

Data Submitted (UTC 11): 2/16/2022 7:00:00 AM

First name: Kate

Last name: Barlow

Organization: State of Wyoming, Office of Governor Gordon

Title: Policy Advisor

Comments: Please find enclosed a letter from Governor Mark Gordon as well as a table of comments which are incorporated by reference in the letter. Please let us know if you have any questions. -Kate Barlow

February 15, 2022 Sue Eickhoff Forest Supervisor Ashley National Forest 355 North Vernal Ave. Vernal, Utah 84078  
Supervisor Eickhoff: Thank you for the opportunity for the State of Wyoming to comment on the Draft Environmental Impact Statement (DEIS) for the Ashley National Forest Plan Revision. National Forests, including the Ashley National Forest (ANF), are essential to our economy, citizens, and visitors. The forest plan revision process is key to the management of national forests and integral to the future of states and forest adjacent communities since the Plan Revision will guide management decisions on the forest for the next 15 to 20 years. The ANF Plan Revision process has been ongoing for over five years. The State of Wyoming has participated diligently in the process as a cooperating agency, submitting hundreds of comments and attending many meetings. At times, we have been frustrated by a lack of responsiveness from the ANF to our comments and concerns. Still, we appreciate the renewed effort to engage cooperators, fully understand our issues, and provide more than dismissive justifications for our concerns. Attached you will find comments from the State of Wyoming. In an effort to be as helpful and clear as possible, many comments include suggested language changes. There are also a number of general comments that apply to either an entire resource section of the DEIS or the DEIS as a whole. The ANF is encouraged to review the comments provided by Wyoming state agencies closely, and please contact us if you have any questions or need further clarification. On behalf of our state cooperating agencies, we request the ANF provide us the opportunity to discuss the potential agency preferred alternative. Sincerely, Mark Gordon Governor  
Attachment Below Governor's Office Comments  
The comments from the Governor's Office are intended to highlight some of the largest perceived issues with the DEIS and are not all inclusive. Some of Wyoming's comments are broad and only involve a certain example, but should be reviewed against the entirety of the document. The Ashley NF is encouraged to closely review the comments provided by Wyoming state agencies for further detail on specific topic areas. The DEIS is clunky and often confusing. In many instances the chains of logic are incomplete, phrases are interchanged, or analyses are simply divergent. State agencies have identified many of these areas but all share concerns surrounding the validity of the analysis across the DEIS. In some instances, the FS is dangerously close to appearing pre-decisional on a preferred alternative. This is a result of analysis that guides the reader to the superiority of alternative B over the other alternatives, rather than providing analysis against an unbiased baseline for each resource area in each alternative. The DEIS lacks clarity on how the Flaming Gorge National Recreation Area planning process will be influenced by the Ashley Forest Plan Revision and how that process will proceed. Ch. 3, Page 323  
The DEIS only lays out the legal requirement for the FS to perform a consistency review between the alternatives and state/county land use plans and policies. It does not provide an analysis of the consistency between the alternatives and the relevant plans and policies. The stakeholders and public should be made aware of any analysis completed and analysis completed in the past should be reviewed in light of any changes that may have occurred or conditions that may have changed. The State of Wyoming is supportive of maintaining multiple use on FS land, which is inhibited by additional designations of wilderness areas and other restricted areas, such as backcountry recreation areas. The State of Wyoming is concerned about the use of natural ignitions as a management practice to meet objectives. WDA Comments Ch. 2, Page 23 Annual Vegetation

Treatment: Alternative C "No comparable plan components.hould read "Same as Alternative A"Ch. 2, Page 24Example: Alternative A: Ch. 2: "Utilization and stubble height based on land health standards." Alternative B: Ch. 2: "50% utilization and 4 inch stubble height guidelines with exceptions where different height will meet desired conditions VERSUS Alternative A: Appendix B: "Limit forage utilization by livestock of key browse species on big game winter range to 20 percent." or Alternative B: Appendix B: "To ensure sustainable and resiliency of forage resources, limit utilization of key forage species to no greater than 50 percent of current year's growth, unless long-term monitoring demonstrates a different allowable use level is appropriate."Appendix B Language Comparison of Action Alternative Plan Components differs greatly from Ch. 2 Comparisons Table. Concern of what language will go into FEIS and Preferred Alternative. WDA does not support a site specific utilization level or stubble height in the Land Use Plan. As stated in previous comments, we believe this is a project level decision. Each allotment has different ecological sites, including different soils, vegetation, and precipitation. Therefore, utilization levels should be determined individually under project level NEPA.Ch. 2, Page 25, Table 2-2Example: Alternative A: Ch 2: "Sheep Allotments remain unutilized for a period of 5 years may be considered for conversion to another class of livestock or closed" VERSUS Appendix B: No comparable guidelines under Alternative A." Alternative B:Ch 2: "New domestic sheep or goat allotments would not be authorized unless separation... VERSUS Appendix B: Alternative B: "New permitted domestic sheep or goat allotments should not be authorized..."Appendix B Language Comparison of Action Alternative Plan Components differs greatly from Ch. 2 Comparisons Table. Concern of what language will go into FEIS and Preferred Alternative. WDA does not support the range of alternatives related to domestic sheep and bighorn sheep.Ch. 2, Page 26, Table 2-2Destination Recreation Areas for Grazing compare permitted acres.Table should compare the number of HMs/AUMs permitted in DRAs including the number reduced under Alternative C.Ch. 3, Page 49"Over the life of the plan, livestock grazing management that results in improvements to land health conditions would maintain the soil condition:"Suggested change: "Over the life of the plan, livestock grazing management that results in improvements to meeting desired conditions..."Plan language needs to have consistency throughout to tie back to guidelines and determine if desired results are met.Ch. 3, Page 50"This desired condition is being met in rangeland areas, except where soil conditions are deteriorating."There isn't a direct correlation with existing livestock grazing management, utilization levels, stubble heights, and deteriorating soils. However, this section of the analysis assumes livestock grazing may be the causal factor for deteriorating soils. Shallow soils, wind swept ridges, headcuts, recreation, etc. are all other ecological factors to consider for deteriorating soils. The analysis must consistently analyze the resources and causal factors equitably with use of monitoring data.Ch. 3, Page 52"Alternative B would provide specific utilization and stubble height guidelines that could be increased or decreased depending on the soil conditions..."The Plan lacks clear parameters for what desired conditions are and how to achieve them. As stated in the soils section, soils are one of the resource determinants if deviations from 50% utilization may occur. Given the lack of clarity for soils desired conditions, no deviations from 50% utilization will occur. WDA cannot support this language as proposed.Ch. 3, Page 53"This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height exceeds 4 inches."Suggested change: "This would implement a 40 percent utilization level and 4 inch stubble height level."While WDA does not support the alternative, the language in the plan is inconsistent and inadequately analyzes the actual impacts between the alternatives.Ch. 3, Page 54, Effects from Grazing"Similar to alternative A, alternative D would not include specific utilization or stubble height guidelines. Impacts on soils under alternative D would be the same as those described under alternative A."Suggested change: "If desired conditions are not met under alternative D, then site specific adjustments will be made accordingly."Desired conditions need clear definitions and parameters for meeting. Alternative D would not be the same, because if desired conditions were not met under D, then the allotments would require adjustments accordingly.Ch. 3, Page 65, Table 3-8Total Average Size (Acres)The math doesn't average when totalled and divided. Need to redo the math and provide an explanation how average acres are determined.Ch. 3, Page 73, Effects from Livestock Grazing"Approximately 1,000,700 acres of active allotments.."Alternative C, page 24 states 919,700. Ensure acreages are accurate under each alternative and analyzed consistently throughout the Plan. See also page 248.Ch. 3, Page 79, Effects from Livestock Grazing"Livestock grazing would be restricted in destination recreation areas under alternative C. This would removes 13,000 acres from grazing and would eliminate potential impacts on water quality for streams..."Are all DRAs in or near streams? This section is out of place. No other alternative compares the

environmental impact by livestock grazing.Ch. 3, Page 80, Effects from Livestock Grazing"Alternative C would reduce acres available for active grazing allotments by 130 acres..."Suggested change: "Alternative C would reduce acres available for active grazing allotments by 13,000 acres."Ch. 3, Page 81, Effects from Livestock Grazing"This would remove 2,100 acres of riparian vegetation and 600 acres of wetlands..."This is the first time a breakdown of the type of acres in the DRAs. The analysis is incomplete by only analyzing the impacts from grazing and lacks the increased impacts from trampling by increased recreation use. Examples will include trampling of vegetation, eroding of streambanks, creation of trails, by humans and vehicles. WDA urges the Plan to acknowledge and analyze the impacts to DRAs by other uses.Ch. 3, Page 108, Effects from Veg"Under alternatives B, C, and D, vegetation treatments would occur over every decade following plan implementation..."The total for mechanical timber oriented treatments is approximately (rounded to the nearest 100 acres) 1,500 acres for the first decade and 1,200 acres for the second decade."Page 24 states vegetation treatments will occur on an annual basis, not decade. We recommend reviewing the Plan in its entirety to ensure an analysis consistency.Ch. 3, Page 118, Effects from Veg"Alternative C aims to treat 1,000 acres in the first decade and 800 acres in the second decade."Page 24 states vegetation treatments will occur on an annual basis, not decade. We recommend reviewing the Plan in its entirety to ensure an analysis consistency.Ch. 3, Page 118-119, Effects from Rec"Livestock grazing would be excluded from destination recreation areas (23,000 acres). However only 13,000 acres currently have active grazing, therefore reduction of potential effects to terrestrial vegetation would be limited to this area."The analysis misleads the reader to believe the reduction of livestock grazing from 13,000 acres is actually a benefit. However, it could potentially be a negative, with increased fine fuels for wildfire, shifting plant communities to a monoculture, as well as neglecting to include the increased trampling from recreation users, such as tents, fisherman walking the stream banks, loss of vegetation for increased facilities, etc.Ch. 3, Page 119, Effects from Grazing"Alternative C would have reduced acres (13,400 acres closed) available for active grazing allotments and fewer HMs, compared with Alternative A."The Plan inconsistently describes how it will implement DRAs and remove livestock grazing from these areas. Some resource section analysis states "exclude" while this section states "closed." We do not support "closure" of allotments, as these areas were already adjudicated and delineated for grazing livestock. USFS Handbook 2209.13 Chapter 10, 16.6 states "Grazing permits may be canceled in whole or in part where a decision has been made to devote certain National Forest System lands to another public purpose that precludes grazing by permitted livestock. Except in an emergency, do not cancel a permit without a two-year notification (36 CFR 222.4(a)(1))." WDA is concerned the permittees with grazing allotments in the DRAs have no idea their permits may be canceled. Additionally, the DRAs were estimating excluding livestock from 13,000 acres, not 13,400 acres as stated.The analysis lacks any indication of impacts or benefits to livestock grazing permits from vegetation treatments and the differences between the sizes of treatments across the range of alternatives.Ch. 3, Page 120, Effects from Grazing"This provides flexibility for grazing management and may result in utilization levels higher or lower than 50 percent and reduced or increased stubble heights ..." "Without a defined stubble height guideline for key forage species, grazing below 4-inch stubble height may prevent key forage species from reestablishing..."Given this analysis is comparing Alternative D to A, and Alternative A does not have 50 percent utilization or 4-inch stubble height limits, this analysis is flawed. Additionally, the analysis is biased. The Plan neglects to accurately convey how each permit and allotment has annual monitoring, Allotment Management Plans, Annual Operating Instruction meetings and plans; all of which guide livestock grazing to meet desired conditions.Finally, this section neglects to include any impacts or benefits to livestock grazing related to the annual vegetation treatments. WDA recommends the Plan include these treatments in the analysis across all resources under the Terrestrial Vegetation section.Ch. 3, Page 146, Big GameThe big game section completely excludesnon-native mountain goats. This is imperative to divulge, not only the population of mountain goats, but also their geographic location and distribution. The geographic overlap with bighorn sheep is a major concern given the likely pathogen transmission between the two species.Ch. 3, General CommentWDA urges the USFS to include language regarding the Statewide MOU for management of bighorn sheep. This document was signed by the USFS and includes direction in which the agencies should work to manage the species, while not at the expense of removing domestic sheep from public lands.Ch. 3, Page 147, Bighorn Sheep"Bighorn Sheep were reintroduced on the Ashley National Forest in 1983."WDA understands the first reintroduction was in 1989 not 1983, and all bighorn sheep on the Ashley are a result of translocation. We are greatly concerned this section inadequately

