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Comments: The state of Utah (State) has reviewed the Ashley National Forest Plan Revision Draft Environment Impact Statement (DEIS). The State appreciated participating as a Cooperating Agency in the preparation of the Forest Plan Revision and the DEIS. The State submitted scoping comments on November 8, 2019 and comments on March 10, 2021 and August 3, 2021, and reaffirms those comments and incorporates them by reference. Alternative D seems most consistent with the State's interests. The Forest Service has addressed many of the State's comments in the DEIS, but numerous concerns remain. In collaboration with the Department of Agriculture and Food (UDAF) and the Division of Water Quality (DWQ), the State offers the following general and technical comments for your consideration.

Please see attached letter for complete comment. Thank you

State of Utah Spencer J Cox GovernorDeidre M HendersonLieutenant Governor Office of the GovernorPublic Lands Policy Coordinating Office Redge B. Johnson Executive Director February 17, 2022Submitted via electronic mail: https://www.fs.usda.gov/main/ashley/landmanagement/planningSusan Eickhoff Forest SupervisorAshley National Forest 355 North Vernal Avenue Vernal, Utah 84078Subject: Ashley National Forest Plan Revision Draft EIS RDCC Project No. 81423 Dear Supervisor, Eickhoff:The state of Utah (State) has reviewed the Ashley National Forest Plan Revision Draft Environment Impact Statement (DEIS). The State appreciated participating as a Cooperating Agency in the preparation of the Forest Plan Revision and the DEIS. The State submitted scoping comments on November 8, 2019 and comments on March 10, 2021 and August 3, 2021, and reaffirms those comments and incorporates them by reference. Alternative D seems most consistent with the State[rsquo]s interests. The Forest Service has addressed many of the State[rsquo]s comments in the DEIS, but numerous concerns remain. In collaboration with the Department of Agriculture and Food (UDAF) and the Division of Water Quality (DWQ), the State offers the following general and technical comments for your consideration.General CommentsFuture management of the Ashley National Forest is very important to the State, the affected counties, and citizens who use the forest for a wide variety of recreation activities or to generate income for their families. Decades of passive forest management under the current plan has led to unhealthy forest conditions which make it ripe for disease and uncharacteristic wildfire.Cooperation, Coordination and ConsistencyUnder NEPA, all Federal Agencies must complete a NEPA analysis for proposed actions that are likely to have an impact on the natural or human environment, such as this forest plan revision. Federal Agencies can designate State and Local Governments to become formal partners in the NEPA process, as Cooperating Agencies. A State or Local Government can be a Cooperating Agency when it has special expertise with respect to any environmental impact involved in the project proposal. Cooperating Agency status gives the State or Local Government early input into NEPA analyses and some ability to shape the goals and framework of the Federal proposal. This office appreciates the opportunity to have served as a Cooperating Agency through the process of developing this environmental analysis.When creating Land Use Plans, the USFS is required to coordinate their Plans with State and Local Government plans. Coordination is a separate process from Cooperation and must occur regardless of whether State or Local Governments were designated Cooperating Agencies. Agencies must make efforts to draft Federal Plans that coordinate with State and Local Plans.The National Forest Management Act requires the USFS to coordinate with local governments but does not specify how the process of coordination is to be accomplished.Forest Service regulations require:- Responsible officials coordinate with local governments.- Responsible officials shall review local plans and policies that are relevant to the federal plan. The review will consider the objectives of local plans, the compatibility and interrelated impacts between local and federal plans, opportunities to address impacts and contribute to joint objectives, and

opportunities to resolve or reduce conflicts. This review must be included in the NEPA document.- The responsible official will not direct or control management of lands outside of the planning boundary.Consistency between federal, state, local, and tribal plans is the desired outcome for the coordination and cooperation processes required of federal agencies. The importance of coordination and cooperation between state, local, and Federal agencies during planning processes cannot be overstated. Early involvement and equal consideration in environmental reviews, as Interdisciplinary Team members, stakeholders, and Cooperating Agencies was the State[rsquo]s main objective and motivation for creation of the State Resource Management Plan (SRMP). The SRMP and subsequent implementation plans shall be followed unless inconsistent with any federal statute or duly promulgated regulation.Page 6 of the DEIS states that: [ldquo]The Forest Service collaborated with cooperating agencies throughout the planning process to consider ways the forest plan could contribute to common objectives, address impacts, resolve or reduce conflicts, and contribute to compatibility between the Forest Service and other agencies[rsquo] plans.[rdquo]The state requests that the DEIS be amended to recognize that some of the cooperating agencies have their own resource management plans (such as the State of Utah and all the Utah counties) and indicate whether the Forest Service intends for the forest plan to be consistent with these state and county resource management plans to the greatest degree possible.1FOOTNOTE: 1. www.rmp.utah.govPage 11 of the DEIS states that: [ldquo]The Forest Service also received comments on specific wildlife concerns, including management of bighorn sheep.[rdquo]The State requests that the DEIS recognize that the Forest Service does not manage bighorn sheep or any other type of fish or wildlife. Such is the responsibility of state wildlife management agencies. The DEIS should indicate the type of coordination that occurs between the Forest Service and the state wildlife management agencies and how the results of such coordination are reflected in the forest plan revision.Page 323 of the DEIS addresses [ldquo]Plan Consistency Review.[rdquo] Unfortunately, there is no mention in this section of several inconsistencies between alternatives B and C and Utah State and County Resource Management Plans identified in this letter.Several areas of inconsistency between the proposed forest plan revision and its alternatives are discussed below.Special Designations (Wilderness & Wild and Scenic Rivers)Page 5 of the DEIS states that: [ldquo]Such temporary classifications do not guarantee formal designation, but they do influence forest plan guidance of how to manage the recommended areas.[rdquo]The State[rsquo]s position is that there is no [ldquo]temporary classification[rdquo] established when a recommendation is made for a wild and scenic river or wilderness designation.2 Only Congress has the authority to [ldquo]classify[rdquo] lands or waters as wilderness or wild and scenic rivers. Instead, the term [ldquo]recommended designation[rdquo] (see footnote 1 in Table 2-1) should be used.FOOTNOTE: 2. https://rmp.utah.gov/wp-content/uploads/SRMP_Web.pdfPage 12 of the DEIS states that: [ldquo]All alternatives will provide management direction in keeping with language in legislative direction for the designated High Uinta Wilderness Area (276,175 acres on the Ashley National Forest). Inventoried roadless areas (approximately 637,700 acres on the Ashley National Forest) will be managed in accordance with relevant regulations.[rdquo]This acreage data for the HUWA appears incorrect. There are over 289,000 acres of High Uinta Wilderness acres in Duchesne County alone. Pages 69 and 70 indicate that there are 274,000 acres of HUWA in the Ashley National Forest and page 158 indicates 276,175 acres. The Uinta-Wasatch-Cache National Forest states that this wilderness area accounts for 456,705 acres.3 Please specify the correct acreage in future documents.FOOTNOTE: 3. https://www.fs.usda.gov/detail/uwcnf/about-forest/districts/?cid=fsem_035477Page 17 of the DEIS states that: [ldquo]Alternative B would add additional designated areas to protect special resources. This alternative would include management of two recommended wilderness areas (see appendix A, figure 2-21).[rdquo]Establishing additional wilderness areas on the forest is inconsistent with the Daggett County Resource Management Plan 4, Duchesne County Resource Management Plan (CRMP)5, Uintah County Resource Management Plan6, and the State of Utah Resource Management Plan (SRMP).7 For example, a significant portion of Duchesne County[rsquo]s land area (13.82%) is already under wilderness designation. These lands, additional wilderness acreage in adjoining counties and inventoried roadless areas on the Ashley National Forest, provide ample opportunities for persons seeking solitude.FOOTNOTE: 4. https://rmp.utah.gov/wp-content/uploads/Daggett-Chap-RMP-FINAL-w-appendix.pdfFOOTNOTE: 5. https://rmp.utah.gov/duchesne-county/FOOTNOTE: 6. https://rmp.utah.gov/wp-content/uploads/Uintah_CRMP_2019_.pdfFOOTNOTE: 7. https://rmp.utah.gov/wp-content/uploads/SRMP_Web.pdfFor example, the Duchesne CRMP 8, in Section 23, contains the following

