understanding and programmatic agreements are used to streamline consultation and improve the management of heritage resources. Archaeological Resources Protection Act permits will be issued to facilitate research opportunities by qualified individuals associated with reputable institutions. Cooperative agreements are developed with other Federal agencies, the States of Wyoming and Utah, universities, and local communities to promote and protect the Ashley's heritage resources. Forest Service collections are curated at professional facilities where official loan and/or curation agreements are in place, and these facilities will make them available to qualified researchers. Heritage information is maintained, improved, and shared with appropriate cooperators while following confidentiality regulations. Heritage resource location models are created for specific projects, geographic areas, and/or resource types. Heritage site location and condition data are maintained in the agency's corporate database and in a spatial database with restricted access. As part of the heritage program, heritage data is entered, tracked, and maintained in the Forest Service infra database. Results of field inventories will

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest?

Commenter: SHPO

Document: Proposed Plan

Chapter: Appendix B

Page Number: 111

Component Number: Cultural Resources

Existing Language: None

Recommened Language: We recommend Management Approaches for Cultural Resources state that public awareness, involvement, and appreciation of heritage resources will be increased over time using tools such as site stewardship and the "Windows on the Past" program. Ashley personnel will continue to work with permit holders to inform and educate them on Archaeological Resources Protection Act regulations and violation repercussions and incorporate Archaeological Resources Protection Act language into authorizations and/or annual operating instructions. The heritage specialist will be involved from the beginning in special use authorizations that involve interpreting or visiting cultural resource sites.

Explanation: This is a proposed and possible management action on pg 111 but is there actually a commitment to do this by the forest?

Commenter: SHPO

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommened Language: We recommend Management Approaches for Cultural Resources state that standard inventory strategies are used to identify high potential locations for historic properties in association with specific projects, geographic areas, and/or resource types.

Explanation: Addresses issue not identified in the draft plan.

Commenter: SHPO\*\*\*

Document: Proposed Plan

Chapter: 2

Page Number: 37-38

Component Number: Cultural Resources

Existing Language: None

Recommened Language: The 2015 Land Management Plan developed by the Shoshone National Forest

included a management strategy for developing a list of priority heritage assets that they intend to update annually. We recommend the Ashley develop a similar list and include this language in the Management Actions section: Priority heritage assets are inventoried and deferred maintenance condition surveys are completed at least every 5 years. Priority heritage assets are heritage assets of distinct public value that are, or should be, actively maintained and meet one or more of the following criteria: The significance and management priority of the property is recognized through an official designation, for example, listing in the National Register of Historic Places, State Register, etc. The significance and management priority of the property is recognized through prior investment in preservation, interpretation, and use. The significance and management priority of the property is recognized in an agency approved management plan. The designation of a priority heritage asset is a local management decision; the list of priority heritage assets on any given unit is dynamic. A list of priority heritage assets will be kept and updated annually. Priority heritage assets include some areas with significant heritage value, but are either small or do

Explanation: Addresses issue not identified in the draft plan.

Commenter: DEQ

Document: Proposed Plan

Chapter: 1

Page Number: 14

Component Number: 3

Existing Language: None

Reccomended Language: The WQD requests the addition of a new Desired Condition for Watershed and Aquatic Ecosystems: "Surface waters in Wyoming are in compliance with Wyoming State Water Quality Standards and are fully supporting their designated uses"

Explanation: Addresses issue not identified in the draft plan.

Commenter: DEQ

Document: Proposed Plan

Chapter: 1

Page Number: 15

Component Number: FW-WL-WA-01

Existing Language: N/A

Reccomended Language: Guideline FW-GL-WA-01 should also require culverts, bridges, and other stream crossings to be constructed wide enough to pass the bankfull width unimpeded to protect stability and function of streams.

Explanation: Addresses issue not identified in the draft plan.

Commenter: DEQ

Document: Proposed Plan

Chapter: 1

Page Number: 16

Component Number: 23-29

Existing Language: None

Reccomended Language: The WQD appreciates that the Forest Service intends to include State nonpoint best management practice guidelines for site-specific management activities. BMPs found in the Wyoming DEQ's Silviculture Best Management Practices manual would be most relevant to the Forest

Plan:[http://deq.wyoming.gov/media/attachments/Water%20Quality/Nonpoint%20Source/Best%20Management%20Practices/2004\\_wqd-wpp-Nonpoint-Source\\_Silviculture-Best-Management-Practices.pdf](http://deq.wyoming.gov/media/attachments/Water%20Quality/Nonpoint%20Source/Best%20Management%20Practices/2004_wqd-wpp-Nonpoint-Source_Silviculture-Best-Management-Practices.pdf)

Explanation: Addresses issue not identified in the draft plan.

Commenter: DEQ

Document: Proposed Plan

Chapter: 2

Page Number: 78

Component Number: Second Row

Existing Language: None

Recommened Language: The document indicates that the monitoring guide that will be part of the final draft of the Forest Plan will act as a roadmap for routine and project-specific monitoring. The WQD recommends that the Forest Plan define specific watershed health metrics that will be applied consistently to all routine and projectspecific monitoring and evaluation efforts, rather than using different metrics for each evaluation. This will allow the Forest Service to use routine monitoring data to establish baseline conditions that can be used to evaluate future projects.

Explanation: Addresses issue not identified in the draft plan.