provides the history of the original translocation sites, acknowledging the translocation occurred with active domestic sheep grazing, distances of original translocations of bighorns from existing and active domestic sheep allotments, distance bighorns have dispersed from the original translocation sites, UDWR's original intent and level of risk for translocation, etc. The Plan must also tie back to a viability/persistence analysis, followed by how the range of alternatives addresses viability of bighorn sheep. Ch. 3, Page 161, Effects from Grazing "Deer may avoid sites with high cattle utilization (Collins and Urness 1983), and reproductive success may be lower in areas with high cattle stocking rates (Smith 1984). In addition to habitat alterations, domestic livestock grazing can have adverse effects on bighorn sheep populations by increasing competition for space and forage." Suggested change: Remove statement The Plan's analysis lacks the UDWR's population objectives for big game species. Statements such as those provided are conveying domestic livestock as a causal factor for reducing reproductive rates due to excessive stocking rates. The Plan also lacks the information to determine if bighorn sheep on the Ashley actually overlap with active domestic livestock grazing allotments. More specifically, there should be no overlap with domestic sheep and there is little to no high elevation cattle grazing where bighorn sheep are found. If there are closed allotments this also needs included. We believe this is imperative to divulge in the Plan and analyze accordingly. Finally, these studies are old and unlikely an actual issue. WDA recommends removing this statement. Ch. 3, Page 162, Effects from Grazing "The absence of forest-wide forage utilization guidelines could result in relatively higher levels of impacts (for example, from reduced vegetation cover)..." The analysis is biased and ignores the fact that each permit has individual NEPA to analyze impacts. Additionally, each permit is accompanied by an AMP, annual monitoring data, with the ability to make grazing management changes prior to the turnout of livestock the following grazing season. WDA is concerned how the analysis leads the reader to believe the Plan is the only regulatory mechanism to guide grazing, and ignores the benefits of well managed livestock grazing to actually improve wildlife habitat. WDA recommends reviewing the Plan for these biased statements and revising accordingly. Again, we oppose a forest wide utilization guideline. "Lower stubble height and higher forage utilization would cause plant communities to shift toward non-palatable or grazing-tolerant species which would reduce forage for native ungulates such as bighorn sheep." A suitability analysis would identify where cattle grazing is acceptable and where these allotments, if at all, overlap with bighorn sheep. Domestic sheep are managed to keep separate from bighorn sheep, therefore they can not contribute to reducing forage for bighorn sheep. The plan fails to include monitoring data related to habitat and forage as it relates to wildlife. More specifically, bighorns on the Ashley are translocated and should not be considered "core native." Ch. 3, Page 162 Effects from Des. Areas "Under Alternative A, existing designated areas would remain, but not new management..." The Plan must identify the number of acres remaining under Alternative A. Ch. 3, Pages 167-168, Effects from Rec and Table 3-40 "Specifically, destination recreation MAs, which emphasize developed recreation experiences in high-use areas with motorized access and support facilities, would have the greatest level of impacts on wildlife and at-risk species." Destination Recreation Areas overlapping Rocky Mountain Bighorn Sheep CHHR The Table states under each alternative how much overlap with DRAs across bighorn sheep CHHR acres. This should cause great concern given the Plan must reduce impact to ensure persistence of bighorn sheep. WDA insists the Ashley identify and analyze the negative impacts due to stress for bighorn sheep from recreation. Ch. 3, Page 172, Effects from Grazing "Compared with Alternative A, this would improve habitat conditions for wildlife and at-risk species within active allotments." If each allotment has an AMP with benchmark indicators, as stated on page 162, then the statement comparing Alternative B to A is flawed. The Plan has to transparently identify where and why the benchmark indicators at the project/permit level have not worked or provided the appropriate habitat for wildlife. The Plan neglects to include any specific information where wildlife habitat needs improved or how livestock grazing under Alternative A has caused reduced populations, reproduction, or displacement. "Forest plan components would help to address the threat of pathogen transfer from domestic sheep to bighorn sheep by providing separation when a permit is waived without preference. Where bighorn sheep cannot come in contact with domestic sheep, disease transmission is significantly reduced or eliminated." The Plan's analysis related to domestic sheep and bighorn sheep is flawed. The analysis does not provide information related to how bighorn sheep left their original translocation site and are now directly adjacent to active domestic sheep allotments. Under Alternatives B, C, and D, they all rely on current permittees waiving without preference. The encouragement of permittees to waive without preference only comes when buyouts by conservation organizations are offered to permittees and often exceed the actual

value of the permit. WDA does not support the range of alternatives as proposed and does not support the analysis. The analysis simply restates the guidelines from Chapter 2, but completely neglects to tie how the guideline addresses the persistence of bighorn sheep. The Plan lacks how much actual separation is needed between domestics and bighorns. This amount of separation will likely decimate the domestic sheep grazing industry on the Ashley. Finally, the Ashley must divulge the reality that bighorns in the project area already carry diseases and acknowledge how additional stressors such as winter snow conditions, recreation, and others can negatively impact bighorns and cause die offs. "...provide separation of domestic and bighorn sheep when a permit is waived without preference by 1) providing separation that would mitigate the threat of pathogen transfer from domestic sheep and goats to bighorn sheep, consistent with the most current state big horn sheep management plans; 2) adjusting the time or dates, or both, when domestic sheep are on the allotment; 3) potentially converting the allotment to a cattle and horse allotment; 4) using the allotment as a cattle and horse forage reserve; 5) potentially closing all or a portion of the allotment to domestic sheep and goats." Alternative B is not a reasonable alternative for the following reasons: 1) the amount of separation needed to address foraging rams would essentially remove all domestic sheep from the Ashley. 2) high elevation grazing already is limited with late snow run off and greenup of forage, shifting the dates earlier or later is unreasonable. 3) the potential of a conversion is not only unlikely, but the reality of cattle actually grazing at the high elevation makes this unreasonable, 4) you have to convert to cattle first under 3, then only get limited use under a forage reserve. 5) potentially closing the allotment is not acceptable. The allotments are already adjudicated and delineated for grazing. Closing the allotments takes this off the books, eliminating grazing in perpetuity, regardless of potential vaccines, etc. We are very concerned the Ashley has not addressed our previous concerns regarding the Proposed Action and Range of Alternatives. We insist on a complete revision of the alternatives related to domestic sheep and bighorn sheep.

**General Comment regarding allotment closures** As a conservation organization or agency by intent, nature, and statute, the Ashley NF EIS is not meeting or implementing these principals. Closure of allotments is discouraged by FS Manuals, yet the Ashley is knowingly and willingly proposing closures throughout the DEIS when the allotments are already deemed suitable and capable. By closing any allotments, the Ashley removes the allotments from future use given changes in livestock management, scientific changes, or other actions. The Forest Plan is narrowly analyzing and making decisions based on current conditions, with no room for management decisions to address the likely changing conditions throughout the life of the Plan. Ch. 3, Page 174, Effects from Grazing

**Alternative C** would have fewer acres with active grazing (13,400 acres closed) and fewer head months (HMs) available relative to all other alternatives. Compared with alternative A, this would reduce the extent of impacts on wildlife and at-risk species from livestock grazing. "The acreage for DRAs is inaccurate. The analysis neglects to compare the difference in impacts to wildlife in the DRAs comparing livestock impacts and increased motorized vehicles and recreation. Closure of the DRAs from grazing is unacceptable. This would modify and require additional project level NEPA to delineate new allotment boundaries and by USFS regulations require existing permittees two years notification." Relative to the other action alternatives, this alternative would include additional and more stringent plan direction for separation... Components would include a guideline that would close allotments where permits are voluntarily waived without preference if the allotment does not provide separation between domestic sheep and goats... Additionally, new domestic sheep or goat allotments would not be permitted unless separation from wild bighorn sheep is demonstrated ((FW-GL-WL-10) and domestic sheep and goat allotments that overlap bighorn sheep core herd home range would be closed when opportunities arise (FW-GL-WL 11). "Alternative C is not a reasonable alternative for the analysis. Closure is not equitable to or synonymous with separation. Closure of these allotments will remove all domestic sheep from the Ashley due to bighorn sheep, which is a violation of the Statewide Bighorn Sheep Management Plan, and does not meet the original intent by UDWR when bighorns were translocated in 1989. Currently bighorn sheep have full access to inhabit anywhere on the forest, thereby creating and expanding core herd home range. The delineation of core herd home ranges with unmanaged bighorn populations to close domestic sheep allotments when opportunities arise causes us great concern. It is not the Ashley's responsibility to expand bighorn sheep across the forest, rather to ensure persistence when possible. The range of alternatives is inadequate and does not provide any certainty or assurance for the domestic sheep permittees to successfully graze in the future. Additionally, there are no management actions, guidelines, or standards to address foraging rams, which are more of a significant risk to existing bighorn herds.

WDA encourages the Ashley to identify plan components to address foraging bighorn sheep and include this as part of the persistence analysis. General comment, Bighorn Sheep The range of alternatives for bighorn sheep near domestic sheep is grossly inadequate. While waiving without preference may be conveyed as voluntary, one permittee's decision to waive without preference should not determine the fate of the domestic sheep industry as a whole. The range of alternatives should include one or more alternatives in favor of domestic sheep maintaining existing permits without additional pressures of bighorn sheep. The boundaries of domestic sheep allotments have not changed since the original translocation, but the permittees are required to manage their animals to ensure separation of bighorn sheep. Additionally, the analysis in Chapter 3 does not actually analyze the guidelines under each Alternative. Rather, they simply repeat the verbiage from the alternatives. The analysis should actually be tied back to the persistence analysis. There's no width to the proposed analysis and all are contingent on existing permittees waiving without preference. The alternatives should assume permittees are going to graze in perpetuity and incorporate voluntary best management practices where appropriate. Appendix B Table B-2 includes Guidelines related to new permitted sheep and goat allotments, as well as exclusion of pack goats. While WDA supports the use of pack goats for those who choose to use them and believe you can adequately manage pack goats, the analysis lacks any information if there are pack goat permits currently issued, how many, and if they are currently permitted in bighorn sheep CHHR. We also believe the Plan should analyze the permitting of pack goats equitably with domestic sheep. As proposed, we believe this is inconsistent with the Plan analysis. Ch. 3, Page 176, Effects from Rec" Compared with alternative B, impacts on wildlife and at-risk species due to recreation would increase. At risk species that are sensitive to disturbance, such as fringed myotis, may experience increased disturbance... However, plan components to reduce disturbance to caves would reduce the threat of disturbance... "While the Plan may include a plan component to reduce humans from entering caves, it's unclear if there are caves impacted in the DRAs. Additionally, the analysis lacks how other at risk species are impacted by DRAs or other management areas. There are no equitable plan components for addressing human disturbances, i.e. sage-grouse, bighorn sheep, etc. As proposed, the analysis simply compares acres designated or not. This isn't an actual impact analysis, which we believe must be addressed. "Unlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduced habitat features such as forage and cover. "Alternative D on B-11 states "Utilization of key forage species meets desired conditions for soils and terrestrial vegetation," not "land health standards. " "Desired conditions for terrestrial vegetation under Alternative D takes into consideration of wildlife habitat forage and cover. Annual changes would be made during the development of the AOI prior to turnout of livestock to ensure desired conditions are met. The analysis is biased and misleads the reader to believe only Alternatives B or C are acceptable. "Relative to the other action alternatives, this alternative would include less stringent plan direction for separation of bighorn sheep from domestic sheep... but it does not specify how it is to be done. This leaves the option open on how to achieve separation or mitigation. "Alternative B does not provide the specifics as stated. The Plan simply states it will provide separation. Alternative C closes the allotments, which is not separation. It's simply an elimination of domestic sheep grazing from the Ashley. Additionally, D-9 states transmission of respiratory pathogens occur between individual bighorns, yet the Plan neglects to include any plan components to address this ongoing issue or inclusion of species overlap with mountain goats and likely reason(s) for not meeting persistence. Ch. 3, Page 196, Livestock Grazing "For changes under alternative C due to exclusion of livestock from destination recreation areas, the Forest Service used a GIS analysis to locate pastures... "This section is an economic impacts analysis. However, there is no economic tie to the reduction in HMs due to DRAs. Ch. 3, Page 210, Env. Consequences "Whether the entire pastures would be closed would depend on whether the management areas could be managed to restrict cattle (for example, with fencing, natural barriers, or herding). The statement is genuinely concerning. The Plan is excluding/closing the DRAs by 13,000 acres under Alternative C. However, this now states it could be more, but it's to be determined. This is completely excluded from the range of alternatives Chapter 2 and drastically changes the analysis in both livestock grazing and recreation sections. Ch. 3, Page 248, Analysis Area "919,700"1,000,700 found on page 73. Ch. 3, Page 249, Table 3-70, General Comment The Table includes allotments in the Flaming Gorge. Is the Ashley Plan Revision including the allotments and acres in the Flaming Gorge Plan? WDA urges the clarity of this. Ch. 3, Page 249,