policies associated with Wilderness:FOOTNOTE: 8. https://rmp.utah.gov/wp-content/uploads/Duchesne-General-Plan-2019-update.pdfFor example, the Duchesne CRMP8, in Section 23, contains the following policies associated with Wilderness:1. The county[rsquo]s support for any recommendations made under a statutory requirement to examine the wilderness option during the revision of land and resource management plans or other methods will be withheld until the following are clearly demonstrated that:a. The adopted transportation plans of the state and county or counties within the federal land management agency[rsquo]s planning area (National Forest or BLM land) are fully and completely incorporated into the baseline inventory or information from which plan provisions are derived.b. Valid state or local roads and rights-of-way are recognized and not impaired in any way by the recommendations.c. The possibility of future development of mineral resources by underground mining or oil and gas extraction by directional or horizontal drilling or other non-surface disturbing methods are not affected by the recommendations.d. The need for additional administrative or public roads necessary for the full utility of the various multiple uses, including recreation, mineral exploration and development, forest health activities, operation and maintenance of water facilities, and grazing operations on adjacent land, or on subject lands for grand- fathered uses, are not unduly affected by the recommendations.e. Analysis and full disclosure are made concerning the balance of multiple-use management in the proposed areas.f. The analysis compares the full benefit of multiple-use management to the recreational, forest health, and economic needs of the state and the county to the benefits of the requirements of wilderness management.g. The conclusion of all studies related to the requirement to examine the wilderness option are submitted to the county for review and action, and the results in support of or in opposition to, are included in any planning documents or other proposals that are forwarded to the United States U.S. Congress.h. Areas must merit the suitability requirements contained in the Wilderness Act of 1964 unless requirements are changed by U.S. Congress.3. Any proposed wilderness designations in the county forwarded to U.S. Congress for consideration must be based on a collaborative process in which support for the wilderness designation is unanimous among federal, state, and county officials.8. In accordance with Utah Code 63J-8-104 (b) and (c), it is the policy of the county that federal land management agencies shall:a. Not designate, establish, manage, or treat any of the subject lands as an area with management prescriptions that parallel, duplicate, or resemble the management prescriptions established for wilderness areas or WSAs, including the non- impairment standard applicable to WSAs or anything that parallels, duplicates, or resembles that non-impairment standard.b. Recognize, follow, and apply the wilderness settlement agreement between the State of Utah and the U.S. Department of the Interior.c. Revoke and revise BLM Manuals H 6310, 6320, and 6330.d. Recognize that BLM lacks congressional authority to manage subject lands, other than WSAs, as if they are or may become wilderness.e. Recognize that even if BLM were to properly inventory an area for the presence of wilderness characteristics, BLM still lacks authority to make or alter project level decisions to automatically avoid impairment of any wilderness characteristics without express congressional authority to do so.Furthermore, additional objectives and policies for Uintah County can be found on pages 63 and 64 of Uintah CRMP and for Daggett County on pages 68 through 70 of the Daggett CRMP.Furthermore, the State opposes the recommendation of new Wilderness Study Areas after June 1992.- The State of Utah will actively participate in all public land management planning activities.- The State of Utah opposes any legislation introduced in Congress to designate additional Wilderness Areas except for legislation introduced by a member of Utah[rsquo]s congressional delegation.- The State of Utah opposes any legislation introduced in Congress to designate additional Wilderness Areas unless such legislation is supported by the respective county commission or county council in the county impacted by the proposed legislation.- The State of Utah will actively participate with federal partners in making wilderness management plans.- The State of Utah opposes the management of non-wilderness federal lands as de facto wilderness, including [ldquo]wildlands,[rdquo] [ldquo]lands with wilderness characteristics,[rdquo] [ldquo]wilderness inventory areas,[rdquo] and other such administrative designations.- The State of Utah opposes the review of additional U.S. Forest Service lands for wilderness, except for the reviews expressly provided for in the Utah Wilderness Act of 1984, [sect]201(b).1. (a) secure for the people of Utah, present and future generations, as well as for visitors to Utah, the benefits of an enduring resource of wilderness on designated state-owned lands.Considering these state and county policies, the wilderness recommendations of alternatives B and C must not be selected. The only alternatives that would be consistent with state and county polices associated with wilderness are A and D.Effects of Wilderness Management on Forest HealthPage 71 of

the DEIS states that: [ldquo]Wilderness management protects riparian and wetland ecosystems through minimizing ground disturbance, eliminating motorized access, and reducing recreation use, all of which reduce impacts on riparian and wetland vegetation and inhibit the spread of nonnative species.[rdquo]This may be true in the short term, but the [ldquo]hands-off[rdquo] approach to wilderness management increases the long-term risk of uncharacteristic wildfire, which can destroy riparian and wetland ecosystems, impact air quality, water quality, and cause other downstream impacts.This may be true in the short term, but the [ldquo]hands-off[rdquo] approach to wilderness management increases the long-term risk of uncharacteristic wildfire, which can destroy riparian and wetland ecosystems, impact air quality, water quality, and cause other downstream impacts.Page 71 of the DEIS also states that: [ldquo]Hydrologic processes can be adversely affected by management activities, such as fire suppression, prescribed fire, timber extraction, fuels reduction, noxious weed treatments, road construction, recreation, and livestock grazing.[rdquo]It should be recognized here that hydrologic processes can also be adversely affected by the lack of management activities in special designation areas such as wilderness. The inability to conduct restoration projects in wilderness area will hamper efforts to restore watersheds inside wilderness to properly functioning condition.Page 73 of the DEIS states that: [ldquo]In turn, 1,670 acres of riparian vegetation communities, 1,000 acres of wetland vegetation, and 960 acres of possible or likely ferns would receive increased protection through designation of these river corridors (table 3-9).[rdquo]The 42 miles of the Uinta River tributaries suitable for Wild and Scenic Rivers (WSR) designation are within the High Uintas Wilderness Area; so WSR designation really does not provide increased protection; the protection against management activities, such as timber harvest, is already in place. Multiple layers of special designations within wilderness are not necessary.Page 117 of the DEIS states that: [ldquo]Terrestrial vegetation would be subject to wilderness management direction, as described in [ldquo]Environmental Consequences for Terrestrial Vegetation Common to All Alternatives, in these areas.[rdquo]Here would be a good place to recognize that wilderness management direction relies on natural processes, which removes many tools otherwise available to benefit terrestrial vegetation communities.Page 119 of the DEIS states that: [ldquo]Terrestrial vegetation types, primarily alpine and conifer forest, would be subject to wilderness management direction, as described previously.[rdquo]Again, the State requests that the document be amended here to recognize that wilderness management direction removes many tools otherwise available to benefit terrestrial vegetation communities and wildlife.Page 119 of the DEIS states that: [ldquo]Alternative D also allows for minimum impact suppression tactics only in wilderness. Emphasis is to manage fire for protecting developed resources and would have limited focus to maintain or improve terrestrial vegetation types.[rdquo]It is important to have flexibility in the forest plan revision to suppress naturally occurring fires in wilderness before they spread out of wilderness areas and do tremendous damage to ecosystems. The state recommends adding this flexibility to Alternative B.Effects of Wilderness Management on RecreationPage 15 of the DEIS states that: [ldquo]Mechanized travel (i.e., mountain bikes) is permitted on existing roads and trails.[rdquo]E-bikes continue to grow in popularity as they offer an alternative mode of transportation for those physically unable to pedal a mountain bike over steeper terrain. The DEIS should indicate whether [ldquo]e-bikes[rdquo] are considered motorized travel or mechanized travel and if they would be permitted in special designation areas on the Ashley National Forest.Page 185 of the DEIS (Table 3-52) indicates that the visitor satisfaction levels in designated wilderness areas, (associated with developed facilities and services) rates at 96.6% satisfaction. This data seems suspect when there are no developed facilities or services allowed in wilderness areas.Page 205 of the DEIS states that: [ldquo]Access for recreation would also be maintained for all communities. However, the level of access and the recreational experience may be affected by variation in management areas that restrict future motorized access (i.e., recommended wilderness).[rdquo]The State requests that the DEIS be amended here to recognize that wilderness areas restrict access to citizens with mobility disabilities and the elderly; many of which also have low incomes and should be part of the environmental justice considerations.Page 206 of the DEIS states that: [ldquo]As discussed in the recreation section, users looking for solitude may have limited opportunities in the Ashley National Forest due to high demand and limited ROS classes with these opportunities.[rdquo] Page 207 states that: [ldquo]However, communities valuing solitude and naturalness for cultural uses may have limited options in the long term.[rdquo]This statement is highly subjective and the State questions these conclusions that there may be limited opportunities/options for solitude considering there are at least 276,175 acres High Uintas Wilderness on the Ashley National Forest (with even more acreage on the Uinta-Wasatch-Cache National Forest) and some

637,700 acres of Inventoried Roadless Areas on the Ashley National Forest that provide ample land area for solitude seekers.Effects of Wilderness Management on the Timber IndustryPage 211 of the DEIS states that: [ldquo]In addition, alternative C has the lowest level of forest product removal of the action alternatives. This is because of an emphasis on natural processes for vegetation management and an increase in the acres managed as recommended wilderness areas and backcountry recreation areas where timber harvest would be restricted. This alternative would result in the lowest availability and removal of forest products and the associated economic effects related to the timber industry. Economic effects of forest product removal under alternative C would support 35 jobs and $1.8 million in labor income in the local economy, annually.[rdquo]Page 244 of the DEIS states that: [ldquo]Alternative B would introduce two additional areas for recommendation as wilderness, totaling approximately 10,300 acres. These newly recommended wilderness areas would prohibit timber production to maintain the option for future designation as wilderness, thus reducing the acres suitable for production when compared with alternative A.[rdquo]Page 245 of the DEIS states that: [ldquo]Alternative C would include the most acres managed to maintain wilderness characteristics; no acres would be found suitable for timber harvest within these areas to preserve the suitability of these areas for wilderness designation. Alternative C would also introduce additional miles of suitable [streams] for inclusion in the NWSRS. This would reduce the available acres for timber harvest.[rdquo]The reduction of lands suitable for timber production in favor of additional wilderness acreage under alternatives B and C would be inconsistent with adopted state and local resource management plan policies as follows:The Daggett CRMP states the following on pages 30-31 regarding forest management and timber:- All forested lands must be managed for sustained yield, multiple use and forest health.- Fire, timber harvesting, and treatment programs must be managed to prevent waste of forest products.- Management programs must provide for fuel load management and fire control to prevent catastrophic events and reduce fire potential at the urban and industrial interface.- Management and harvest programs must be designed to provide opportunities for local citizens and small businesses.- It is the County[rsquo]s policy to protect timber resources and promote the continuation of a sustainable wood products industry.- Sale sizes should provide opportunities for a wide spectrum of producers and allows for local entrepreneurship.- Commercial firewood harvesting is needed and could be a help in fuel load management and fire control. Encourage USFS to open appropriate areas for commercial timber harvest.- Participate in the planning for and revision of USFS forest management plans and Bureau of Land Management resource management plans affecting forest management. When revising or updating a forest plan, USFS should engage with the county in developing alternative management strategies and management policies.- Encourage USFS to find commercial uses for timber and forest products affected by wildfire or pests.- Collect and provide data to USFS regarding appropriate forest management methodologies. Data may include published scientific literature, local case studies, inventories, or other pertinent information.- USFS forest plans should address commercial tree species selection, stocking levels, age class distribution, integrated pest management, and fuel loading. Additionally, areas for timber and nontimber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.- Removal of forest products shall be viewed as achievable and sustainable provided that appropriate science and technology are used.- Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.- Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.- Grazing on national forest land should be tied to historic levels and healthy forest conditions. AUMs should be maintained; vacant allotments should be actively restocked.The Uintah CRMP states the following objectives and policies on pages 25 through 27 regarding forest management and timber:- Use active and adaptive forest management to improve forest health and support multiple use and sustained yield with emphasis on employment, forest product production, open space, wildlife habitat, forage, recreation, and other social and economic benefits.- Manage forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by society, including ecosystem and community health and resilience.- Encourage and support the expansion of the local forest product market at sustainable harvest levels.- Develop new markets for timber and forestry products that are available for harvest (e.g., use timber