Commenter: State Parks

Document: Proposed Plan

Chapter: 1

Page Number: 7

Component Number: Distinctive Roles

Existing Language: The recreational....greatest assets

Recommened Language: There should be additional information about use and numbers of people moving to and using the area. The Flaming Gorge is a National Recreation Area, however, the FS doesn't seem to market this along the I-80 corridor. The document states that most visitors come from N. Utah and southern Wyoming. SPCR is just completing a visitor survey for all of our parks and historic sites. Bear River State Park shows a diversity of visitation from other states looking for areas to hike, bike and camp. Much of their information drawing them into the park comes from highway signs. Perhaps there should be an effort to coordinate with partners to encourage first time visitors to explore this area. There is interest in exploring this area of Wyoming, however, wayfinding to and within the FGNRA is not very robust to encourage new visitors. Perhaps a coordinated visitor center with other federal/state/local entities would be an important consideration to create visitors to stay additional nights in the area.

Explanation: It is important for the reader to know what the increase in visitation is and how recreation use has changed. The USFS should also provide the change in socio-economic value to the surrounding community. This will be helpful in judging the direction the forest needs to go with its planning goals, conditions and objectives

Commenter: State Parks

Document: Proposed Plan

Chapter: 2

Page Number: 36

Component Number: FW-DC-SE

Existing Language: The flow of these goods....Ashley NF communities

Recommened Language: The flow of these goods and services are responsive to local, state or county plans and contribute to existing and emerging industries and overall economic conditions of Ashley National Forest communities.

Explanation: With the new FS shared stewardship, coordination is more than just responsivity. It means joint planning and implementation. There should be the intent on the part of the FS to coordinate future recreation planning with their partners. Both the state and county have outdoor recreation plans - to which the FS needs to coordinate with.

Commenter: State Parks

Document: Proposed Plan

Chapter: 2

Page Number: 52

Component Number: FW-DC-IN # 9 & 10

Existing Language: Year-round nonmotorized experiences....and hiking.

Recommened Language: Non-motorized single-track trails are developed to create a destination opportunity for mountain biking, horseback riding, and hiking creating a socioeconomic benefit for residents and visitors alike.

Explanation: Just building trails will not always draw new or returning visitors. There needs to be a plan and a commitment to develop the trail system to draw people to it. Coordination with the county/city and state are very important in how this is created and developed as well as marketed.

Commenter: State Parks

Document: Proposed Plan

Chapter: 2

Page Number: 54

Component Number: FW-DC-ROS

Existing Language: Need to make this a goal or objective within the plan

Recommened Language: The FS should consider finding a physical location within Green River that can serve as a point of information and direction for visitors to explore the FGNRA. There should be an advocate or liaison to help with advocating, educating and sharing recreation opportunities on the Ashley NF that is active in the surrounding Wyoming Communities. The USFS also needs to increase the outreach to attract visitors as they travel along I-80.

Explanation: In order to fully support the outdoor recreation industry and its growth there needs to be a contact/advocate for Ashley NF recreation opportunities. This should include a visitor center or other mechanism where by visitors travelling to SW Wyoming can learn more about recreation opportunities. The FS should maintain their commitment to create a recreation plan for the FGNRA.

Commenter: State Parks

Document: Proposed Plan

Chapter: 2

Page Number: 55

Component Number: FW-DC-ROS

Existing Language: Desired Conditions in its entirety. Specifically Condition 03: Recreation opportunities enhance the economic, cultural, and social vitality and wellbeing of surrounding communities. Local communities are involved in partnerships and long-term relationships with stakeholders and are fostered to facilitate and participate in sustainable recreation on the Ashley National Forest.

Recommened Language: Each of the conditions should have specific type of goal for each use. And it would be good to determine the region or area the FS wants to draw from - SW WY and NE UT or larger areas. How recreation opportunities are developed will influence where people come from. Opportunities could be just backyard opportunities for local folks, or they could be a regional or state draw by creating longer more diverse trails. Curt Gowdy trails provide a multi-state draw throughout the non-winter season which has supported the local and regional outdoor recreation mt biking community. Specifically Condition 03 should be written to help the state and local governments meet their economic diversity goals in relationship to developing the outdoor recreation industry.

Explanation: Setting a goal in the plan is important. The current language is vague and just about anything could meet this goal.

Commenter: State Parks

Document: Proposed Plan

Chapter: 2

Page Number: 57

Component Number: FW-DC-RECDEV #01

Existing Language: Quality, well-maintained recreation facilities at key locations, accommodate use, enhance the visitor's experience, and protect the natural resources of the area.

Recommened Language: Quality, well-maintained recreation facilities at key locations, accommodate use,

enhance the visitor's experience, supports the states and counties outdoor recreation plan, and protect the natural resources of the area.

Explanation: This has been mentioned before, but the current draft plan language is very vague. The State's Outdoor Recreation Industry needs more product to draw and keep people in Wyoming. The FS can and should create part of the recreational opportunity product to support the outdoor recreation industry.

Commenter: State Parks

Document: Proposed Plan

Chapter: 2

Page Number: 61

Component Number: FW-DC-VEI

Existing Language: Condition 01 Interpretation and education programs help enhance visitors' understanding and appreciation for the rich natural and cultural resources of the Ashley National Forest, and build support for public lands.

Reccomended Language: Condition 01 Interpretation and education programs help enhance visitors' understanding and appreciation for the rich natural and cultural resources of the Ashley National Forest and the surrounding area, and build support for public lands.

Explanation: See Above.

Commenter: State Parks

Document: Proposed Plan

Chapter: Appendix B

Page Number: 113

Component Number: Entire Section

Existing Language: N/A

Reccomended Language: There needs to be more specific direction on how the FGNRA will be managed to maintain recreation opportunities and become a destination recreation area.

Explanation: This plan should be coordinated with the WY Outdoor Recreation Office as well as SW county planning.

WY\_ANF\_Table\_FINAL.pdf ALL INFORMATION AND TEXT FROM THE ATTACHED TABLE.

WY\_ANF\_Table\_FINAL.pdf ALL INFORMATION AND TEXT FROM THE ATTACHED TABLE.