Description"Market demand for livestock products in the U.S. is expected to slowly decline over the coming decades..."This alludes to people no longer eating meat, yet as the population increases, demand for beef and lamb is likely to increase. Remove this statement.Ch. 3, Page 250, Indicators"Total acres open and closed to grazing"The Ashley Plan neglects to identify the number of allotments closed. We are aware of allotments closed from domestic sheep grazing in proximity to bighorn sheep herds. WDA believes this should be included in the Plan by developing a range of alternatives to review the closed allotments and consider reopening them to active grazing where appropriate. Closing an allotment based on an individual permittee's decision, as is the case with waiving without preference and taking a buyout is not representative of the industry's current need for grazing allotments.Ch. 3, Page 252, Effects from Veg"For example, expansion of bighorn populations could result in the need to modify management of domestic sheep allotments to minimize contact between these populations."The Ashley Plan should not allow expansion of bighorn sheep populations when it negatively impacts domestic sheep allotments. As previously stated, it is not the Ashley's responsibility to expand bighorn sheep populations, rather to identify plan components to ensure persistence if possible. This is in direct violation of the intent behind the translocations as well as the Statewide Bighorn Sheep Management Plan. Remove this language.This only further indicates the intent to permanently remove domestic sheep grazing from the Ashley.Ch. 3, Page 253, Effects from Grazing"Without Forest-wide guidelines, different forage use direction could be proposed. This could lead to inconsistent and subjective grazing management across the Ashley National Forest, potentially reducing plant resiliency and forage production."This is a false and misleading statement. Under Alternative A, only one out of 123 watersheds are not meeting desired conditions. This indicates current grazing management using site specific forage utilization and stubble heights at the allotment level can work. It is inappropriate to misapply and misanalyze the Plan's authority, when there are existing regulations for grazing, including project level NEPA, AMPs, and AOIs."Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches..."Again, the wording in the Plan is inconsistent throughout and needs consistency. Alternative B is limited to 50 percent utilization of key forage species.General CommentThe Ashley DEIS is narrowly written with alternatives such as limiting use to 50% of key forage species and 4 inch stubble height. The DEIS should provide a much broader allowance of vegetative use to include exceptions on a site-specific basis by encouraging experimentation or innovation. Given the Plan must address climate change, the range alternatives completely prohibits using targeted grazing to address changing conditions, invasive species, or address changes in plant communities.Ch. 3, Page 255, Effects from Sus. Rec"These [sic] is a small potential [sic] for the need for closures of additional acres in pastures where cattle could not be effectively restricted, resulting in additional loss of HMs. These impacts would be determined at the site-specific level during implementation. Specific operators may be impacted under this alternative, though those impacts are likely to be minimal."This is unacceptably open ended. The Plan analysis limits excluding livestock from DRAs at 13,000 acres. As proposed, it's imperative for permittees potentially impacted to have full transparency of the impacts to their allotments and operations. The Plan neglects to include the economic impacts from the closure of allotments already, let alone the additional loss of acres and HMs as indicated.Ch. 3, Page 256, Effects from Veg"Alternative D would not have management direction to close or convert any existing sheep or goat allotments. Allotments that would be considered for conversion or closure under Alternative A would not be affected under alternative D."B-12 states Alternative A is "No comparable guidelines under Alternative A." Alternative D states: "When a domestic sheep or goat grazing permit for an allotment is voluntarily waived without preference, and if the allotment does not provide separation from bighorn sheep, then authorized use of the allotment should either provide separation of domestic sheep/goats from bighorn sheep or mitigate the threat of pathogen transfer from domestic sheep/goats to bighorn sheep or mitigate the threat of pathogen transfer from domestic sheep/goat to bighorn sheep [sic]." The comparison of the Alternatives is not only inaccurate, but not an actual analysis to determine how Alternative D is better than alternative A when working towards meeting persistence.Appendix D, Pages D-23 and D-25 and Appendix E, Page E-28, Greater Sage-grouse"Also included is a component specific to greater sage-grouse that would stipulate 70 percent or more sagebrush communities have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy in greater sage-grouse seasonal habitat."The Ashley Plan must follow the 2015 Sage-grouse Plan for both Utah and Wyoming, by incorporating the existing plan components into the DEIS. The Ashley Plan language is not consistent with the following language from 2015 UT Sage-grouse Plan: "PHMA[mdash]Maintain all lands ecologically capable of

producing sagebrush (but no less than 70 percent) with a minimum of 15 percent sagebrush cover, or as consistent with specific ecological site conditions."App. E, General CommentThere is a stark difference in authorship in Chapter 2 Development of Desired Conditions, Objectives, Guidelines, and Goals. Some resources are well written with specific components such as Fisheries/Aquatics. For example: Objective (FW-OB-FIS-01) "Complete at least one project per year with design features to restore habitat or populations of aquatic species." This Objective directs the Ashley to implement projects to benefit the resource. The Guidelines are written broadly at the Forestwide Level. However, other resources such as Livestock Grazing are completely void of any project development, assurances to maintain allotments or AUMs, etc. The Guidelines are written at the project level and are regulatory in nature. WDA believes the Plan should revise the Draft to more uniformly develop plan components.App. E, Page E-21, Aspen"To help support sprouting and sprout survival sufficient to perpetuate the long-term viability and resilience of aspen clones, livestock utilization of key forage species should be limited to no greater than 50 percent of current year's growth, except where long-term monitoring and research demonstrates that a different allowable use level is appropriate."Suggested change: removeThis guideline is too prescriptive and should not apply across the forest. Rather allow project level NEPA to determine the appropriate vegetation objectives and management practices to achieve those objectives. Additionally, the exception only can occur with long-term monitoring AND research. The likelihood of implementing long-term monitoring specific to the different utilization levels for each project is unlikely.App. E, Page E-81, Destination Rec Areas, General CommentWDA is very concerned with the Ashley Plan regarding additional designations for recreation, including: Destination Recreation Areas, General Recreation Area, and Backcountry Recreation Areas, of which is 1,103,200 acres proposed under Alternative B. The 1986 Ashley Plan does not include these designations, which is found in Alternative A. The Plan neglects to include why these designations are needed, what regulations guide the designations, how Backcountry Recreation Areas differ from Wilderness, etc. It's even more concerning when these designations are actually reducing livestock grazing. Unlike the Wilderness Act, which retained livestock grazing as it predated the Wilderness Designation, the Ashley is now utilizing new designations with less authority, but without the same respect and retention for existing livestock grazing allotments and permits. Finally, we believe the range of alternatives and respective analysis lacks the width to show impacts from zero areas designated to the full width with the highest designation levels.App. E, Page E-93, MonitoringLivestock Grazing Monitoring Plan: "Are allotments meeting forest plan and allotment management plan utilization guidelines?"Suggested change: Add: How many Head Months actively grazed on an annual basis? Add: How many acres were actively grazed on an annual basis? Add: How many allotments were vacated, closed, or placed in forage reserves?The Plan completely revolves around 50 percent utilization and 4 inch stubble height for livestock grazing. The Plan needs to include the listed Monitoring Questions for livestock grazing to identify how much grazing is changing over the years. This is important as it relates to future Plan Amendments, project level decisions, and the socio economic sections of those NEPA analysis.App. G, Pages 155-158, WildernessAlternative B: "The 10,335 acres were selected ... " Alternative C: "The 50,157 acres of recommended wilderness in Alternative C..."Table 2-3, Chapter 2 of the Plan had the following wilderness numbers, which do not match the Appendix G: Alternative B: 10,300 and Alternative C: 50,200.SEO CommentsCh. 3, Page 63, Water Rights"This objective includes securing water rights for waters not reserved, in accordance with state laws, for water needed on acquired lands and securing rights on reserved lands, if the reservation doctrine or other Federal law does not apply to the uses involved (Forest Service Manual 2451.22)"Suggested change: "This objective includes securing water rights for waters not reserved, in accordance with state law and interstate Compact constraints, for water needed on acquired lands and securing rights on reserved lands, if the reservation doctrine or other Federal law does not apply to the uses involved (Forest Service Manual 2451.22)"Any impoundment or diversion of waters of the State will require proper permitting. The proponent is advised to contact the SEO with specific plans for alterations or diversions to or from any stream channel in the State of Wyoming prior to commencing work.WGFD CommentsCh. 1, General CommentLanguage should be included in the introduction identifying that the Sage-grouse 2015 Amendment is being developed separately from the Ashley National Forest Revised Forest Plan and that once the plan is finalized, it will be included in the Ashley Plan.Ch. 3, General CommentWe recommend the Midget Faded Rattlesnake be added as a species conservation concern. The population on the FGNRA is distinct and experiences restricted gene flow from the rest of the range. However, the restricted gene flow has allowed the subpopulation to maintain genetic purity,



unlike other subpopulations that have hybridized with Prairie Rattlesnake. Genetic purity enhances the importance of maintaining the subspecies on the FGNRA. In addition, documented den densities for Midget Faded Rattlesnakes on the FGNRA are among the highest recorded. As such, we recommend the Ashley National Forest formally acknowledge the importance of protecting this segment of the population.

Ch. 3, Page 146, Big Game"Elk numbers have increased significantly over the last 30 years. An upward trend in the elk population is predicted for the next plan period (Forest Service 2017a), but ultimately trends for all big game species will depend on big game management by the Utah Division of Wildlife Resources (UDWR)."Suggested change: "Elk numbers have increased significantly over the last 30 years. An upward trend in the elk population is predicted for the next plan period (Forest Service 2017a), but ultimately trends for all big game species will depend on big game management by the Utah Division of Wildlife Resources (UDWR) and the Wyoming Game and Fish Department (WGFD)."WGFD manages elk in the portion of the Ashley NF that extends into Wyoming.

Ch. 3, Pages 147-148, Greater sage-grouse"Although there are many locations of greater sage-grouse on the Ashley National Forest, greater sage-grouse occurs at relatively low numbers on the Ashley National Forest when compared with other areas of its range (Forest Service 2017a). Sage-grouse habitat on the Ashley National Forest only support about 10 percent of the sage-grouse population in the Uinta Basin."Suggested change: "Sage-grouse habitat on the Ashley National Forest support approximately 10 percent of the sage-grouse population in the Uinta Basin in Utah. Approximately 13% (184,400 acres) of the Ashley National Forest is designated as either priority or general Greater sage-grouse habitat (Table 3-33)."This section misrepresents the contribution of the Ashley NF and FGNRA specifically to regional sage-grouse habitat. The entire FGNRA is either sage-grouse core area (PHMA) or GHMA, which should not be downplayed.

Ch. 3, Page 148, Greater sage-grouse"Sage-grouse management areas represent the highest-priority areas for sage-grouse conservation in Utah and Wyoming (State of Utah 2019)."Suggested change: "Sage-grouse management areas represent the highest-priority areas for sage-grouse conservation in Utah (State of Utah 2019). Greater sage-grouse Core Population Areas are the highest-priority areas in Wyoming (Executive Order No. 2019-3, 2019)."Wyoming uses sage-grouse Core Population Areas and should not be included in the State of Utah citation.

Ch. 3, Page 150, Amphibians and Reptiles"The western chorus frog (*Pseudacris triseriata*) is a small frog commonly found throughout much of central and northeastern Utah. It can be found in a variety of habitats, including marshes, grasslands, agricultural lands, and forests, provided that water can be found nearby (UDWR 2020e). The northern leopard frog (*Rana pipiens*) is fairly common in Utah, but some reports indicate that its numbers may be declining. This frog occurs in a variety of aquatic habitats, particularly near cattails and other aquatic vegetation; however, it may be found foraging relatively far from water. During cold winter months, it is inactive, and it takes cover underwater or in damp burrows (UDWR 2020f)."Suggested change: "The boreal chorus frog (*Pseudacris maculata*) is a small frog commonly found throughout much of central and northeastern Utah. It can be found in a variety of habitats, including marshes, grasslands, agricultural lands, and forests, provided that water can be found nearby (UDWR 2020e). The northern leopard frog (*Lithobates pipiens*) is fairly common in Utah, but some reports indicate that its numbers may be declining. This frog occurs in a variety of aquatic habitats, particularly near cattails and other aquatic vegetation; however, it may be found foraging relatively far from water. During cold winter months, it is inactive, and it takes cover underwater or in damp burrows (UDWR 2020f)."Corrected portions of common and scientific names.