products for bracing in nearby coal mines or biofuels industry).- When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.- Manage forest watersheds for optimal yield without compromising other resources.- Seek opportunities to use and harvest forest products that have been affected by wildfire or pests (e.g., beetle).- Reduce time required for National Environmental Policy Act processes associated with timber harvests so that economic benefits can be maximized.- Support best management practices that incorporate multiple use and sustained yield for all forest resources.- Participate in the planning for and revision of USFS forest management plans and Bureau of Land Management resource management plans affecting forest management.- Encourage USFS to open appropriate areas for commercial timber harvest.- Encourage USFS to find commercial uses for timber and forest products affected by wildfire or pests.- When revising or updating a forest plan, USFS should engage with the county in developing alternative management strategies and management policies.- Collect and provide data to USFS regarding appropriate forest management methodologies. Data may include published scientific literature, local case studies, inventories, or other pertinent information.- USFS forest plans should address commercial tree species selection, stocking levels, age class distribution, integrated pest management, and fuel loading. Additionally, areas for timber and non-timber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.- Removal of forest products shall be viewed as achievable and sustainable provided that appropriate science and technology are used.- Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.- Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.- Grazing access on national forest land should be tied to historic levels and healthy forest conditions.- Manage forest watersheds for optimal yield without compromising other resources.- Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, Uintah County Resource Management Plan 2017 | 27 shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.- Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.- Management programs must provide for fuel load management and fire control to prevent catastrophic events and reduce fire potential at the urban interface.- Sale sizes should provide opportunities for a wide spectrum of producers and allow for local entrepreneurship.- Uintah County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially with in the county and their suggested future management classifications.- Uintah County supports efforts by the State of Utah to petition the Department of Agriculture and Congress to establish new management provisions for Inventoried Roadless Areas across the state.- Uintah County, along with its General Plan and Resource Management Plan, shall be directly involved in the development and implementation of the Management Plan for the USFS, particularly in regards to planning for the Ashley Karst National Recreation and Geologic Area. Uintah County requires that the Secretary shares such plan with the county before it is finalized. (Amended 8/12/2019)The Duchesne CRMP contains several relevant objectives and policies as follow: Duchesne CRMP, page 31:- (6) Duchesne County supports the wise use, conservation and protection of public lands and their resources, including well-planned management prescriptions. It is the County[rsquo]s position that public lands be managed for multiple uses, sustained yields, prevention of waste of natural resources, and to protect the health, safety and welfare of the public. It is important to the County economy that public lands be properly managed for fish, wildlife, livestock production, timber harvest, recreation, energy production, mineral extraction and the preservation of natural, scenic, scientific and historical values.Duchesne CRMP, page 35:It is the policy of Duchesne County that multiple-use and sustained-yield management means that federal agencies should develop and implement management plans and make other resource-use decisions that:Are designed to produce and provide the desired vegetation for the watersheds, timber, food, fiber, livestock forage, and wildlife forage, and minerals that are necessary to meet

present needs and future economic growth and community expansion without permanent impairment of the productivity of the land;Duchesne CRMP, pages 40-41.Vegetation Management Policies for Special Designation AreasIn special designation areas, permittees, local, state, and federal entities shall cooperate, consult and coordinate in order to actively manage vegetation with a full range of management tools and techniques including, but not limited to, mechanical, chemical, agricultural, natural, or other methods as deemed necessary by the permittee or entity.Duchesne County finds the unhealthy state of the forest and timber resources in the County to be unacceptable. Duchesne County supports proper and active management of forest resources, as well as the myriad of resources that will be adversely affected by catastrophic wildfire. Such active management requires logging, motorized access, mechanical and chemical treatments, as well as monitoring, thinning, reclamation and seeding.Duchesne CRMP, page 42Watershed Policies in Special Designation AreasVegetation management projects in watershed areas shall include restoration and removal or timber to limit wildfire impacts, protect riparian areas, ensure appropriate water flows and enhance water flows.Duchesne CRMP, page 146Forest Management PoliciesManagement strategies shall protect timber resources from fire (in accordance with the National Fire Plan), insects, and disease. Such management strategies shall provide for proper vegetation management practices so that excessive fuel loading and high intensity fires do not damage soil productivity.Duchesne CRMP, page 312Inventoried Roadless Area PoliciesManaging public lands for "wilderness characteristics" circumvents the statutory wilderness process and is inconsistent with the multiple-use and sustained-yield management standard that applies to all BLM and USFS lands that are not wilderness areas or WSAs and adversely affects the counties[rsquo] economy in terms of the grazing, tourism, oil and gas extraction, mining, timber industries, and water resource development.The State of Utah Resource Management Plan contains the following: Utah SRMP, page 114:Forest Management Policies:Encourage timber harvesting to prevent fuel load and biomass buildup.Encourage prompt removal and salvage of drought, fire, and beetle killed timber and reseed or replant as appropriate to maintain healthy forests and watersheds.Utah SRMP, page 134The State of Utah supports the concept of multiple-use and sustained yields on public lands. Federal lands should be managed to produce the maximum yield of timber, forage, recreation, and minerals at sustainable levels. Agriculture is an integral part of the multiple-use concept.Utah SRMP, page 238[sect] 63J-4-401. Planning duties of the planning coordinator and office(6) The state planning coordinator shall recognize and promote the following principles when preparing any policies, plans, programs, processes, or desired outcomes relating to federal lands and natural resources on federal lands pursuant to this section:(ii) multiple-use and sustained-yield management means that federal agencies should develop and implement management plans and make other resource-use decisions that:(D) are designed to produce and provide the desired vegetation for the watersheds, timber, food, fiber, livestock forage, and wildlife forage, and minerals that are necessary to meet present needs and future economic growth and community expansion without permanent impairment of the productivity of the land.Effects of Backcountry Management areas on RecreationPage 71 of the DEIS states that: [ldquo]In general, watersheds with more than 1 mile of road per square mile can be considered to have moderate to high road density (Forest Service 2011c).[rdquo]The state disagrees with this general consideration regarding road density. If a road were 20 feet wide, a mile of road would occupy 105,600 square feet or 2.42 acres of a 640- acre square mile. This is only .00378 percent of a square mile occupied by roads, which is hardly a moderate to high road density.Page 211 of the DEIS states that[hellip] [ldquo]Recreation experience[mdash]As under alternative B, alternative C would include the establishment of recreation management areas. Under alternative C, however, recreation emphasis would focus on expanded backcountry management areas and further restrict motorized use in these areas. This alternative also has the most acres set aside as proposed wilderness, and it includes additional stream segments managed as suitable for inclusion in the NWSRS.[rdquo]This reduction of motorized recreation opportunities under alternative C in favor of additional wilderness and backcountry management areas would be inconsistent with adopted state and local resource management plan policies associated with motorized recreation as follows:Duchesne CRMP, page 244Public land agencies shall limit OHV[rsquo]s to trails, roads, or areas specifically designated by the agency for that purpose. However, the availability and mileage of such trails should be expanded to meet demand and provide OHV loops that connect communities. Open area riding as well as looped and stacked trail systems should be offered, with a variety of levels of trail difficulty.Duchesne CRMP, page 247In accordance with Utah Code 63J-8-104(g), federal land management agencies shall achieve and maintain traditional access to outdoor recreational opportunities available on federal lands as follows:Hunting,

trapping, fishing, hiking, camping, rock hounding, OHV travel, biking, geological exploring, pioneering, recreational vehicle camping, and sightseeing are activities that are important to the traditions, customs, and character of the county and should be allowed to continue.Duchesne CRMP, page 248Existing levels of motorized public access to traditional outdoor recreational designations in the county must be continued, including both snow machine and OHV use, in areas where resource damage is unlikely to occur.Utah SRMP, page 185[sect] 63J-8-104. State land use planning and management program(g) achieve and maintain traditional access to outdoor recreational opportunities available in the subject lands as follows:(i) hunting, trapping, fishing, hiking, family and group parties, family and group campouts and campfires, rock hounding, OHV travel, geological exploring, pioneering, recreational vehicle parking, or just touring in personal vehicles are activities that are important to the traditions, customs, and character of the state and individual counties where the subject lands are located and should continue.Effects of Backcountry Management areas on Timber IndustryPage 245 of the DEIS states that: [ldquo]Under alternative C, there would be an emphasis on management of recreation areas to improve the backcountry experience for recreationists, unlike under alternative A. This management would increase the acreage of backcountry management areas and would prohibit timber harvest within them. This would result in the decreased number of acres suitable for timber production and harvest.[rdquo]Reduction of lands suitable for timber harvest in favor of backcountry management areas would be inconsistent with adopted state and local resource management plan policies, (see policies previously listed under [ldquo]Effects of Wilderness Management on the Timber Industry).[rdquo]Effects of Alternatives B and C and special designations on GrazingPage 18 of the DEIS states that: [ldquo]Under alternative B, forage for livestock grazing would have specific utilization levels included in management (50 percent) as well as 4-inch stubble height guidelines to provide criteria to help meet desired conditions for terrestrial vegetation.[rdquo]Establishing one-size-fits-all utilization levels and stubble height guidelines is inconsistent with the state and county resource management plans. If exceptions or on-site modifications are allowed under Alternative B, please indicate here. A more flexible, adaptive management approach, such as proposed in Alternative D, accounting for range conditions at site-specific locations, should be used to meet desired conditions.Pages 210-211 of the DEIS state that: [ldquo]An alternative assumption (that all affected pastures would be closed and not proportionally reduced) would result in a larger reduction of HMs[mdash]a loss of 3,318 HMs[mdash]and a small, but measurable, impact on the regional economy. 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 closure of these allotments would result in an estimated loss of 7 jobs and $120,000 in labor income on an average annual basis. This would result in the lowest estimated HMs of all alternatives and the lowest level of economic effects, in terms of jobs and income related to livestock grazing.[rdquo]Pages 251-252 of the DEIS state that: [ldquo]The most likely impact from management of recommended or designated wilderness would be alterations to the timing and intensity of grazing operations to meet desired conditions to maintain wilderness character. Other potential impacts on grazing management due to recommended or designated wilderness include impacts to access of allotments for maintenance of structural range developments, the ability to haul salt and minerals, and the retrieval of sick animals due to restrictions on motorized use.[rdquo]Page 253 of the DEIS states that: [ldquo]Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches unless monitoring indicates a different level sufficient to meet and maintain desired conditions (table 3-68). In areas where these guidelines are not met and exceptions are not made, there could be modifications to the timing and intensity of grazing operations, particularly adjustments to livestock numbers or season of use, or both, and associated reductions in numbers and season of use permitted to grazing operators, when compared with alternative A.[rdquo]Page 254 of the DEIS states that: [ldquo]Under alternative C, forage for livestock would be limited to a level of 40 percent utilization and a stubble height of 4 inches (table 3-71). Exceptions will not be made for utilization levels and stubble-height guidelines.[rdquo]The one-size-fits-all utilization and stubble height standards and restricting the timing and intensity of grazing in favor of increased areas managed to maintain wilderness characteristics under Alternatives B and C (see previous four references above) is inconsistent with adopted state and local resource management plan policies listed below.The flexibility in Alternative D is preferable.Daggett CRMP, page 29:When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.Daggett CRMP, page 31:Grazing on national forest