"The Great Basin spadefoot (*Spea intermontana*) is a small toad found throughout the Great Basin, in a variety of habitats, ranging from dry sagebrush areas to spruce-fir forests. Predicted habitat occurs throughout much of Utah and much of the plan area (UDWR 2020h)."Are there any Western (Boreal) Toads in the Ashley National Forest? WGFD has records near USFS lands on the northern edge of the Uinta Mountains. We recommend updating to reflect, if appropriate."

Reptile species native to the planning unit include the midget faded rattlesnake (*Crotalus oreganus concolor*), terrestrial garter snake (*Thamnophis elegans*), smooth green snake (*Opheodrys vernalis*), and rubber boa (*Charina bottae*). The terrestrial garter snake, smooth green snake, and rubber boa may be found in or near aquatic areas, such as moist meadows and along streams (UDWR 2020i, 2020j, 2020k)."Suggested change: "Snake species native to the planning unit include the midget faded rattlesnake (*Crotalus oreganus concolor*), terrestrial garter snake (*Thamnophis elegans*), smooth green snake (*Opheodrys vernalis*), rubber boa (*Charina bottae*), and Great Basin Gophersnake (*Pituophis catenifer deserticola*). The terrestrial garter snake, smooth green snake, and rubber boa may be found in or near aquatic areas, such as moist meadows and along streams (UDWR 2020i, 2020j, 2020k).

Midget Faded Rattlesnakes and Great Basin Gophersnakes are associated with rock outcrops and the sagebrush community surrounding the Flaming Gorge National Recreation Area. Lizard species native to the Ashley National Forest include the Greater Short-horned Lizard (*Phrynosoma hernandesi*), Northern Tree Lizard (*Urosaurus ornatus wrighti*), Plateau Fence Lizard (*Sceloporus tristichus*), and Northern Sagebrush Lizard (*Sceloporus graciosus*). Plateau Fence Lizards and Northern Tree Lizards are strongly associated with rock outcrops in the sagebrush and shrubland communities in the region. "We recommend splitting the reptile paragraph into snakes and lizards. Based on observations in our database, we recommend confirming whether Desert Striped Whipsnakes occur on the Ashley and updating the snake paragraph if appropriate. We also recommend confirming whether additional lizard species occur on the Utah portion of the Ashley National Forest.

Ch. 3, Page 159, Effects from Designated Areas"Under all alternatives, the existing designated areas described in chapter 2 would remain. These include the Sheep Creek Canyon Geologic Area; the Ashley Gorge, Gates of Birch Creek, Lance Canyon, Pollen Lake, Sims Peak Potholes, Timber-Cow Ridge, and Uinta Shale Creek RNAs; the designated High Uintas Wilderness Area (276,175 acres); IRAs (637,700 acres); and two suitable wild and scenic river segments."Why is the FGNRA not included as a designated area when it is defined as a designated area in Chapter 2 and the regulatory framework establishing the FGNRA is outlined later in Chapter 3? This should be better explained and/or the FGNRA should be included here as a defined designated area. If FGNRA is added, Tables 3-36 through 3-38 should be updated appropriately as should the text."At-risk species associated with shrubland habitat, such as the pygmy rabbit and greater sage-grouse, would be impacted to a lesser extent from management for designated areas; this is because fewer acres of shrubland would be classified as a designated area (see table 3-35), and no greater sage-grouse or pygmy rabbit habitat would be classified as a designated area (table 3-37). However, ecosystem resilience may decline in designated areas over time due to the lack of habitat restoration and enhancement management (for example, a lack of mechanical vegetation management to minimize the possibility of beetle epidemics and large-scale, uncharacteristic fire). Shrubbyland habitat would also experience this impact to a lesser extent."Suggested change: "Only 500 acres of shrubbyland is included in the proposed designated areas (table 3-36), none of which are habitat for sage-grouse or pygmy rabbits (table 3-38). As such, at-risk species associated with shrubbyland habitat would not realize the same benefits as other species from management for designated areas."Assuming FGNRA is not added as a designated area, there is no reason to discuss hypothetical limitations of designated areas when no habitat exists for either at-risk species identified.

Ch. 3, Page 259, Renewable Energy"Other forms of renewable energy, such as wind power, solar, geothermal, and biomass energy, have not seen similar interest or development on the Ashley National Forest. This is partially due to the low potential for these resources, relative to other areas in the country. It is also because of competition from abundant nonrenewable energy sources, such as crude oil, natural gas, and coal in the immediate and surrounding areas (Forest Service 2017L)."Suggested change: "Other forms of renewable energy, such as wind power, solar, geothermal, and biomass energy, have not seen similar interest or development on the Ashley National Forest. This is partially due to the low potential for these resources, relative to other areas in the country. It is also because of competition from abundant nonrenewable energy sources, such as crude oil, natural gas, and coal in the immediate and surrounding areas (Forest Service 2017L). However, interest in renewable energy development is increasing and may result an increase in future development interest on the Ashley National Forest."Interest in renewables is increasing and should be acknowledged.

Ch. 3, Page 263, Renewable Energy"Renewable energy projects would not be permitted in these areas but would still be permitted across the rest of the national forest."If renewable energy development is possible within the FGNRA, the stipulations for development in the State of Wyoming Greater Sage-grouse Core Area Protection Executive Order 2019-3 (or current) should be acknowledged. Sage-grouse Executive Order-related restrictions should be acknowledged when discussing any new development in Wyoming in core or non-core area habitat.

SHPO CommentsCh. 3, Page 230, Cultural ResourcesTable 3-66, Add the Lucerne Valley Petroglyph SiteWhile in the Flaming Gorge area, this recently listed historic property is also within the bounds of the Ashley and should be included here.

Appendix E, Attachment B, Page 108, Cultural and Historic ResourcesTimeline not included.Suggested change: This plan will be developed within one year of implementation of the forest plan.Sets a timeframe for accomplishing this task. This should also be included as a goal.

Appendix E, Ch. 2, Pages 38-39, Cultural ResourcesAddresses issues not identified in the plan.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 not rise to the level of having a specific management area designated to them. The Ashley will share the list of priority heritage assets with the appropriate Native American Tribes and Federal, state, and county officials upon request. The Ashley will also readily consider suggestions to include on the list for the Forest.

State Parks Comments Ch. 3, Pages 184-185, Tourism and Recreation A table showing documented visitation for past surveys and projected trends should be included so that data is easily noted. This forms the basis of recreation arguments throughout, but does not feel readily available or easy to digest. Ch. 3, Pages 184-185 and 195, Tourism and Recreation Is data available for various types of recreation? Wildlife-related user groups are mentioned on page 195, but a more complete table better defining the many uses seen in the Ashley would be useful. Some of this is presented later in Chapter 3 around page 278-279 but more charts, trends, and data would be helpful. This data forms the basis of recreation assumptions made throughout this plan and, along with public comment, influenced the development of the various alternatives. Ch. 2, Page 15, Sustainable Recreation "Management is provided based on an assumption of moderate to heavy levels of dispersed recreation projected for the Ashley National Forest. What are the numbers and expected trends to justify this assumption? 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. Ch. 2, Page 16, Social and Economic Contributions "Alternative A is focused on a commodity-based approach and emphasizes economic output associated with forest resources. The economic importance of recreation is not emphasized, and contributions from ecosystem services are not specifically addressed. This feels inconsistent with other goals of the plan. On page 10, Sustainable recreation was identified as a key focus of this plan. On page 15, recreation management is tied to an assumption of moderate to heavy levels of recreation. 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. Ch. 2, Page 19, Social and Economic Contributions "Under alternative C, as under all alternatives, social and economic contributions from the Ashley National Forest would be retained. Address how the shift towards backcountry and non-motorized recreation may shift the economics of the Forest. The economic multipliers are different across various recreation sectors. 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. Ch. 3, Page 47 and 71, Effects from Recreation There is no discussion in this document about sustainably built trails and other amenities which can mitigate or lessen the effects that trails and other recreation amenities can have on the environment. Seasonal closures and limited visitation are other potential management tools. \*This is not the only section that this comment applies to- also relevant in watershed conversations, wildlife impacts, recreation, etc. If alternatives are dismissed or graded on conditions that do not meet the best practice standards of the industry, the analysis of the four alternatives is flawed. Ch. 3, General Comment on Objectives Objectives are mentioned throughout the Chapter 3 but are rarely clearly stated and easy to track throughout the analysis. No goals or options for meeting those objectives are given/or are rarely given. See above comment about best practice standards and sustainable recreation/development standards. Construction does result in vegetative loss but can be guided to occur in less sensitive areas, can include

restoration plans, etc. Ch. 3, Page 78, Effects from Designated Areas Section is missing from this page? Ch. 3, Page 217, Areas of Tribal Importance 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. Ch. 3, Page 274, Recreation Need more information on conditions that apply to the well-developed Flaming Gorge National Recreation Area and how that area will be addressed in a separate plan. The development pressures in the FGNRA are different; their treatment will impact use in other zones of the Forest. Developing alternatives focused on one type of use, or even for one type of recreation, is a disservice to how many resources and services come from the Forest. Failing to adequately address the recreation desires of various audiences can also lead to resource degradation. Education is a major component as is providing different recreation groups opportunities across a geographical area (ie, motorized trail users should have opportunities to recreate within a certain radius of their home, but it doesn't need to be on Forest land if there are better alternatives). That requires partnerships, regardless of the Alternative selected. There needs to be more specific direction on how the FGNRA will be managed to maintain recreation opportunities and become a destination recreation area. This plan should be coordinated with the WY Outdoor Recreation Office as well as SW county planning. 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. Many Wyoming partners have expressed a desire to better coordinate use of the visitor centers and other local tourism resources to advertise recreation opportunities at FGNRA and to attract customers and users. 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. 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 whereby 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. Need a goal for what kind of visitation increases are desired. Identify where visitors are being drawn from- local backyard users, or visitors coming from further distances impacts management considerations. The Forest Service should help the state and local governments meet their economic diversity goals in relationship to developing the outdoor recreation industry. 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. Setting a goal in the plan is important as it impacts management and development pressures. FS should be a partner in supporting state plans to enhance outdoor recreation opportunities and industry. Can make use of the 1,200 miles of trails. Non-motorized single-track trails are developed to create a destination opportunity for mountain biking, horseback riding, and hiking creating a socio-economic benefit for residents and visitors alike. 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. Demand indicates the need for motorized trails in the system, but curated placement and access to supporting infrastructure and consideration of other critical Forest aspects is key to resource protection. Ch. 3, Pages 283, 302, and 305, Special Permits/Authorizations and Land Authorizations Assumption is made that there will be no increase in special recreation permits, but demand is increasing for all types of authorizations. (not quoted directly as language varies) How does the assumption that permits will not change square with the demand increasing? Needs more explanation as it will impact the level of development, public messaging, etc. Ch. 3, Page 284, Effects from Recreation Management Area Designations Recreation is spelled incorrectly on the last line of the page. Ch. 3, Page 287, Effects from Recreation Opportunities and Settings "This alternative offers the most opportunities for recreation users seeking remote locations with few management controls on the ground, no facilities, and large areas offering solitude. Recreation users seeking developed recreation would have fewer opportunities under this alternative, compared with alternatives A and B. In addition, due to the emphasis on a primitive ROS setting, recreation users interested in both motorized and mechanized use may have fewer recreation opportunities under this alternative as

compared to all other alternatives."Better define recreation trends, show visitation data and recreation area usage, and development pressures to explain the development of the four alternatives. If most of the recreation pressure is on developed areas like the Flaming Gorge National Recreation Area, addressing backcountry users may not solve problems facing the Forest. Need to prove balance of backcountry, dispersed, and developed camping and other recreation uses to justify development. Show balance in accommodating multiple uses.Ch. 3, Page 288This entire page seems to suggest that Alternative D has minimal impacts but that doesn't pencil out when looking at the acreage impacts, the recreation use impacts, and other expected outcomes.Ch. 3, Page 293, Table 3-82. Scenery Management by AlternativeThe partial retention scenery management category seems quite high for Alternative D, and brings up questions about sustainable design of recreation resources.Ch. 2, Page 20, PartnershipsIn general, we are supportive of the Forest working to build partnerships with local, county, state, and other land management partners. We would like to see this ethos expanded to connect the other alternatives as it should be a general goal, not a component of one alternative.State Parks General CommentsIn general, it would help to see more information about current conditions aligned with desired conditions.Consistent formatting with more opportunities to see side-by-side comparisons of the four alternatives would make the document easier to read and would aid in providing consistent analysis.The alternatives presented fail to strike a balance between recreation desires and resource protection, and do not provide balanced opportunities for the many types of recreation that Forest users wish to see. We want to see more proactive management.