land should be tied to historic levels and healthy forest conditions. AUMs should be maintained; vacant allotments should be actively restocked.Daggett CRMP, page 39:Daggett County opposes the reduction, relinquishment, or retirement of grazing AUMs in favor of conservation, wildlife, and other uses.Uintah CRMP, page 20:When sustainable and based on scientific knowledge and local data, increase grazing (allotments, AUMs, or seasonal use) to reduce fuel loads.Uintah CRMP, page 24:When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.Uintah CRMP, page 38:The county opposes the reduction, relinquishment, or retirement of grazing AUMs in favor of conservation, wildlife, and other uses.Land management plans, programs, and initiatives should provide the amount of domestic livestock forage, expressed in AUMs, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of AUMs sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.Duchesne CRMP, page 34BLM and Forest Service land use plans should produce planning documents consistent with state and local land use plans to the maximum extent consistent with federal law and FLPMA's purposes, by incorporating the state's land use planning and management program for the subject lands that preserve traditional multiple use and sustained yield management on the subject lands to:1. Achieve and maintain in perpetuity a high-level annual or regular periodic output of agricultural, mineral, and various other resources from the subject lands;2. Support valid existing transportation, mineral, and grazing privileges in the subject lands at the highest reasonably sustainable levels;Duchesne CRMP, pages 97-100Consistent with the state laws associated with grazing on federal lands, it is the position of Duchesne County that:Well managed livestock grazing, though poorly understood by the average citizen, is the most effective way to manage vegetation on a large scale to benefit watershed health and preserve wildlife habitat.Improving grazing management on Duchesne County[rsquo]s private and public lands should be viewed as a long-term priority.Public lands shall be managed to maintain or increase forage allocation for livestock grazing. Annual monitoring should be done to verify whether desired conditions are being maintained.Public land agencies shall maintain livestock grazing permits and grazing allocations at present levels unless a study of rangeland conditions justifies increased or decreased grazing. The county recognizes that drought, wildfire, and other factors may affect the terms of grazing permits.The County opposes the reduction, relinquishment, or retirement of grazing animal unit months in favor of conservation, wildlife, and other uses. Any decreases should be temporary in nature due to ever-changing range conditions. The county expects the Utah Division of Wildlife Resources to coordinate with land management agencies as they manage forage and grazing allotments for the benefit of livestock and wildlife populations.Land management plans, programs, and initiatives should provide that the amount of domestic livestock forage, expressed in animal unit months, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of animal unit months sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.The County favors the best management practices that are jointly sponsored by cattlemen's, sportsmen's and wildlife management groups such as chaining, logging, seeding, burning, and other direct soil and vegetation prescriptions that are demonstrated to restore forest and rangeland health, increase forage, and improve watersheds in grazing districts and allotments for the mutual benefit of domestic livestock and wildlife. When the practices described above increase a grazing allotment's forage beyond the total permitted forage use that was allocated to that allotment in the last federal land use plan or allotment management plan still in existence as of January 1, 2005, a reasonable and fair portion of the increase in forage beyond the previously allocated total permitted use should be allocated to wildlife as recommended by a joint, evenly balanced committee of livestock and wildlife representatives that is appointed and constituted by the governor for that purpose. The County favors quickly and effectively adjusting wildlife population goals and population census numbers in response to variations in the amount of available forage caused by drought or other climatic adjustments, and state agencies responsible for managing wildlife population goals and population census numbers will give due regard to both the needs of the livestock industry and the need to prevent the decline of species to a point where listing under the terms of the Endangered Species Act when making such adjustments.Access to public rangeland is a valid existing right that is vital to the permit-holders and the land management agency for planning, management, and development.Access shall be maintained open and shall be improved as management needs require.Reductions in domestic livestock animal unit months must be temporary

and scientifically based upon rangeland conditions. Reductions in AUMs should be allocated on a species basis [wildlife, wild horse, wild burros & livestock] with a percentage allocated to each species type. The only justification for decreasing domestic livestock grazing AUM[rsquo]s is for there to be a valid and documented scientific finding that the range district will no longer support the AUM[rsquo]s in question. The BLM and Forest Service are expected to comply with and honor the domestic grazing preference on grazing districts. Likewise, the permittee is also expected to abide by the terms and conditions identified in the grazing permit.Federal policies, plans, programs, initiatives, resource management plans, and forest plans may not allow the placement of grazing animal unit months in a suspended use category unless there is a rational and scientific determination that the condition of the rangeland allotment or district in question will not sustain the animal unit months sought to be placed in suspended use. Any grazing animal unit months that are placed in a suspended use category should be returned to active use when range conditions improve.Management decisions shall be based on the individual range allotment condition and not on the overall condition of surrounding lands. Increases in available forage resulting from the conservation practices of livestock permit-holders shall not be allocated or credited to other uses.Changes in season of use or forage allocation must not be made without full and meaningful consultation with permittee. The permittee must be the first point of contact.The continued viability of livestock operations and the livestock industry shall be supported on federal and state lands within Duchesne County by management of the lands and forage resources and the optimization of animal unit months for livestock in accordance with the multiple-use provisions of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et seq., the provisions of the Taylor Grazing Act of 1934, 43 U.S.C. 315 et seq., and the provisions of the Public Rangelands Improvement Act of 1978, 43 U.S.C. 1901 et seq.Utah SRMP, page 149The State of Utah supports the concept of multiple-use and sustained yields on public lands. Livestock grazing is an integral part of the multiple-use concept. Reductions of livestock numbers through frivolous lawsuits and barriers to infrastructure improvements and maintenance necessary for effective grazing management are unacceptable.Utah SRMP, page 140The state of Utah adopts a no-net-loss stance concerning grazing AUMs on federal lands.Page 255 of the DEIS states that: [ldquo]Alternative C would have the highest percentage of the Ashley National Forest managed as designated areas; however, none of the acreage of the proposed designated areas overlapping current grazing allotments would preclude grazing. Some impacts may occur, however, related to the ability to access and maintain allotments in proposed wilderness areas, as described under [ldquo]Environmental Consequences for Livestock Grazing Common to All Alternatives.[rdquo][rdquo]Although grazing would not be precluded in new designated areas under Alternative C, the restrictions on the ability to access and maintain allotments in proposed wilderness areas would be inconsistent with state and county resource management plan policies listed above.Effects of Alternatives B and C Scenery Requirements on Utilities and InfrastructurePage 273 of the DEIS states that: [ldquo]The prohibition of new communication sites, roads, utility corridors, and other infrastructure in recommended wilderness areas would be the same as described under alternative B; however, recommended wilderness would occur over a greater area of the national forest. This would constitute 50,200 acres under alternative C, compared with 10,300 under alternative B. Any maintenance to dams, bridges, and administrative and drinking water facilities would require methods designed to ensure preservation of wilderness values. This would result in increased maintenance costs associated with compliance.[rdquo]Another reason that alternative C is not acceptable to state and local governments is the increased costs of maintaining water infrastructure in wilderness areas or wilderness study areas. For example, recent stabilization of a high mountain lake in the High Uintas Wilderness cost some $600,000 more than it normally would have due to the requirement to airlift equipment to the job site by helicopter.Page 296 of the DEIS states that: [ldquo]Under alternative C, SIO acres would be assigned to the forest, as shown in table 3-84 (see figure 2-10). Alternative C would increase the number of acres in areas where the management emphasis would maintain or enhance the valued scenic character. This is because 74 percent of the lands would have high or very high SIOs, compared with 51 percent under alternative A.[rdquo]This high percentage of high or very high SIO[rsquo]s under alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with state and county resource management plans policies set forth in this letter, including the provision of utilities and infrastructure, such as communication towers and transmission lines needed to serve a growing population and a growing renewable energy power grid.Page 297 of the DEIS states that: [ldquo]Every 5 years, the Forest Service would consider and prioritize

easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternative A.[rdquo]If the need for an easement arose, a proponent should not have to wait for the beginning of the next 5-year review period before such easement could be considered. The annual review in alternative D is preferable for flexibility in responding to easement requests.Page 299 of the DEIS states that: [ldquo]Therefore, when combined with the impacts described above from reasonably foreseeable future actions, alternative C would have the fewest cumulative impacts on the scenic character.[rdquo]While alternative C would preserve scenic character to the greatest degree, this high percentage of high or very high SIO[rsquo]s under alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with state and local resource management plan policies contained in this letter.Page 304 of the DEIS states that: [ldquo]Recent increased activity in large transmission projects, such as the Zephyr, Energy Gateway South, and Transwest Express projects, demonstrates that along with increased interest in communication uses and technologies, the demand for enhanced energy infrastructure and electrical connectivity is on the rise and is expected to increase.[rdquo]The high percentage of high or very high SIO[rsquo]s under alternative C would likely impact the ability of the Ashley National Forest to accommodate these increasing demands for energy transmission infrastructure to the detriment of clean energy development and reliability of the power supply in the western grid.Utah Department of Agriculture and FoodStubble Height and Utilization Rate StudiesThe Forest Service and BLM commissioned at the University of Idaho Stubble Height Review Team in 2003 to review the use of these standards. Subsequently, direction was given to both BLM and Forest Service in 2005 to modify wording in Annual Operating Plans (Bureau of Land Management 2005, K. Lynn Bennett to Idaho District Managers; USDA Forest Service 2005a, Jack Troyer to Region 4 Forest Supervisors; USDA Forest Service 2005b, Harv Forsgren to Region 3 Forest Supervisors).[ldquo]Agencies should modify the wording in permits and Land Use Plans to use stubble height criteria, not as a compliance standard, but as:1) a [ldquo]trigger[rdquo] to assess when livestock should be moved from a grazing unit; 2) an annual [ldquo]prompt[rdquo] to investigate and assess the riparian resource condition.[rdquo] (Cleary et al. 2008).The following documents review the science these recommendations are based upon:WCC 1998, Utilization Standards Report (Oregon State Univ. Exp. Sta. Bull 682, 1998)A symposium was held during the 1997 SRM annual meeting inviting Range researchers and Agency Administrators to evaluate Utilization Standards. The two sponsoring Western Coordinating Committees (WCC 40 Rangeland Ecological Research and Assessment, WCC 5 Rangeland Resource Economics and Policy) were concerned that utilization estimates often are used incorrectly in making rangeland management decisions.-https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7Sanders (1998) and Sharp et al. (1994) thoroughly reviewed the history and use of Utilization standards. Sanders concluded utilization standards should not be used as goals or objectives in allotment management plans. Emphasis should be placed on monitoring long- term trend on both uplands and riparian areas. Utilization and stubble height information could be used as management tools to determine when to move out of a pasture.-https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 3)Smith (1998) reviewed the seasonal effects of defoliation. He concluded Utilization Standards of individual species has little or no relevance to the subsequent growth or reproduction of the plant unless the phenological stage of growth when use occurs is specified. Timing of use has more impact than the amount of use.-https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 9)Rasmussen (1998) presented data that showed no significant correlation between yearly utilization and long-term trend. He reported research from Cook (1966) and Olsen and Richards (1989) that showed phenological stage of plant growth when grazed is more important than degree of use in determining subsequent growth and vigor of a plant. Early- season (vegetative stage) and late-season (seed ripe) heavy use had little long-term impact on plant production. Rasmussen concluded that utilization is not very useful in determining the relationship between management and long-term trend of rangelands.-https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 25)Laycock (1998) reviewed studies on the accuracy of utilization methods. He reported both the ocular estimate by plot and the caged/open clipped plot methods overestimate utilization by 30% or more. Differences among individuals, even trained observers, are very high. Utilization between years varies in proportion to the annual production,

which is determined by precipitation, and thus cannot be relied on to establish a trend or pattern. He concluded the accuracy and precision of utilization estimates are not very high, and at best should be used as an index of use, not an exact figure.- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb682.pdf#page=7 (page 17)Krueger (1998) summarized the main points of the symposium. He listed the concerns of the scientists about agency administrators applying utilization methodologies in inappropriate ways, either in the context of using them as management objectives, or by misapplication of the methods. The prominent area of agreement was that utilization is a land management tool (to be used in determining when to move to a new pasture), not a land management objective. The most accepted use of utilization techniques is to develop large-scale utilization maps to highlight areas of livestock concentration and low use.Management strategies could then be used to improve livestock distribution to even out utilization. If numbers are collected as part of the monitoring program, they always should be statistically analyzed so the decision maker knows the quality of the information.- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 71)Stubble Height Review Team (Rangelands, Feb 2006, p.23-28; Rangelands Aug 2008, p.37-39; Univ. ID Exp. Sta. Contribution No. 986) A Review Team was commissioned in 2003 by BLM Idaho State Director K. Lynn Bennet and Intermountain Region 4 Forester Jack G. Troyer to evaluate the use stubble height standards for Allotment Management Plans (Stubble Height Review Team, 2006). Each administrator sent out memos adopting and implementing the review team recommendations (Bureau of Land Management, 2005), (USDA Forest Service, 2005a). Southwest Region 3 Forester Harv Forsgren also issued an instruction memorandum to implement these findings (USDA Forest Service, 2005b).- https://journals.uair.arizona.edu/index.php/rangelands/article/download/121 33/11411The Review Team found, [ldquo]Unfortunately, the linkages between stubble height and riparian functions have had limited experimental examination[hellip]Stubble height as an annual indicator of grazing use in riparian areas should only be used in combination with longer- term monitoring of vegetation and channel parameters.[rdquo][ldquo]Although stubble height is easy to use, it is not a resource objective and therefore inappropriate as a prescriptive standard in grazing permits and land use plans. It should be used as a guideline or indicator for changing annual management in Annual Operating Instructions/Plan[hellip] It could be used as a trigger for when livestock should be moved from the grazing unit.[rdquo][ldquo]To properly manage the grazing operation, the current condition and trend of the long-term riparian management objectives would be compared with the desired condition of those objectives to assess the need to adjust grazing use.[rdquo][ldquo]Agencies should modify the wording in permits and Land Use Plans to use stubble height criteria, not as a compliance standard, but as 1) a [ldquo]trigger[rdquo] to assess when livestock should be moved from a grazing unit; and 2) and annual [ldquo]prompt[rdquo] to investigate and assess the riparian resource condition.[rdquo]Burkhardt 1997 Riparian Grazing StrategyAgency administrators have based grazing management decision solely on achieving predetermined use levels at [ldquo]key sites[rdquo]. This approach may provide simple and efficient [ldquo]grazing administration[rdquo], but it does not result in effective [ldquo]grazing management [ldquo]Utilization standards are not an appropriate substitute for [ldquo]on the ground management[rdquo] combined with objective monitoring of resource trends. The degree of defoliation is not singularly and linearly related to plant health. Proper season of use and rest are far more effective for dealing with most riparian grazing problems than are use limits.Proposed Grazing Strategies in Riparian AreasLarge Meadow Systems: Early season grazing and hot season rest or summer use rotation. Large meadow complexes should be used and managed independent from the surrounding uplands.Narrow Wooded Stream Bottoms within mountain canyons:These are concentration areas and enforcement of conservative use limits cannot effectively be accomplished. Apply cool season or early grazing and hot season rest or rotation. Develop upland water sources and herding to remove animals from bottoms.Upland Springs:Fence and pipe a portion of the water to upland water troughs.- https://journals.uair.arizona.edu/index.php/rangelands/article/view/11328/1 0601Division of Water QualityDWQ also oversees the classification, protection, and remediation of the waters of the state (Clean Water Act (CWA) [sect]304 and Utah Code [sect]19-5-110). DWQ[rsquo]s responsibilities include development of water quality standards, water quality monitoring and assessment, development of total maximum daily load plans (TMDLs) to restore impaired waters to their designated beneficial uses, issuance of Utah Pollution Discharge Elimination System (UPDES) discharge permits, issuance of CWA [sect]401 water quality certifications for federal licenses or permits (including U.S. Army Corps of Engineer[rsquo]s CWA [sect]404 Permits), and the

implementation of nonpoint source projects to improve water quality.WatershedsThe Ashley National Forest is an important source of high-quality water for local and regional ecosystems, recreational activities, fisheries, irrigation, and drinking water. Sound management of the watershed through the Revised Forest Plan will ensure that these resources continue to provide multiple benefits to the region and the state. The management direction proposed in the DEIS to [ldquo](incorporate) forest-wide desired conditions, standards, and guidelines that together provide more detail and clarity regarding the conditions and management of watersheds that would contribute to the overall goal of maintaining the integrity and resilience of watersheds and riparian, wetland, and fen vegetation communities on the national forest[rdquo] supports water quality and watershed health (pg. 74).DWQ supports the desired watershed conditions identified in the Ashley National Forest Land Management Plan (Appendix E, Chapter 2, pg. 13-14). Healthy, resilient watersheds provide clean water for downstream communities, help waterways meet their designated beneficial uses (see UAC R317-2-6), protect water quality and public health, and provide ongoing benefits from multiple use of forest resources.The DEIS identifies nonpoint source (NPS) pollution as a primary source of water pollution on the National Forest (pg. 55). The DWQ agrees that NPS pollution poses a threat to water quality and supports the use of management guidance and best management practices (BMPs) to reduce NPS pollution in the forest.According to the Watershed Condition Framework (WCF) referenced in the DEIS, fifty-three percent (53%) of the watersheds in the forest are functioning properly, while forty- seven percent (47%) are functioning at-risk. The DEIS notes that [ldquo]the distribution of overall scores indicate that seventy percent (70%) of watersheds scored near the break between properly functioning and functioning at-risk watershed condition. Changing one or more attributes could shift the classification one way or another, indicating opportunities to improve watershed condition but also degrade watersheds through mismanagement[rdquo] (emphasis added) (pg. 52). It is important that Forest Plan guidance and management ensures watersheds are functioning properly and their conditions are improving rather than degrading.The DEIS notes that [ldquo](f)or the Ashley National Forest, watershed vulnerability to climate change is considered moderate to high[hellip]Watersheds functioning at risk are more vulnerable to climate change effects. This is due to the impaired function of terrestrial physical processes, including high road densities and poor road and trail conditions[rdquo] (pg. 59). The Forest Service should prioritize maintenance or relocation of roads and trails to prepare for an influx in travel and ensure the continued health of forest watersheds.The three priority watersheds identified in the plan (Cart Creek, Wolf Creek, and Whiterocks River) align well with DWQ[rsquo]s objectives to restore impaired waters and protect existing water quality resources. Cart Creek and the West Fork Duchesne River are waterbodies within the forest that are on the 303(d) impaired list, and Ashley Karst National Recreation and Geologic Area and Flaming Gorge Reservoir are important water resources. DWQ looks forward to working with the Forest Service on restoration work in these priority watersheds.Aquatic EcosystemsDWQ agrees with the DEIS that [ldquo](t)he diverse ecosystems of the Ashley National Forest are a key component to supporting and maintaining its social and economic values. Functioning and resilient terrestrial and aquatic ecosystems contribute to healthy forests and rangelands, abundant fish and wildlife, healthy watersheds and abundant water supplies, beautiful landscapes, and a variety of other ecosystem services[rdquo] (Appendix E, pg. 7).Aquatic life is an important beneficial use for rivers and streams in the Ashley National Forest. These waters provide spawning and rearing habitat for rainbow, brown, and brook trout and the macroinvertebrates that support them. Fish passage connectivity ensures adequate habitat through fish life cycles. Management goals and objectives in Alternative B and the Draft Revised Management Plan (Appendix E) for adaptive and proactive management of riparian areas; habitat connectivity from headwaters to downstream areas; management and treatments that reduce nonpoint source pollution to waterways from sediment and animal waste; conifer removal to prevent encroachment on wet meadows in upland areas; stream channel restoration to restore aquatic habitat, reduce elevated stream temperatures, and increase bank stability; and the use of beavers to reestablish healthy river ecosystems will support healthy aquatic life and the proper functioning of aquatic ecosystems.SoilsHealthy soils are integral to healthy rivers and streams. Forest management that prevents soil erosion protects stream channels, riparian areas, and the habitat required to support aquatic life beneficial uses.Fire and fuels treatments can help reduce the risk of soil erosion from wildfires, enhance water yields from watershed, and treatment strategies that protect soils also protect water quality. For example, the proposed guidelines to leave coarse, woody debris over portions of the plan area will support soil stability and reduce the erosion potential after treatment. Other guidelines for vegetation and timber management that limit