February 15,2022Sue EickhoffForest SupervisorAshley National Forest355 North Vernal Ave.Vernal, Utah 84078Supervisor Eickhoff:Thank you for the opportunity for the State of Wyoming to comment on the Draft Environmental Impact Statement (DEIS) for the Ashley National Forest Plan Revision.National Forests, including the Ashley National Forest (ANF), are essential to our economy, citizens, and visitors. The forest plan revision process is key to the management of national forests and integral to the future of states and forest adjacent communities since the Plan Revision will guide management decisions on the forest for the next 15 to 20 years.The ANF Plan Revision process has been ongoing for over five years. The State of Wyoming has participated diligently in the process as a cooperating agency, submitting hundreds of comments and attending many meetings. At times, we have been frustrated by a lack of responsiveness from the ANF to our comments and concerns. Still, we appreciate the renewed effort to engage cooperators, fully understand our issues, and provide more than dismissive justifications for our concerns.Attached you will find comments from the State of Wyoming. In an effort to be as helpful and clear as possible, many comments include suggested language changes. There are also a number of general comments that apply to either an entire resource section of the DEIS or the DEIS as a whole. The ANF is encouraged to review the comments provided by Wyoming state agencies closely, and please contact us if you have any questions or need further clarification. On behalf of our state cooperating agencies, we request the ANF provide us the opportunity to discuss the potential agency preferred alternative.Sincerely,Mark GordonGovernorAttachment BelowGovernor's Office CommentsThe comments from the Governor's Office are intended to highlight some of the largest perceived issues with the DEIS and are not all inclusive. Some of Wyoming's comments are broad and only involve a certain example, but should be reviewed against the entirety of the document. The Ashley NF is encouraged to closely review the comments provided by Wyoming state agencies for further detail on specific topic areas.The DEIS is clunky and often confusing. In many instances the chains of logic are incomplete, phrases are interchanged, or analyses are simply divergent. State agencies have identified many of these areas but all share concerns surrounding the validity of the analysis across the DEIS. In some instances, the FS is dangerously close to appearing pre-decisional on a preferred alternative. This is a result of analysis that guides the reader to the superiority of alternative B over the other alternatives, rather than providing analysis against an unbiased baseline for each resource area in each alternative.The DEIS lacks clarity on how the Flaming Gorge National Recreation Area planning process will be influenced by the Ashley Forest Plan Revision and how that process will proceed.Ch. 3, Page 323The DEIS only lays out the legal requirement for the FS to perform a consistency review between the alternatives and state/county land use plans and policies. It does not provide an analysis of the consistency between the alternatives and the relevant plans and policies. The stakeholders and public should be made aware of any analysis completed and analysis completed in the past should be reviewed in light of any changes that may have occurred or conditions that may have changed.The State of Wyoming is supportive of maintaining

multiple use on FS land, which is inhibited by additional designations of wilderness areas and other restricted areas, such as backcountry recreation areas. The State of Wyoming is concerned about the use of natural ignitions as a management practice to meet objectives. WDA Comments Ch. 2, Page 23 Annual Vegetation Treatment: Alternative C "No comparable plan components. should read "Same as Alternative A" Ch. 2, Page 24 Example: Alternative A: Ch. 2: "Utilization and stubble height based on land health standards." Alternative B: Ch. 2: "50% utilization and 4 inch stubble height guidelines with exceptions where different height will meet desired conditions VERSUS Alternative A: Appendix B: "Limit forage utilization by livestock of key browse species on big game winter range to 20 percent." or Alternative B: Appendix B: "To ensure sustainable and resiliency of forage resources, limit utilization of key forage species to no greater than 50 percent of current year's growth, unless long-term monitoring demonstrates a different allowable use level is appropriate." Appendix B Language Comparison of Action Alternative Plan Components differs greatly from Ch. 2 Comparisons Table. Concern of what language will go into FEIS and Preferred Alternative. WDA does not support a site specific utilization level or stubble height in the Land Use Plan. As stated in previous comments, we believe this is a project level decision. Each allotment has different ecological sites, including different soils, vegetation, and precipitation. Therefore, utilization levels should be determined individually under project level NEPA. Ch. 2, Page 25, Table 2-2 Example: Alternative A: Ch 2: "Sheep Allotments remain unutilized for a period of 5 years may be considered for conversion to another class of livestock or closed" VERSUS Appendix B: No comparable guidelines under Alternative A." Alternative B: Ch 2: "New domestic sheep or goat allotments would not be authorized unless separation..." VERSUS Appendix B: Alternative B: "New permitted domestic sheep or goat allotments should not be authorized..." Appendix B Language Comparison of Action Alternative Plan Components differs greatly from Ch. 2 Comparisons Table. Concern of what language will go into FEIS and Preferred Alternative. WDA does not support the range of alternatives related to domestic sheep and bighorn sheep. Ch. 2, Page 26, Table 2-2 Destination Recreation Areas for Grazing compare permitted acres. Table should compare the number of HMs/AUMs permitted in DRAs including the number reduced under Alternative C. Ch. 3, Page 49 "Over the life of the plan, livestock grazing management that results in improvements to land health conditions would maintain the soil condition." Suggested change: "Over the life of the plan, livestock grazing management that results in improvements to meeting desired conditions..." Plan language needs to have consistency throughout to tie back to guidelines and determine if desired results are met. Ch. 3, Page 50 "This desired condition is being met in rangeland areas, except where soil conditions are deteriorating." There isn't a direct correlation with existing livestock grazing management, utilization levels, stubble heights, and deteriorating soils. However, this section of the analysis assumes livestock grazing may be the causal factor for deteriorating soils. Shallow soils, wind swept ridges, headcuts, recreation, etc. are all other ecological factors to consider for deteriorating soils. The analysis must consistently analyze the resources and causal factors equitably with use of monitoring data. Ch. 3, Page 52 "Alternative B would provide specific utilization and stubble height guidelines that could be increased or decreased depending on the soil conditions..." The Plan lacks clear parameters for what desired conditions are and how to achieve them. As stated in the soils section, soils are one of the resource determinants if deviations from 50% utilization may occur. Given the lack of clarity for soils desired conditions, no deviations from 50% utilization will occur. WDA cannot support this language as proposed. Ch. 3, Page 53 "This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height exceeds 4 inches." Suggested change: "This would implement a 40 percent utilization level and 4 inch stubble height level." While WDA does not support the alternative, the language in the plan is inconsistent and inadequately analyzes the actual impacts between the alternatives. Ch. 3, Page 54, Effects from Grazing "Similar to alternative A, alternative D would not include specific utilization or stubble height guidelines. Impacts on soils under alternative D would be the same as those described under alternative A." Suggested change: "If desired conditions are not met under alternative D, then site specific adjustments will be made accordingly." Desired conditions need clear definitions and parameters for meeting. Alternative D would not be the same, because if desired conditions were not met under D, then the allotments would require adjustments accordingly. Ch. 3, Page 65, Table 3-8 Total Average Size (Acres) The math doesn't average when totalled and divided. Need to redo the math and provide an explanation how average acres are determined. Ch. 3, Page 73, Effects from Livestock Grazing "Approximately 1,000,700 acres of active allotments.." Alternative C, page 24 states 919,700. Ensure acreages are accurate under each alternative and analyzed consistently throughout the Plan. See also page 248. Ch. 3, Page 79, Effects from

Livestock Grazing" Livestock grazing would be restricted in destination recreation areas under alternative C. This would remove 13,000 acres from grazing and would eliminate potential impacts on water quality for streams..." Are all DRAs in or near streams? This section is out of place. No other alternative compares the environmental impact by livestock grazing. Ch. 3, Page 80, Effects from Livestock Grazing" Alternative C would reduce acres available for active grazing allotments by 130 acres..." Suggested change: "Alternative C would reduce acres available for active grazing allotments by 13,000 acres." Ch. 3, Page 81, Effects from Livestock Grazing" This would remove 2,100 acres of riparian vegetation and 600 acres of wetlands..." This is the first time a breakdown of the type of acres in the DRAs. The analysis is incomplete by only analyzing the impacts from grazing and lacks the increased impacts from trampling by increased recreation use. Examples will include trampling of vegetation, eroding of streambanks, creation of trails, by humans and vehicles. WDA urges the Plan to acknowledge and analyze the impacts to DRAs by other uses. Ch. 3, Page 108, Effects from Veg" Under alternatives B, C, and D, vegetation treatments would occur over every decade following plan implementation..."

"The total for mechanical timber oriented treatments is approximately (rounded to the nearest 100 acres) 1,500 acres for the first decade and 1,200 acres for the second decade." Page 24 states vegetation treatments will occur on an annual basis, not decade. We recommend reviewing the Plan in its entirety to ensure an analysis consistency. Ch. 3, Page 118, Effects from Veg" Alternative C aims to treat 1,000 acres in the first decade and 800 acres in the second decade." Page 24 states vegetation treatments will occur on an annual basis, not decade. We recommend reviewing the Plan in its entirety to ensure an analysis consistency. Ch. 3, Page 118-119, Effects from Rec" Livestock grazing would be excluded from destination recreation areas (23,000 acres). However only 13,000 acres currently have active grazing, therefore reduction of potential effects to terrestrial vegetation would be limited to this area." The analysis misleads the reader to believe the reduction of livestock grazing from 13,000 acres is actually a benefit. However, it could potentially be a negative, with increased fine fuels for wildfire, shifting plant communities to a monoculture, as well as neglecting to include the increased trampling from recreation users, such as tents, fisherman walking the stream banks, loss of vegetation for increased facilities, etc. Ch. 3, Page 119, Effects from Grazing" Alternative C would have reduced acres (13,400 acres closed) available for active grazing allotments and fewer HMs, compared with Alternative A." The Plan inconsistently describes how it will implement DRAs and remove livestock grazing from these areas. Some resource section analysis states "exclude" while this section states "closed." We do not support "closure" of allotments, as these areas were already adjudicated and delineated for grazing livestock. USFS Handbook 2209.13 Chapter 10, 16.6 states "Grazing permits may be canceled in whole or in part where a decision has been made to devote certain National Forest System lands to another public purpose that precludes grazing by permitted livestock. Except in an emergency, do not cancel a permit without a two-year notification (36 CFR 222.4(a)(1))." WDA is concerned the permittees with grazing allotments in the DRAs have no idea their permits may be canceled. Additionally, the DRAs were estimating excluding livestock from 13,000 acres, not 13,400 acres as stated. The analysis lacks any indication of impacts or benefits to livestock grazing permits from vegetation treatments and the differences between the sizes of treatments across the range of alternatives. Ch. 3, Page 120, Effects from Grazing" This provides flexibility for grazing management and may result in utilization levels higher or lower than 50 percent and reduced or increased stubble heights ..." "Without a defined stubble height guideline for key forage species, grazing below 4-inch stubble height may prevent key forage species from reestablishing..." Given this analysis is comparing Alternative D to A, and Alternative A does not have 50 percent utilization or 4-inch stubble height limits, this analysis is flawed. Additionally, the analysis is biased. The Plan neglects to accurately convey how each permit and allotment has annual monitoring, Allotment Management Plans, Annual Operating Instruction meetings and plans; all of which guide livestock grazing to meet desired conditions. Finally, this section neglects to include any impacts or benefits to livestock grazing related to the annual vegetation treatments. WDA recommends the Plan include these treatments in the analysis across all resources under the Terrestrial Vegetation section. Ch. 3, Page 146, Big Game The big game section completely excludes non-native mountain goats. This is imperative to divulge, not only the population of mountain goats, but also their geographic location and distribution. The geographic overlap with bighorn sheep is a major concern given the likely pathogen transmission between the two species. Ch. 3, General Comment WDA urges the USFS to include language regarding the Statewide MOU for management of bighorn sheep. This document was signed by the USFS and includes direction in which the agencies should work to manage the species, while not at the expense of