soil disturbance to no more than fifteen percent (15%) of the area from cumulative activities and encourage mitigation measures if the disturbance exceeds this limit will help reduce soil erosion into waterways. Management decisions to avoid activities that increase soil compaction on steep slopes and sensitive areas (such as riparian areas, wetlands, and seeps, and erodible soils) protect water quality by reducing sedimentation in rivers and streams.FireAccording to the WCF, ninety percent (90%) of watersheds in the Ashley National Forest had fair scores for the fire regime, indicating an increased potential for high-intensity wildfires that may affect the overall watershed condition. The proposed risk management approach in the DEIS promotes resilient landscapes that protect water yields, water quality and water resources. Collaborative planning through programs like Shared Stewardship can create fire-adapted ecosystems across public and private lands in, and adjacent to, the forest. DWQ supports the use of fire and fuel treatments in a manner that reduces the risk of uncontrolled wildfire while protecting water yields, water quality and watershed health and resilience.Recreation and RoadsThe focus in Alternative B on recreation management will offer users a variety of developed and dispersed recreation opportunities in the forest. However, the DEIS acknowledges that the proposed increase in recreation management increases the potential for soil compaction, displacement of sensitive soils, and erosion, all of which could harm the proper functioning of wetlands and the water quality of rivers and streams in the plan area. Recognizing the potential negative impacts of increased travel on motorized routes, the Forest Service should take steps to protect those watersheds that rate either fair or poor on the roads and trails indicator for the WCF score. (85%). DWQ recommends the Forest Service consider the potential for increased sediment, higher stream temperatures, and decreased vegetative cover while choosing an alternative that can also accommodate increased travel and recreation.The Forest Service should give special consideration to those watersheds that may be at risk if there is a dramatic increase in road density following the expansion of the forest trail systems. According to the plan components in Alternative B, the Forest Service would avoid wetlands and unstable areas, consider impacts on streams when reconstructing or constructing new roads, reduce impacts on watershed condition from any new roads or trails, and not appreciably reduce WCF scores for the roads and trails condition indicator. DWQ anticipates that the Revised Forest Plan will include details about or references to maintaining water quality and wetlands from the potential impacts of new and existing roads and trails.GrazingAs was noted in the DEIS, livestock and ungulate grazing can impact riparian and wetland ecosystems and can adversely and directly affect water quality (pg. 69-70).Streambank erosion from livestock and ungulate grazing can contribute to sedimentation, turbidity, and stream channelization. Loss of riparian vegetation can increase stream temperatures to levels that stress aquatic life. Nutrient loading to streams from livestock and ungulate waste and organic matter can increase algal growth and ammonia concentrations and decrease dissolved oxygen levels. These nonpoint source pollutants can impact aquatic species and their habitat and impair streams for their designated beneficial uses. Successful partnerships between the State and U.S. Forest Service such as the Grazing Improvement Program led by the Utah Department of Agriculture and Food can help protect water quality by developing new water sources for use by livestock and ungulates and reduce impacts on streams and riparian areas. The U.S. Forest Service should continue to work with the State on implementation of such programs to improve water quality while also supporting continued livestock production and big game hunting on the Ashley National Forest.The proposed establishment of riparian management zones (RMZs) would help mitigate impacts to riparian areas from livestock and ungulate use. The flexibility in the proposed plan to allow adjustments for site-specific conditions could be used to manage livestock and ungulate use of riparian areas experiencing water quality issues. The Forest Service could identify potential conflicts through a grazing-RMZ crosswalk between grazing allotments and riparian area usage. The crosswalk could serve as a management tool/early warning system to protect riparian areas and water quality through adjustments to grazing levels/timing/duration in RMZs.DWQ recognizes that well-managed grazing is an important tool to manage vegetation that, if left un-managed, will increase fuel loads that result in uncharacteristic wildfire that will have negative impacts on water quality.Timber HarvestingTimber harvesting is an important multiple use of the forest, and a certain number of trees and other vegetation must be removed in watersheds to reduce fuel loads and enhance the supply of water produced by watersheds. However, timber harvesting, and vegetation treatments can also compromise hydrologic function and increase erosion if conducted in steeply sloping areas. When identifying areas as suitable or not suitable for timber production, the Forest Plan should take into consideration the impact of timber harvesting/thinning on watershed health and water quality. Harvesters should take soil

stability and degree of slope into consideration when operating to maintain soils and water quality and prioritize the use of existing roads whenever possible.Operations should utilize existing roads wherever possible, minimize construction of new roads, and site and design new roads in a manner that reduces erosion and impacts to water quality. The proposed plan notes that areas deemed suitable for timber production could impact springs and seeps, and soils would be vulnerable to soil compaction, displacement, and erosion from equipment. A crosswalk between areas identified as suitable for timber harvest and the guidelines to protect waterbodies, soils, and watersheds (Appendix E, Ashley National Forest Plan, Chapter 2, pg. 45) would help ensure that adverse impacts to water quality are kept to a minimum, while providing for timber harvest necessary to maintain sufficient water yields.Relevant Water Quality Rules and ReportsRecent DWQ actions relevant to Forest Plan implementation are provided here for reference:1.Headwaters Numeric Nutrient Criteria Rule (R317-2-14)The Headwaters Numeric Nutrient Criteria Rule (2020) is applicable to all Category 1 and Category 2 streams in the Ashley National Forest for Recreation (Classes 2A and 2B) and Aquatic Life (Classes 3A, 3B, 3C, and 3D (1))2.2018/2020 Combined Integrated ReportThe 2018/2020 Integrated Report (IR) was approved by EPA in 2021. This IR contains the latest 303(d) list and TMDLs within the National Forest. The Draft 2022 Integrated Report will be sent to EPA for approval in January 2022.DWQ values its good working relationship with Forest Service managers and staff and looks forward to continued coordination and collaboration during finalization of the DEIS and implementation of projects and activities under the final plan. Please feel free to contact Jodi Gardberg, Manager, Watershed Protection Section, at jgardberg@utah.gov with any questions.ConclusionThe State appreciates the opportunity to provide comments and looks forward to continually working with the Forest Service to ensure the development of the Ashley National Forest land use plan revision has integrity and fulfills the multiple-use and sustained-yield mandate of public lands. Please direct any written correspondence to the Public Lands Policy Coordinating Office at the address below or call to discuss any questions or concerns.Sincerely,Redge B. Johnson Executive DirectorTechnical Comments The remainder of our comments focus on sections of the DEIS where corrections are needed, or additional statements should be added to the analysis or conclusions. Text shown in [BOLD FOLLOWING]bold[END BOLD],[BOLD AND UNDERLINE FOLLOWING]underlined type[END BOLD AND UNDERLINE] indicates text that should be added to the DEIS. Text in [BOLD FOLLOWING]bold type[END BOLD] indicates state suggestions for improvement of the DEIS or reasons for the edits suggested. Text that is overstruck should be removed from the DEIS. The state believes that these edits will better inform the decision maker of the implications of the various alternatives and lead to a better result. These comments are as follows and are listed by DEIS page number:PageS-1 The Forest Service has prepared this draft environmental impact statement ([BOLD AND UNDERLINE FOLLOWING]D[END BOLD AND UNDERLINE]EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and state laws and regulations.1 The Forest Service has prepared this [BOLD FOLLOWING]draft[END BOLD] environmental impact statement ([BOLD AND UNDERLINE FOLLOWING]D[END BOLD AND UNDERLINE]EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and state laws and regulations.2 Typical uses and activities include land- and water-based recreation (such as camping, hiking, boating, and all-terrain vehicle [ATV] [BOLD FOLLOWING]or off-highway vehicle [OHV][END BOLD] riding),2 Portions of the Forest are within the original Uintah and Ouray Indian Reservation. Local Native American tribes value the lands on the Ashley National Forest for hunting and gathering, ceremonial and traditional uses, and ancestral connections. [BOLD FOLLOWING]This text is repetitive of text appearing earlier on the page and should be deleted.[BOLD END]5 NEPA requires the Forest Service to coordinate planning with other Federal agencies that have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (see 40 CFR 1501.8+.[BOLD FOLLOWING]Should be (see 40 CFR 1501.8).[END BOLD]7 Chapter 1. Purpose of and Need for Action: [STRIKETHROUGH FOLLOWING]The[END STRIKETHROUGH] This chapter includes information on the history of the project proposal, the purpose of and need for the project, and the agency[rsquo]s proposal for achieving that purpose and need.7 This chapter summarizes the information used to compare alternatives [BOLD FOLLOWING]and[END BOLD] contains the detailed basis used to measure the potential environmental consequences of each alternative.11 [STRIKETHROUGH FOLLOWING]Issues[END STRIKETHROUGH] [BOLD FOLLOWING]Commenters[END BOLD] brought up the need to identify high-risk areas for wildfire and employ a variety of methods to treat fire.16 For livestock grazing, forage utilization and stubble height under alternative A would be determined based on site specific conditions to meet land health