removing domestic sheep from public lands.Ch. 3, Page 147, Bighorn Sheep"Bighorn Sheep were reintroduced on the Ashley National Forest in 1983."WDA understands the first reintroduction was in 1989 not 1983, and all bighorn sheep on the Ashley are a result of translocation. We are greatly concerned this section inadequately provides the history of the original translocation sites, acknowledging the translocation occurred with active domestic sheep grazing, distances of original translocations of bighorns from existing and active domestic sheep allotments, distance bighorns have dispersed from the original translocation sites, UDWR's original intent and level of risk for translocation, etc. The Plan must also tie back to a viability/persistence analysis, followed by how the range of alternatives addresses viability of bighorn sheep.Ch. 3, Page 161, Effects from Grazing"Deer may avoid sites with high cattle utilization (Collins and Urness 1983), and reproductive success may be lower in areas with high cattle stocking rates (Smith 1984). In addition to habitat alterations, domestic livestock grazing can have adverse effects on bighorn sheep populations by increasing competition for space and forage."Suggested change: Remove statementThe Plan's analysis lacks the UDWR's population objectives for big game species. Statements such as those provided are conveying domestic livestock as a causal factor for reducing reproductive rates due to excessive stocking rates. The Plan also lacks the information to determine if bighorn sheep on the Ashley actually overlap with active domestic livestock grazing allotments. More specifically, there should be no overlap with domestic sheep and there is little to no high elevation cattle grazing where bighorn sheep are found. If there are closed allotments this also needs included. We believe this is imperative to divulge in the Plan and analyze accordingly. Finally, these studies are old and unlikely an actual issue. WDA recommends removing this statement.Ch. 3, Page 162, Effects from Grazing"The absence of forest-wide forage utilization guidelines could result in relatively higher levels of impacts (for example, from reduced vegetation cover)..."The analysis is biased and ignores the fact that each permit has individual NEPA to analyze impacts.Additionally, each permit is accompanied by an AMP, annual monitoring data, with the ability to make grazing management changes prior to the turnout of livestock the following grazing season. WDA is concerned how the analysis leads the reader to believe the Plan is the only regulatory mechanism to guide grazing, and ignores the benefits of well managed livestock grazing to actually improve wildlife habitat. WDA recommends reviewing the Plan for these biased statements and revising accordingly. Again, we oppose a forest wide utilization guideline."Lower stubble height and higher forage utilization would cause plant communities to shift towardnon-palatable or grazing-tolerant species which would reduce forage for native ungulates such as bighorn sheep."A suitability analysis would identify where cattle grazing is acceptable and where these allotments, if at all, overlap with bighorn sheep. Domestic sheep are managed to keep separate from bighorn sheep, therefore they can not contribute to reducing forage for bighorn sheep. The plan fails to include monitoring data related to habitat and forage as it relates to wildlife. More specifically, bighorns on the Ashley are translocated and should not be considered "core native."Ch. 3, Page 162 Effects from Des. Areas"Under Alternative A, existing designated areas would remain, but not new management..."The Plan must identify the number of acres remaining under Alternative A.Ch. 3, Pages 167-168, Effects from Rec and Table 3-40"Specifically, destination recreation MAs, which emphasize developed recreation experiences in high-use areas with motorized access and support facilities, would have the greatest level of impacts on wildlife and at-risk species." Destination Recreation Areas overlapping Rocky Mountain Bighorn Sheep CHHRThe Table states under each alternative how much overlap with DRAs across bighorn sheep CHHR acres. This should cause great concern given the Plan must reduce impact to ensure persistence of bighorn sheep. WDA insists the Ashley identify and analyze the negative impacts due to stress for bighorn sheep from recreation.Ch. 3, Page 172, Effects from Grazing"Compared with Alternative A, this would improve habitat conditions for wildlife and at-risk species within active allotments."If each allotment has an AMP with benchmark indicators, as stated on page 162, then the statement comparing Alternative B to A is flawed. The Plan has to transparently identify where and why the benchmark indicators at the project/permit level have not worked or provided the appropriate habitat for wildlife. The Plan neglects to include any specific information where wildlife habitat needs improved or how livestock grazing under Alternative A has caused reduced populations, reproduction, or displacement."Forest plan components would help to address the threat of pathogen transfer from domestic sheep to bighorn sheep by providing separation when a permit is waived without preference. Where bighorn sheep cannot come in contact with domestic sheep, disease transmission is significantly reduced or eliminated."The Plan's analysis related to domestic sheep and bighorn sheep is flawed. The analysis does not provide information related to how bighorn sheep left their original translocation site and



are now directly adjacent to active domestic sheep allotments. Under Alternatives B, C, and D, they all rely on current permittees waiving without preference. The encouragement of permittees to waive without preference only comes when buyouts by conservation organizations are offered to permittees and often exceed the actual value of the permit. WDA does not support the range of alternatives as proposed and does not support the analysis. The analysis simply restates the guidelines from Chapter 2, but completely neglects to tie how the guideline addresses the persistence of bighorn sheep. The Plan lacks how much actual separation is needed between domestics and bighorns. This amount of separation will likely decimate the domestic sheep grazing industry on the Ashley. Finally, the Ashley must divulge the reality that bighorns in the project area already carry diseases and acknowledge how additional stressors such as winter snow conditions, recreation, and others can negatively impact bighorns and cause die offs. "...provide separation of domestic and bighorn sheep when a permit is waived without preference by 1) providing separation that would mitigate the threat of pathogen transfer from domestic sheep and goats to bighorn sheep, consistent with the most current state big horn sheep management plans; 2) adjusting the time or dates, or both, when domestic sheep are on the allotment; 3) potentially converting the allotment to a cattle and horse allotment; 4) using the allotment as a cattle and horse forage reserve; 5) potentially closing all or a portion of the allotment to domestic sheep and goats." Alternative B is not a reasonable alternative for the following reasons: 1) the amount of separation needed to address foraging rams would essentially remove all domestic sheep from the Ashley. 2) high elevation grazing already is limited with late snow run off and greenup of forage, shifting the dates earlier or later is unreasonable. 3) the potential of a conversion is not only unlikely, but the reality of cattle actually grazing at the high elevation makes this unreasonable, 4) you have to convert to cattle first under 3, then only get limited use under a forage reserve. 5) potentially closing the allotment is not acceptable. The allotments are already adjudicated and delineated for grazing. Closing the allotments takes this off the books, eliminating grazing in perpetuity, regardless of potential vaccines, etc. We are very concerned the Ashley has not addressed our previous concerns regarding the Proposed Action and Range of Alternatives. We insist on a complete revision of the alternatives related to domestic sheep and bighorn sheep.

**General Comment regarding allotment closures** As a conservation organization or agency by intent, nature, and statute, the Ashley NF EIS is not meeting or implementing these principals. Closure of allotments is discouraged by FS Manuals, yet the Ashley is knowingly and willingly proposing closures throughout the DEIS when the allotments are already deemed suitable and capable. By closing any allotments, the Ashley removes the allotments from future use given changes in livestock management, scientific changes, or other actions. The Forest Plan is narrowly analyzing and making decisions based on current conditions, with no room for management decisions to address the likely changing conditions throughout the life of the Plan. Ch. 3, Page 174, Effects from Grazing

Alternative C would have fewer acres with active grazing (13,400 acres closed) and fewer head months (HMs) available relative to all other alternatives. Compared with alternative A, this would reduce the extent of impacts on wildlife and at-risk species from livestock grazing. The acreage for DRAs is inaccurate. The analysis neglects to compare the difference in impacts to wildlife in the DRAs comparing livestock impacts and increased motorized vehicles and recreation. Closure of the DRAs from grazing is unacceptable. This would modify and require additional project level NEPA to delineate new allotment boundaries and by USFS regulations require existing permittees two years notification. Relative to the other action alternatives, this alternative would include additional and more stringent plan direction for separation... Components would include a guideline that would close allotments where permits are voluntarily waived without preference if the allotment does not provide separation between domestic sheep and goats... Additionally, new domestic sheep or goat allotments would not be permitted unless separation from wild bighorn sheep is demonstrated ((FW-GL-WL-10) and domestic sheep and goat allotments that overlap bighorn sheep core herd home range would be closed when opportunities arise (FW-GL-WL 11). Alternative C is not a reasonable alternative for the analysis. Closure is not equitable to or synonymous with separation. Closure of these allotments will remove all domestic sheep from the Ashley due to bighorn sheep, which is a violation of the Statewide Bighorn Sheep Management Plan, and does not meet the original intent by UDWR when bighorns were translocated in 1989. Currently bighorn sheep have full access to inhabit anywhere on the forest, thereby creating and expanding core herd home range. The delineation of core herd home ranges with unmanaged bighorn populations to close domestic sheep allotments when opportunities arise causes us great concern. It is not the Ashley's responsibility to expand bighorn sheep across the forest, rather to ensure persistence when

possible. The range of alternatives is inadequate and does not provide any certainty or assurance for the domestic sheep permittees to successfully graze in the future. Additionally, there are no management actions, guidelines, or standards to address foraging rams, which are more of a significant risk to existing bighorn herds. WDA encourages the Ashley to identify plan components to address foraging bighorn sheep and include this as part of the persistence analysis. General comment, Bighorn Sheep The range of alternatives for bighorn sheep near domestic sheep is grossly inadequate. While waiving without preference may be conveyed as voluntary, one permittee's decision to waive without preference should not determine the fate of the domestic sheep industry as a whole. The range of alternatives should include one or more alternatives in favor of domestic sheep maintaining existing permits without additional pressures of bighorn sheep. The boundaries of domestic sheep allotments have not changed since the original translocation, but the permittees are required to manage their animals to ensure separation of bighorn sheep. Additionally, the analysis in Chapter 3 does not actually analyze the guidelines under each Alternative. Rather, they simply repeat the verbiage from the alternatives. The analysis should actually be tied back to the persistence analysis. There's no width to the proposed analysis and all are contingent on existing permittees waiving without preference. The alternatives should assume permittees are going to graze in perpetuity and incorporate voluntary best management practices where appropriate. Appendix B Table B-2 includes Guidelines related to new permitted sheep and goat allotments, as well as exclusion of pack goats. While WDA supports the use of pack goats for those who choose to use them and believe you can adequately manage pack goats, the analysis lacks any information if there are pack goat permits currently issued, how many, and if they are currently permitted in bighorn sheep CHHR. We also believe the Plan should analyze the permitting of pack goats equitably with domestic sheep. As proposed, we believe this is inconsistent with the Plan analysis. Ch. 3, Page 176, Effects from Rec"Compared with alternative B, impacts on wildlife and at-risk species due to recreation would increase. At risk species that are sensitive to disturbance, such as fringed myotis, may experience increased disturbance...However, plan components to reduce disturbance to caves would reduce the threat of disturbance..."While the Plan may include a plan component to reduce humans from entering caves, it's unclear if there are caves impacted in the DRAs. Additionally, the analysis lacks how other at risk species are impacted by DRAs or other management areas. There are no equitable plan components for addressing human disturbances, i.e. sage-grouse, bighorn sheep, etc. As proposed, the analysis simply compares acres designated or not. This isn't an actual impact analysis, which we believe must be addressed."Unlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduced habitat features such as forage and cover."Alternative D on B-11 states "Utilization of key forage species meets desired conditions for soils and terrestrial vegetation," not "land health standards."" Desired conditions for terrestrial vegetation under Alternative D takes into consideration of wildlife habitat forage and cover. Annual changes would be made during the development of the AOI prior to turnout of livestock to ensure desired conditions are met. The analysis is biased and misleads the reader to believe only Alternatives B or C are acceptable."Relative to the other action alternatives, this alternative would include less stringent plan direction for separation of bighorn sheep from domestic sheep...but it does not specify how it is to be done. This leaves the option open on how to achieve separation or mitigation."Alternative B does not provide the specifics as stated. The Plan simply states it will provide separation. Alternative C closes the allotments, which is not separation. It's simply an elimination of domestic sheep grazing from the Ashley. Additionally, D-9 states transmission of respiratory pathogens occur between individual bighorns, yet the Plan neglects to include any plan components to address this ongoing issue or inclusion of species overlap with mountain goats and likely reason(s) for not meeting persistence. Ch. 3, Page 196, Livestock Grazing"For changes under alternative C due to exclusion of livestock from destination recreation areas, the Forest Service used a GIS analysis to locate pastures..."This section is an economic impacts analysis. However, there is no economic tie to the reduction in HMs due to DRAs. Ch. 3, Page 210, Env. Consequences"Whether the entire pastures would be closed would depend on whether the management areas could be managed to restrict cattle (for example, with fencing, natural barriers, or herding). The statement is genuinely concerning. The Plan is excluding/closing the DRAs by 13,000 acres under Alternative C. However, this now states it could be more, but it's to be determined. This is completely excluded from the range of alternatives Chapter 2 and drastically changes the analysis in both livestock grazing

and recreation sections.Ch. 3, Page 248, Analysis Area"919,700"1,000,700 found on page 73.Ch. 3, Page 249, Table 3-70, General CommentThe Table includes allotments in the Flaming Gorge. Is the Ashley Plan Revision including the allotments and acres in the Flaming Gorge Plan? WDA urges the clarity of this.Ch. 3, Page 249, Description"Market demand for livestock products in the U.S. is expected to slowly decline over the coming decades..."This alludes to people no longer eating meat, yet as the population increases, demand for beef and lamb is likely to increase. Remove this statement.Ch. 3, Page 250, Indicators"Total acres open and closed to grazing"The Ashley Plan neglects to identify the number of allotments closed. We are aware of allotments closed from domestic sheep grazing in proximity to bighorn sheep herds. WDA believes this should be included in the Plan by developing a range of alternatives to review the closed allotments and consider reopening them to active grazing where appropriate. Closing an allotment based on an individual permittee's decision, as is the case with waiving without preference and taking a buyout is not representative of the industry's current need for grazing allotments.Ch. 3, Page 252, Effects from Veg"For example, expansion of bighorn populations could result in the need to modify management of domestic sheep allotments to minimize contact between these populations."The Ashley Plan should not allow expansion of bighorn sheep populations when it negatively impacts domestic sheep allotments. As previously stated, it is not the Ashley's responsibility to expand bighorn sheep populations, rather to identify plan components to ensure persistence if possible. This is in direct violation of the intent behind the translocations as well as the Statewide Bighorn Sheep Management Plan. Remove this language.This only further indicates the intent to permanently remove domestic sheep grazing from the Ashley.Ch. 3, Page 253, Effects from Grazing"Without Forest-wide guidelines, different forage use direction could be proposed. This could lead to inconsistent and subjective grazing management across the Ashley National Forest, potentially reducing plant resiliency and forage production."This is a false and misleading statement. Under Alternative A, only one out of 123 watersheds are not meeting desired conditions. This indicates current grazing management using site specific forage utilization and stubble heights at the allotment level can work. It is inappropriate to misapply and misanalyze the Plan's authority, when there are existing regulations for grazing, including project level NEPA, AMPs, and AOIs."Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches..."Again, the wording in the Plan is inconsistent throughout and needs consistency. Alternative B is limited to 50 percent utilization of key forage species.General CommentThe Ashley DEIS is narrowly written with alternatives such as limiting use to 50% of key forage species and 4 inch stubble height. The DEIS should provide a much broader allowance of vegetative use to include exceptions on a site-specific basis by encouraging experimentation or innovation. Given the Plan must address climate change, the range alternatives completely prohibits using targeted grazing to address changing conditions, invasive species, or address changes in plant communities.Ch. 3, Page 255, Effects from Sus. Rec"These [sic] is a small potential [sic] for the need for closures of additional acres in pastures where cattle could not be effectively restricted, resulting in additional loss of HMs. These impacts would be determined at the site-specific level during implementation. Specific operators may be impacted under this alternative, though those impacts are likely to be minimal."This is unacceptably open ended. The Plan analysis limits excluding livestock from DRAs at 13,000 acres. As proposed, it's imperative for permittees potentially impacted to have full transparency of the impacts to their allotments and operations. The Plan neglects to include the economic impacts from the closure of allotments already, let alone the additional loss of acres and HMs as indicated.Ch. 3, Page 256, Effects from Veg"Alternative D would not have management direction to close or convert any existing sheep or goat allotments. Allotments that would be considered for conversion or closure under Alternative A would not be affected under alternative D."B-12 states Alternative A is "No comparable guidelines under Alternative A." Alternative D states: "When a domestic sheep or goat grazing permit for an allotment is voluntarily waived without preference, and if the allotment does not provide separation from bighorn sheep, then authorized use of the allotment should either provide separation of domestic sheep/goats from bighorn sheep or mitigate the threat of pathogen transfer from domestic sheep/goats to bighorn sheep or mitigate the threat of pathogen transfer from domestic sheep/goat to bighorn sheep [sic]." The comparison of the Alternatives is not only inaccurate, but not an actual analysis to determine how Alternative D is better than alternative A when working towards meeting persistence.Appendix D, Pages D-23 and D-25 and Appendix E, Page E-28, Greater Sage-grouse"Also included is a component specific to greater sage-grouse that would stipulate 70 percent or more sagebrush communities have 10 to 30 percent sagebrush canopy cover, with less than 10 percent conifer canopy in greater sage-grouse

seasonal habitat."The Ashley Plan must follow the 2015 Sage-grouse Plan for both Utah and Wyoming, by incorporating the existing plan components into the DEIS. The Ashley Plan language is not consistent with the following language from 2015 UT Sage-grouse Plan: "PHMA[mdash]Maintain all lands ecologically capable of producing sagebrush (but no less than 70 percent) with a minimum of 15 percent sagebrush cover, or as consistent with specific ecological site conditions."App. E, General CommentThere is a stark difference in authorship in Chapter 2 Development of Desired Conditions, Objectives, Guidelines, and Goals. Some resources are well written with specific components such as Fisheries/Aquatics. For example: Objective (FW-OB-FIS-01) "Complete at least one project per year with design features to restore habitat or populations of aquatic species." This Objective directs the Ashley to implement projects to benefit the resource. The Guidelines are written broadly at the Forestwide Level. However, other resources such as Livestock Grazing are completely void of any project development, assurances to maintain allotments or AUMs, etc. The Guidelines are written at the project level and are regulatory in nature. WDA believes the Plan should revise the Draft to more uniformly develop plan components.App. E, Page E-21, Aspen

To help support sprouting and sprout survival sufficient to perpetuate the long-term viability and resilience of aspen clones, livestock utilization of key forage species should be limited to no greater than 50 percent of current year's growth, except where long-term monitoring and research demonstrates that a different allowable use level is appropriate."Suggested change: removeThis guideline is too prescriptive and should not apply across the forest. Rather allow project level NEPA to determine the appropriate vegetation objectives and management practices to achieve those objectives. Additionally, the exception only can occur with long-term monitoring AND research. The likelihood of implementing long-term monitoring specific to the different utilization levels for each project is unlikely.App. E, Page E-81, Destination Rec Areas, General CommentWDA is very concerned with the Ashley Plan regarding additional designations for recreation, including: Destination Recreation Areas, General Recreation Area, and Backcountry Recreation Areas, of which is 1,103,200 acres proposed under Alternative B. The 1986 Ashley Plan does not include these designations, which is found in Alternative A. The Plan neglects to include why these designations are needed, what regulations guide the designations, how Backcountry Recreation Areas differ from Wilderness, etc. It's even more concerning when these designations are actually reducing livestock grazing. Unlike the Wilderness Act, which retained livestock grazing as it predated the Wilderness Designation, the Ashley is now utilizing new designations with less authority, but without the same respect and retention for existing livestock grazing allotments and permits. Finally, we believe the range of alternatives and respective analysis lacks the width to show impacts from zero areas designated to the full width with the highest designation levels.App. E, Page E-93, MonitoringLivestock Grazing Monitoring Plan: "Are allotments meeting forest plan and allotment management plan utilization guidelines?"Suggested change: Add: How many Head Months actively grazed on an annual basis? Add: How many acres were actively grazed on an annual basis? Add: How many allotments were vacated, closed, or placed in forage reserves?

The Plan completely revolves around 50 percent utilization and 4 inch stubble height for livestock grazing. The Plan needs to include the listed Monitoring Questions for livestock grazing to identify how much grazing is changing over the years. This is important as it relates to future Plan Amendments, project level decisions, and the socio economic sections of those NEPA analysis.App. G, Pages 155-158, WildernessAlternative B: "The 10,335 acres were selected ... " Alternative C: "The 50,157 acres of recommended wilderness in Alternative C..."Table 2-3, Chapter 2 of the Plan had the following wilderness numbers, which do not match the Appendix G: Alternative B: 10,300 and Alternative C: 50,200.SEO CommentsCh. 3, Page 63, Water Rights

This objective includes securing water rights for waters not reserved, in accordance with state laws, for water needed on acquired lands and securing rights on reserved lands, if the reservation doctrine or other Federal law does not apply to the uses involved (Forest Service Manual 2451.22)"Suggested change: "This objective includes securing water rights for waters not reserved, in accordance with state law and interstate Compact constraints, for water needed on acquired lands and securing rights on reserved lands, if the reservation doctrine or other Federal law does not apply to the uses involved (Forest Service Manual 2451.22)"Any impoundment or diversion of waters of the State will require proper permitting. The proponent is advised to contact the SEO with specific plans for alterations or diversions to or from any stream channel in the State of Wyoming prior to commencing work.WGFD CommentsCh. 1, General CommentLanguage should be included in the introduction identifying that the Sage-grouse 2015 Amendment is being developed separately from the Ashely National Forest Revised Forest Plan and that once the plan is finalized, it will be included in the

Ashley Plan.Ch. 3, General CommentWe recommend the Midget Faded Rattlesnake be added as a species conservation concern. The population on the FGNRA is distinct and experiences restricted gene flow from the rest of the range. However, the restricted gene flow has allowed the subpopulation to maintain genetic purity, unlike other subpopulations that have hybridized with Prairie Rattlesnake. Genetic purity enhances the importance of maintaining the subspecies on the FGNRA. In addition, documented den densities for Midget Faded Rattlesnakes on the FGNRA are among the highest recorded. As such, we recommend the Ashley National Forest formally acknowledge the importance of protecting this segment of the population.Ch. 3, Page 146, Big Game"Elk numbers have increased significantly over the last 30 years. An upward trend in the elk population is predicted for the next plan period (Forest Service 2017a), but ultimately trends for all big game species will depend on big game management by the Utah Division of Wildlife Resources (UDWR)."Suggested change: "Elk numbers have increased significantly over the last 30 years. An upward trend in the elk population is predicted for the next plan period (Forest Service 2017a), but ultimately trends for all big game species will depend on big game management by the Utah Division of Wildlife Resources (UDWR) and the Wyoming Game and Fish Department (WGFD)."WGFD manages elk in the portion of the Ashley NF that extends into Wyoming.Ch. 3, Pages 147-148, Greater sage-grouse"Although there are many locations of greater sage-grouse on the Ashley National Forest, greater sage-grouse occurs at relatively low numbers on the Ashley National Forest when compared with other areas of its range (Forest Service 2017a). Sage-grouse habitat on the Ashley National Forest only support about 10 percent of the sage-grouse population in the Uinta Basin."Suggested change: "Sage-grouse habitat on the Ashley National Forest support approximately 10 percent of the sage-grouse population in the Uinta Basin in Utah. Approximately 13% (184,400 acres) of the Ashley National Forest is designated as either priority or general Greater sage-grouse habitat (Table3-33)."This section misrepresents the contribution of the Ashley NF and FGNRA specifically to regional sage-grouse habitat. The entire FGNRA is either sage-grouse core area (PHMA) or GHMA, which should not be downplayed.Ch. 3, Page 148, Greater sage-grouse"Sage-grouse management areas represent the highest-priority areas for sage-grouse conservation in Utah and Wyoming (State of Utah 2019)."Suggested change: "Sage-grouse management areas represent the highest-priority areas for sage-grouse conservation in Utah (State of Utah 2019). Greater sage-grouse Core Population Areas are the highest-priority areas in Wyoming (Executive Order No. 2019-3, 2019)."Wyoming uses sage-grouse Core Population Areas and should not be included in the State of Utah citation.Ch. 3, Page 150, Amphibians and Reptiles"The western chorus frog (*Pseudacris triseriata*) is a small frog commonly found throughout much of central and northeastern Utah. It can be found in a variety of habitats, including marshes, grasslands, agricultural lands, and forests, provided that water can be found nearby (UDWR 2020e). The northern leopard frog (*Rana pipiens*) is fairly common in Utah, but some reports indicate that its numbers may be declining. This frog occurs in a variety of aquatic habitats, particularly near cattails and other aquatic vegetation; however, it may be found foraging relatively far from water. During cold winter months, it is inactive, and it takes cover underwater or in damp burrows (UDWR 2020f)."Suggested change: "The boreal chorus frog (*Pseudacris maculata*) is a small frog commonly found throughout much of central and northeastern Utah. It can be found in a variety of habitats, including marshes, grasslands, agricultural lands, and forests, provided that water can be found nearby (UDWR 2020e). The northern leopard frog (*Lithobates pipiens*) is fairly common in Utah, but some reports indicate that its numbers may be declining. This frog occurs in a variety of aquatic habitats, particularly near cattails and other aquatic vegetation; however, it may be found foraging relatively far from water. During cold winter months, it is inactive, and it takes cover underwater or in damp burrows (UDWR 2020f)."Corrected portions of common and scientific names."The Great Basin spadefoot (*Spea intermontana*) is a small toad found throughout the Great Basin, in a variety of habitats, ranging from dry sagebrush areas to spruce-fir forests. Predicted habitat occurs throughout much of Utah and much of the plan area (UDWR 2020h)."Are there any Western (Boreal) Toads in the Ashley National Forest? WGFD has records near USFS lands on the northern edge of the Uinta Mountains. We recommend updating to reflect, if appropriate."Reptile species native to the planning unit include the midget faded rattlesnake (*Crotalus oreganus concolor*), terrestrial garter snake (*Thamnophis elegans*), smooth green snake (*Opheodrys vernalis*), and rubber boa (*Charina bottae*). The terrestrial garter snake, smooth green snake, and rubber boa may be found in or near aquatic areas, such as moist meadows and along streams (UDWR 2020i, 2020j, 2020k)."Suggested change: "Snake species native to the planning unit include the midget faded rattlesnake (*Crotalus oreganus concolor*), terrestrial garter snake