standards and based on individual AMPs and permit terms and conditions. [BOLD FOLLOWING]The acronym [ldquo]AMP[rdquo] should be included in the list of acronyms on Pages vii - viii of the DEIS.[END OF BOLD]18 Management under alternative B would also support the maintenance and improvement of resilient ecosystems and watersheds to support wildlife diversity; it would provide ecological conditions to maintain a viable population of each SCC [BOLD FOLLOWING]and common and abundant species[END BOLD] within the plan area [STRIKETHROUGH HERE]and common and abundant species.[END STRIKETHROUGH]18 Specifically for bighorn sheep, management has been included to limit authorization of new permitted domestic sheep or goat allotments unless separation from domestic sheep and goats can be demonstrated, or research [BOLD FOLLOWING]and consultation with state wildlife management agencies[END BOLD] indicates that the potential for pathogen transfer would be limited.19 Increased restrictions on resources uses, such as timber, would support ecosystem services associated with clean water,[STRIKETHROUGH FOLLOWING] including municipal water supplies[END STRIKETHROUGH]. [BOLD FOLLOWING]Restricting timber harvest may enhance water quality but would likely reduce the quantity of water produced by a watershed, which would negatively impact municipal water supplies.[END BOLD]19 In addition, when domestic [STRIKETHROUGH FOLLOWING]sheet[END STRIKETHROUGH] [BOLD FOLLOWING]sheep[END BOLD] or goat grazing permits are voluntarily waived without preference, and if the allotment does not provide separation from bighorn [STRIKETHROUGH FOLLOWING]sheet[END STRIKETHROUGH] [BOLD FOLLOWING]sheep[END BOLD], the allotments would be closed to provide separation between domestic sheep and goats and bighorn sheep.24 Table 2-2 and Pages 207, 210, 247, 249, 250, 251, 252: [BOLD FOLLOWING]The acronym [ldquo]HMs[rdquo] is not listed in the acronyms listed on Pages vii-viii of the DEIS.[END BOLD]25 Table 2-2, Alternative B: New domestic sheep or goat allotments would not be authorized unless separation from bighorn sheep can be demonstrated, or research demonstrates the risk of pathogen [BOLD AND UNDERLINE FOLLOWING]transfer[END BOLD AND UNDERLINE] can be avoided or is no longer an issue[hellip]31 [hellip](particulate matter less than 10 microns in diameter [PM10] and particulate matter less than 2.5 microns in diameter [PM2.5]).[BOLD FOLLOWING] In the definition of acronyms on Page viii, the term [ldquo]micrometers[rdquo] is used rather than [ldquo]microns[rdquo] in defining particulate matter.[END BOLD]32 The State of Wyoming does not have predefined smoke management airsheds (Forest Service 2017b).[BOLD FOLLOWING] This text seems contrary to the text in Footnote #1 on this page.[END BOLD]32 [hellip]a 70-acre portion the Ashley National Forest north of Vernal is at the [STRIKETHROUGH FOLLOWING]northwest[END STRIKETHROUGH] [BOLD FOLLOWING]northeast[END BOLD] extreme of this nonattainment area boundary. [BOLD FOLLOWING]Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.[END BOLD]36 The Ashley National Forest is in conformance with each of the NAAQS, except for 70 acres that fall within the [STRIKETHROUGH FOLLOWING]northwest[END STRIKETHROUGH] [BOLD FOLLOWING]northeast[END BOLD] boundary of the Uintah Basin marginal ozone nonattainment area. [BOLD FOLLOWING]Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.[END BOLD]38 Emissions in the 70-acre portion of the Ashley National Forest that lies in the [STRIKETHROUGH FOLLOWING]northwest[END STRIKETHROUGH] [BOLD FOLLOWING]northeast[END BOLD] boundary of the Uintah Basin marginal ozone nonattainment area would be similar to those that currently occur. [BOLD FOLLOWING]Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.[END BOLD]39 Under all alternatives, vegetation and fuels treatments would be used,[BOLD AND UNDERLINE FOLLOWING]in varying degrees[END BOLD AND UNDERLINE], to reduce tree density and the quantity of surface fuels and to remove insect- affected trees, which, in turn, lowers the risk of severe wildfire. [BOLD FOLLOWING]Alternative C would rely more on natural processes than active vegetation management.[END BOLD]45 Erosion is also a disturbance that often occurs secondarily [BOLD FOLLOWING]because of[END BOLD] changes to the soil surface.48 Soil quality in these areas can be expected to be maintained or altered depending on the management of recreation and livestock grazing impacts. [BOLD FOLLOWING] Fire and fuels management (or the lack thereof) also has a significant impact on soil quality in special designation areas. Focusing solely on recreation and grazing impacts could be interpreted as being bias against those activities.

[END BOLD]51 Under Alternative B, two [BOLD AND UNDERLINE FOLLOWING]additional[END OF BOLD AND UNDERLINE] areas covering 10,300 acres would be managed as wilderness with 230 acres identified as potential wetlands.45 Erosion is also a disturbance that often occurs secondarily [BOLD FOLLOWING]because of[END OF BOLD] changes to the soil surface.48 Soil quality in these areas can be expected to be maintained or altered depending on the management of recreation and livestock grazing impacts. [BOLD FOLLOWING]Fire and fuels management (or the lack thereof) also has a significant impact on soil quality in special designation areas. Focusing solely on recreation and grazing impacts could be interpreted as being bias against those activities.[END BOLD] 51 Under Alternative B, two [BOLD AND UNDERLINE FOLLOWING]additional[END BOLD AND UNDERLINE] areas covering 10,300 acres would be managed as wilderness with 230 acres identified as potential wetlands.53 This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height [STRIKETHROUGH FOLLOWING]exceeds[END STRIKETHROUGH] [BOLD FOLLOWING]exceeding[END BOLD] 4 inches [BOLD AND UNDERLINE FOLLOWING]is rare.[END BOLD AND UNDERLINE]60 Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory from livestock and wild ungulates, fire suppression, roads, and motorized recreation. [BOLD FOLLOWING]Non-motorized recreation can also affect stream dynamics and hydrology, such as non-motorized trail improvements near streams. Failure to list that stressor could be interpreted as showing bias for non-motorized recreation and against motorized recreation.[END BOLD]60 At higher elevations in the Uinta Mountains, these include a glacial lake, potholes, kettle ponds, and beaver ponds. [BOLD FOLLOWING]There is only one glacial lake? Page 64 indicates there are many.[END BOLD]61 Harmful algal blooms have been observed periodically in the upper reaches of Flaming Gorge Reservoir [STRIKETHROUGH FOLLOWING]on[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]in[END BOLD AND UNDERLINE] or near the plan area.61 The area includes a portion of the Ashley National Forest encompassing the Duchesne-Roosevelt Ranger District and portions of the Vernal Ranger District within the Whiterocks River drainage that is within the original treaty boundary of the Uintah and Ouray Ute Indian Reservation (Indian Country). [BOLD FOLLOWING]Please provide a map of what is considered [ldquo]Indian Country[rdquo] by the EPA.[END BOLD]62 There are 14 pipelines that traverse parts of the Ashley National Forest, three of which are used for electricity generation.[BOLD FOLLOWING]Moon Lake Electric is decommissioning the electricity generation facilities in the Yellowstone Canyon and Uinta Canyon areas, so the associated pipelines will be removed. For more information, contact Pat Corun, Moon Lake Electric, 435-722-5400[END BOLD]63 Several municipalities extend their protection areas onto the Ashley National Forest, including the following municipalities in Utah: City of Green River, Duchesne, Whiterocks, Tridell, Vernal, Manila, and Dutch John. [BOLD FOLLOWING]City of Green River, Utah, or Wyoming?[END BOLD]63 The Ashley National Forest also possesses three subbasin claims, with plans to file for additional claims. The Ashley National Forest holds three subbasin claims; [hellip] [BOLD FOLLOWINGNote repetition.[END BOLD]64 Most vegetation is dominated by herbaceous species, especially [BOLD AND UNDERLINE FOLLOWING]in[END BOLD AND UNDERLINE] the [STRIKETHROUGH FOLLOWING]in[END STRIKETHROUGH] northern areas of the FGNRA, with high acreage of irrigation-influenced riparian and wetland areas.66 Conifers are encroaching across elevations on the Uinta Mountains, with 500 acres observed during vegetation mapping (Forest Service GIS 2020). Conifer encroachment is common for the mid- to low elevations and is likely attributed to fire suppression. [BOLD FOLLOWING] 500 acres observed versus [ldquo]common at mid to low elevations[rdquo] seems inconsistent. Is the 500 acres just at high elevations?[END BOLD]70 Allotment level assessments conducted over the past decade have identified specific locations where past livestock [BOLD AND UNDERLINE FOLLOWING]grazing[END BOLD AND UNDERLINE] may be a factor that has contributed to water quality impacts (see for example, Goodrich and Huber 2015).72 These protective plan components would reduce impacts on water quality from surface disturbance, recreation, and motorized and nonmotorized users [BOLD AND UNDERLINE FOLLOWING]but may prohibit certain restoration projects that could benefit water quality in the long term.[END BOLD AND UNDERLINE]72 This raises the possibility of increased sedimentation, higher water temperatures, and shifts in flood severity or frequency, essentially destabilizing watersheds, [BOLD AND UNDERLINE FOLLOWING]when compared to Alternatives B and D.[END BOLD AND UNDERLINE]72 The threat of uncharacteristic wildfire would continue and be the highest of all alternatives, [BOLD AND UNDERLINE FOLLOWING]except for Alternative C, which would have the highest acreage of special designations where