(*Thamnophis elegans*), smooth green snake (*Opheodrys vernalis*), rubber boa (*Charina bottae*), and Great Basin Gophersnake (*Pituophis catenifer deserticola*). The terrestrial garter snake, smooth green snake, and rubber boa may be found in or near aquatic areas, such as moist meadows and along streams (UDWR 2020i, 2020j, 2020k). Midget Faded Rattlesnakes and Great Basin Gophersnakes are associated with rock outcrops and the sagebrush community surrounding the Flaming Gorge National Recreation Area. Lizard species native to the Ashley National Forest include the Greater Short-horned Lizard (*Phrynosoma hernandesi*), Northern Tree Lizard (*Urosaurus ornatus wrighti*), Plateau Fence Lizard (*Sceloporus tristichus*), and Northern Sagebrush Lizard (*Sceloporus graciosus*). Plateau Fence Lizards and Northern Tree Lizards are strongly associated with rock outcrops in the sagebrush and shrubland communities in the region. "We recommend splitting the reptile paragraph into snakes and lizards. Based on observations in our database, we recommend confirming whether Desert Striped Whipsnakes occur on the Ashley and updating the snake paragraph if appropriate. We also recommend confirming whether additional lizard species occur on the Utah portion of the Ashley National Forest. Ch. 3, Page 159, Effects from Designated Areas" Under all alternatives, the existing designated areas described in chapter 2 would remain. These include the Sheep Creek Canyon Geologic Area; the Ashley Gorge, Gates of Birch Creek, Lance Canyon, Pollen Lake, Sims Peak Potholes, Timber-Cow Ridge, and Uinta Shale Creek RNAs; the designated High Uintas Wilderness Area (276,175 acres); IRAs (637,700 acres); and two suitable wild and scenic river segments. "Why is the FGNRA not included as a designated area when it is defined as a designated area in Chapter 2 and the regulatory framework establishing the FGNRA is outlined later in Chapter 3? This should be better explained and/or the FGNRA should be included here as a defined designated area. If FGNRA is added, Tables 3-36 through 3-38 should be updated appropriately as should the text. "At-risk species associated with shrubland habitat, such as the pygmy rabbit and greater sage-grouse, would be impacted to a lesser extent from management for designated areas; this is because fewer acres of shrubland would be classified as a designated area (see table 3-35), and no greater sage-grouse or pygmy rabbit habitat would be classified as a designated area (table 3-37). However, ecosystem resilience may decline in designated areas over time due to the lack of habitat restoration and enhancement management (for example, a lack of mechanical vegetation management to minimize the possibility of beetle epidemics and large-scale, uncharacteristic fire). Shrubbyland habitat would also experience this impact to a lesser extent. "Suggested change: "Only 500 acres of shrubbyland is included in the proposed designated areas (table 3-36), none of which are habitat for sage-grouse or pygmy rabbits (table 3-38). As such, at-risk species associated with shrubbyland habitat would not realize the same benefits as other species from management for designated areas. "Assuming FGNRA is not added as a designated area, there is no reason to discuss hypothetical limitations of designated areas when no habitat exists for either at-risk species identified. Ch. 3, Page 259, Renewable Energy" Other forms of renewable energy, such as wind power, solar, geothermal, and biomass energy, have not seen similar interest or development on the Ashley National Forest. This is partially due to the low potential for these resources, relative to other areas in the country. It is also because of competition from abundant nonrenewable energy sources, such as crude oil, natural gas, and coal in the immediate and surrounding areas (Forest Service 2017L). "Suggested change: "Other forms of renewable energy, such as wind power, solar, geothermal, and biomass energy, have not seen similar interest or development on the Ashley National Forest. This is partially due to the low potential for these resources, relative to other areas in the country. It is also because of competition from abundant nonrenewable energy sources, such as crude oil, natural gas, and coal in the immediate and surrounding areas (Forest Service 2017L). However, interest in renewable energy development is increasing and may result an increase in future development interest on the Ashley National Forest. "Interest in renewables is increasing and should be acknowledged. Ch. 3, Page 263, Renewable Energy" Renewable energy projects would not be permitted in these areas but would still be permitted across the rest of the national forest. "If renewable energy development is possible within the FGNRA, the stipulations for development in the State of Wyoming Greater Sage-grouse Core Area Protection Executive Order 2019-3 (or current) should be acknowledged. Sage-grouse Executive Order-related restrictions should be acknowledged when discussing any new development in Wyoming in core or non-core area habitat. SHPO Comments Ch. 3, Page 230, Cultural Resources Table 3-66, Add the Lucerne Valley Petroglyph Site While in the Flaming Gorge area, this recently listed historic property is also within the bounds of the Ashley and should be included here. Appendix E, Attachment B, Page 108, Cultural and Historic Resources Timeline not included. Suggested change: This plan will

be developed within one year of implementation of the forest plan. Sets a timeframe for accomplishing this task. This should also be included as a goal. Appendix E, Ch. 2, Pages 38-39, Cultural Resources Addresses issues not identified in the plan. 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 not rise to the level of having a specific management area designated to them. The Ashley will share the list of priority heritage assets with the appropriate Native American Tribes and Federal, state, and county officials upon request. The Ashley will also readily consider suggestions to include on the list for the Forest. State Parks Comments Ch. 3, Pages 184-185, Tourism and Recreation A table showing documented visitation for past surveys and projected trends should be included so that data is easily noted. This forms the basis of recreation arguments throughout, but does not feel readily available or easy to digest. Ch. 3, Pages 184-185 and 195, Tourism and Recreation Is data available for various types of recreation? Wildlife-related user groups are mentioned on page 195, but a more complete table better defining the many uses seen in the Ashley would be useful. Some of this is presented later in Chapter 3 around page 278-279 but more charts, trends, and data would be helpful. This data forms the basis of recreation assumptions made throughout this plan and, along with public comment, influenced the development of the various alternatives. Ch. 2, Page 15, Sustainable Recreation "Management is provided based on an assumption of moderate to heavy levels of dispersed recreation projected for the Ashley National Forest." What are the numbers and expected trends to justify this assumption? 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. Ch. 2, Page 16, Social and Economic Contributions "Alternative A is focused on a commodity-based approach and emphasizes economic output associated with forest resources. The economic importance of recreation is not emphasized, and contributions from ecosystem services are not specifically addressed." This feels inconsistent with other goals of the plan. On page 10, Sustainable recreation was identified as a key focus of this plan. On page 15, recreation management is tied to an assumption of moderate to heavy levels of recreation. 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. Ch. 2, Page 19, Social and Economic Contributions "Under alternative C, as under all alternatives, social and economic contributions from the Ashley National Forest would be retained." Address how the shift towards backcountry and non-motorized recreation may shift the economics of the Forest. The economic multipliers are different across various recreation sectors. 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. Ch. 3, Page 47 and 71, Effects from Recreation There is no discussion in this document about sustainably built trails and other amenities which can mitigate or lessen the effects that trails and other recreation amenities can have on the environment. Seasonal closures and limited visitation are other potential management tools. \*This is not the only section that this comment applies to- also relevant in watershed conversations, wildlife impacts, recreation, etc. If alternatives are dismissed or graded on conditions that do not meet the best practice standards of the industry, the analysis of the four alternatives is flawed. Ch. 3, General Comment on Objectives Objectives are mentioned throughout the Chapter 3 but are rarely clearly stated and easy

to track throughout the analysis. No goals or options for meeting those objectives are given/or are rarely given. See above comment about best practice standards and sustainable recreation/development standards. Construction does result in vegetative loss but can be guided to occur in less sensitive areas, can include restoration plans, etc. Ch. 3, Page 78, Effects from Designated Areas Section is missing from this page? Ch. 3, Page 217, Areas of Tribal Importance 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. Ch. 3, Page 274, Recreation Need more information on conditions that apply to the well-developed Flaming Gorge National Recreation Area and how that area will be addressed in a separate plan. The development pressures in the FGNRA are different; their treatment will impact use in other zones of the Forest. Developing alternatives focused on one type of use, or even for one type of recreation, is a disservice to how many resources and services come from the Forest. Failing to adequately address the recreation desires of various audiences can also lead to resource degradation. Education is a major component as is providing different recreation groups opportunities across a geographical area (ie, motorized trail users should have opportunities to recreate within a certain radius of their home, but it doesn't need to be on Forest land if there are better alternatives). That requires partnerships, regardless of the Alternative selected. There needs to be more specific direction on how the FGNRA will be managed to maintain recreation opportunities and become a destination recreation area. This plan should be coordinated with the WY Outdoor Recreation Office as well as SW county planning. 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. Many Wyoming partners have expressed a desire to better coordinate use of the visitor centers and other local tourism resources to advertise recreation opportunities at FGNRA and to attract customers and users. 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. 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 whereby 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. Need a goal for what kind of visitation increases are desired. Identify where visitors are being drawn from- local backyard users, or visitors coming from further distances impacts management considerations. The Forest Service should help the state and local governments meet their economic diversity goals in relationship to developing the outdoor recreation industry. 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. Setting a goal in the plan is important as it impacts management and development pressures. FS should be a partner in supporting state plans to enhance outdoor recreation opportunities and industry. Can make use of the 1,200 miles of trails. Non-motorized single-track trails are developed to create a destination opportunity for mountain biking, horseback riding, and hiking creating a socio-economic benefit for residents and visitors alike. 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. Demand indicates the need for motorized trails in the system, but curated placement and access to supporting infrastructure and consideration of other critical Forest aspects is key to resource protection. Ch. 3, Pages 283, 302, and 305, Special Permits/Authorizations and Land Authorizations Assumption is made that there will be no increase in special recreation permits, but demand is increasing for all types of authorizations. (not quoted directly as language varies) How does the assumption that permits will not change square with the demand increasing? Needs more explanation as it will impact the level of development, public messaging, etc. Ch. 3, Page 284, Effects from Recreation Management Area Designations Recreation is spelled incorrectly on the last line of the page. Ch. 3, Page 287, Effects from Recreation Opportunities and Settings "This alternative offers the most opportunities for recreation users seeking remote locations with few management controls on the ground, no facilities, and large areas offering solitude.



Recreation users seeking developed recreation would have fewer opportunities under this alternative, compared with alternatives A and B. In addition, due to the emphasis on a primitive ROS setting, recreation users interested in both motorized and mechanized use may have fewer recreation opportunities under this alternative as compared to all other alternatives."Better define recreation trends, show visitation data and recreation area usage, and development pressures to explain the development of the four alternatives. If most of the recreation pressure is on developed areas like the Flaming Gorge National Recreation Area, addressing backcountry users may not solve problems facing the Forest. Need to prove balance of backcountry, dispersed, and developed camping and other recreation uses to justify development. Show balance in accommodating multiple uses.Ch. 3, Page 288This entire page seems to suggest that Alternative D has minimal impacts but that doesn't pencil out when looking at the acreage impacts, the recreation use impacts, and other expected outcomes.Ch. 3, Page 293, Table 3-82. Scenery Management by AlternativeThe partial retention scenery management category seems quite high for Alternative D, and brings up questions about sustainable design of recreation resources.Ch. 2, Page 20, PartnershipsIn general, we are supportive of the Forest working to build partnerships with local, county, state, and other land management partners. We would like to see this ethos expanded to connect the other alternatives as it should be a general goal, not a component of one alternative.State Parks General CommentsIn general, it would help to see more information about current conditions aligned with desired conditions.Consistent formatting with more opportunities to see side-by-side comparisons of the four alternatives would make the document easier to read and would aid in providing consistent analysis.The alternatives presented fail to strike a balance between recreation desires and resource protection, and do not provide balanced opportunities for the many types of recreation that Forest users wish to see. We want to see more proactive management.