active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment.[END BOLD AND UNDERLINE]74 The threat of uncharacteristic wildfires would continue and would be the highest under all alternatives [BOLD AND UNDERLINE FOLLOWING](except for Alternative C)[END BOLD AND UNDERLINE]; the overall watershed condition would be at risk from uncharacteristic wildfires with the potential to reduce overall WCF scores. [BOLD FOLLOWING]Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire.[END BOLD]76 Recommended wilderness areas include extra protection for riparian and wetland vegetation, including restrictions on surface disturbance, development, and access that would preserve riparian and wetland vegetation and structure in these areas; however, restrictions on restoration [BOLD AND UNDERLINE FOLLOWING]and fuels management[END BOLD AND UNDERLINE] in recommended wilderness could affect the Forest Service[rsquo]s ability to improve [BOLD AND UNDERLINE FOLLOWING]and protect[END BOLD AND UNDERLINE] these riparians, wetlands, and possibly fen communities.77 Alternative B would include plan components that restrict equipment refueling, maintenance, and storage of fuels and other materials in riparian management zones, locating timber roads and infrastructure outside of riparian management zones, and avoiding riparian management zones when [STRIKETHROUGH FOLLLOWING]construction[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]constructing[END BOLD AND UNDERLINE] roads and trails with some exceptions.78 Alternative B would use mechanical treatments and prescribed fire to treat ERUs and move them toward desired conditions. [BOLD FOLLOWING]ERUs is not in the list of acronyms on pages vii and viii.[END BOLD]79 Impacts on water quality would be reduced, compared with alternative A, from reductions in surface disturbance, restrictions on motorized travel, and a reduction in the concentration of recreation users. [BOLD AND UNDERLINE FOLLOWING]However, areas with special designations rely more on natural processes rather than active fuels management and restoration projects, which can lead to increased risk of uncharacteristic wildfire and resultant negative impacts on water quality from [ldquo]flood after fire[rdquo] events.[END BOLD AND UNDERLINE]80 Alternative C would reduce disturbance from such activities as recreation and mechanical treatments, compared with alternative A; however, additional constraints on restoration treatments could also affect the effectiveness of restoration. [BOLD AND UNDERLINE FOLLOWING]Alternative C would rely more on natural processes, which could leave riparian vegetation at greater risk for uncharacteristic wildfire.[END BOLD AND UNDERLINE]82 Improper grazing, such as intensive grazing in riparian, wetland, and fen communities may change the vegetation composition by reducing highly palatable plant species while increasing less palatable plant species, including nonnative and invasive plant species; reduce vegetation cover; diminish plant species richness; and reduce the hydrological function related to the quality and quantity of riparian and green line vegetation. Desired condition plan components common to all action alternatives for riparian areas, livestock grazing, and soil should minimize the potential for adverse impacts related to livestock grazing. [BOLD FOLLOWING]This statement implies that flexible grazing management could lead to improper grazing, which would not be the case if forest service range managers are doing an effective job of managing allotments.[END BOLD]83 Beyond the Ashley National Forest boundary, past, present, and future actions by other entities, as well as activities associated with rural residential communities, [BOLD AND UNDERLINE FOLLOWING]impact watersheds and aquatic and riparian ecosystems.[END BOLD AND UNDERLINE]89 Together, these coniferous vegetation types cover about 53 percent of Ashley National Forest lands, with mixed conifer and [STRIKETHROUGH FOLLOWING]Engelmann spruce[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]Lodgepole pine[END BOLD AND UNDERLINE] comprising the largest amounts. [BOLD FOLLOWING]Table 3-14 indicates more acreage of Lodgepole pine than Engelmann spruce.[END BOLD]93 The most recognized and understood driver of aspen communities is fire. [BOLD FOLLOWING]This sentence occurs twice in the top half of this page (above and below the 3 bullet points).[END BOLD]93 In persistent aspen stands, [STRIKETHROUGH FOLLOWING]Increased[END STRIKETHROUGH] [BOLD FOLLOWING]increased[END BOLD] fire frequency would likely reduce the number of older, declining aspen stands and perhaps improve clone vigor and health with more frequent cohort turnover.93 Due to the limited number of acres of aspen on the Anthro Plateau landtype association, aspen is more susceptible to elk browsing [BOLD AND UNDERLINE FOLLOWING]there[END BOLD AND FOLLOWING] than [BOLD AND UNDERLINE FOLLOWING]in[END BOLD AND UNDERLINE] other aspen-bearing landtype associations.95

Livestock [STRIKETHROUGH FOLLOWING]have grazed[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLLOWING]grazing[END BOLD AND UNDERLINE] has occurred in various forms and intensities for more than 100 years.111 Table 3-18: [BOLD FOLLOWING]Mixed conifer, under Alternative B should be 29,000; not 29,00.[END BOLD]115 [BOLD AND UNDERLINE FOLLOWING]Prescribed fires[END BOLD AND UNDERLINE] [STRIKETHROUGH FOLLOWING]Fires[END STRIKETHROUGH] would be mostly low to mixed severity to reduce conifer competition and maintain or improve ponderosa pine composition and structure where burning occurs.122 Every fire with a resource objective or that escapes initial attack must have a decision in [BOLD AND UNDERLINE FOLLOWING]the[END BOLD AND UNDERLINE] wildfire decision support system.127 Table 3-27: [BOLD FOLLOWING] Please explain to the reader how a flame length can be less than 0 feet. Perhaps it would be better to use [ldquo]unburnable[rdquo] as in Table 3-28?[END BOLD]131 However, with a greater proportion of managed wildland fire, there would be an increased risk of the unintended outcome/consequence that a fire could escape; this could lead to larger wildfires, habitat and watershed damage, and recreation closures. Depending on the extent of such fires, impacts may persist over the long term. [BOLD AND UNDERLINE FOLLOWING]In addition, Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire. Management direction under Alternative C relies on natural processes, which removes many tools otherwise available to reduce the risk of uncharacteristic wildfire.[END OF BOLD AND UNDERLINE]135 The Intermountain Region report indicates between 2005 and 2013, total forest ecosystem carbon in the region increased from 1,069 Tg (teragrams) to 1,084 Tg, [BOLD FOLLOWING](This information is presented in both paragraphs one and two on this page).[END BOLD]147-148 Management concerns related to this species include habitat impacts from invasive plant species, climate change, oil and gas development, predation, and livestock grazing (Forest Service 2017a). [BOLD FOLLOWING]Wildfire, whether natural or human-caused, should be considered as one of the major impacts on greater sage grouse habitat.[END BOLD]153-154 [BOLD FOLLOWING]The analysis assumptions need to address predation of these species, which is one of the major stressors.[END BOLD]160 This is because designated areas would not receive active natural resource management, and the Forest Service would be unable to [STRIKETHROUGH FOLLOWING]purse[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]pursue[END OF BOLD AND UNDERLINE] activities such as habitat restoration and enhancement.165 The area of bighorn sheep CHHR that encompasses timbered stands is not typical bighorn sheep habitat (typically open, alpine areas); however, timber harvest within these atypical areas of CHHR may benefit bighorn sheep by facilitating migration through the timber stands as bighorn sheep move between summer and winter ranges. [BOLD FOLLOWING]The acronym CHHR (Core Herd Home Range) is not listed on Page vii along with other acronyms used in the DEIS.[END BOLD]167 It should be noted, however, that some of the potential impacts [STRIKETHROUGH FOLLOWING]form[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]from[END BOLD AND UNDERLINE] recreational use may be partially offset by opportunities for long term habitat improvements in destination and general recreation MAs, which would allow for initiation of habitat improvement projects.171 Included are 9,000 acres of general Rocky Mountain bighorn sheep habitat, 17,500 acres of Rocky Mountain bighorn sheep CHHR, 3,000 acres of greater sage-grouse habitat, 9,100 acres of lynx [BOLD AND UNDERLINE FOLLOWING]peripheral[END BOLD AND UNDERLINE] habitat, [hellip]173 Because fewer acres of Rocky Mountain bighorn sheep, lynx, and fringed myotis habitat would be suitable for timber production relative to Alternative A, these species would experience reduced impacts from tree removal. The benefit to at-risk species, whose habitat is threatened by conifer encroachment (Rocky Mountain bighorn sheep), from fewer acres of habitat suitable for timber production, would be less relative to alternative B. [BOLD FOLLOWING]These two sentences seem to contradict[hellip]Rocky Mountain Bighorn Sheep suffer negative impacts from tree removal but positive impacts from removal of encroaching conifers.[END BOLD]173 All species may benefit from movement of habitat towards desired conditions in areas where vegetation treatments occur, and to a greater extent [STRIKETHROUGH FOLLOWING]that[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]than[END BOLD AND UNDERLINE] Alternative A.176 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. [BOLD FOLLOWING]With forage utilization and stubble height determined based on land health standards, this should not translate to reduced habitat features provided that USFS range managers are accurately assessing land/range health.[END BOLD]176 This is because overall recreation would be higher intensity with more facilities, roads, and other disturbances. (delete the second of two periods)179 Table 3-44 and associated text: [BOLD FOLLOWING]Is 2020 U.S. Census data available to update this data?[END BOLD]180 Table 3-45 and associated text: [BOLD FOLLOWING]Is 2020 U.S. Census data available to update this data?[END BOLD]180 Table 3-46 and associated text: [BOLD FOLLOWING]Updated employment data for counties in Utah should be available from agencies such as the Utah Department of Workforce Services.[END BOLD]181 Table 3-47 and associated text: [BOLD FOLLOWING]Updated employment data for counties in Utah should be available from agencies such as the Utah Department of Workforce Services.[END BOLD]182 Table 3-48 and associated text: [BOLD FOLLOWING]Updated average earnings and per capita income data should be available.[END BOLD]182 Table 3-49 and associated text: [BOLD FOLLOWING]Updated unemployment data is available from the Utah Department of Workforce Services for counties in Utah.[END BOLD]183 Table 3-50 and associated text: The Ashley National Forest[rsquo]s annual budget (including expenditures and salaries and excluding fire expenditures) was approximately $15.5 million in fiscal year 2017. Approximately 60 percent of the budget was spent on salaries in fiscal year 2017. [BOLD FOLLOWING]Updated expenditure data should be available for federal fiscal year 2021.[END BOLD]184 Table 3-51 and associated text. [BOLD FOLLOWING]PILT and SRS data for 2020 and 2021 should now be available.[END BOLD]184 Footnote to Table 3-51: *Portion of total PILT attributable to National Forest System acres. Additional payments to the analysis area are made as a result of other Federal land management ownership (for example, the BLM).184 The SRSCS, reauthorized in March 2018, was enacted in part to address this decline by stabilizing payments to counties dependent on revenues from Federal timber sales. [BOLD FOLLOWING]The SRSCS program has been authorized again after March 2018.[END BOLD]188 In a 2008 survey of public land uses in Utah (Krannich 2008), 76 percent of respondents from [STRIKETHROUGH FOLLOWING]Dagget[END STRIKETHROUGH], [BOLD AND UNDERLINE FOLLOWING]Daggett[END BOLD AND UNDERLINE], Duchesne and Uinta Counties rated development of energy resources as [ldquo]very important[rdquo] for the quality of life of people living in their communities.189 and elsewhere: 2008 Beliefs and Values study (Russell 2008) [BOLD FOLLOWING]The 2008 Krannich study was based on responses from residents in the Daggett, Duchesne and Uintah County area. Where were the respondents from in the Russell study? If those respondents were not from the proximity of the Ashley National Forest, that may explain how the mindset of the Russell respondents differ considerably from that of the Krannich respondents.[END BOLD]189 Key tribal resources and relevant habitat types are identified in table 3-53, in [ldquo]Areas of Tribal Importance.[rdquo] [BOLD FOLLOWING]Table 3-53 is entitled [ldquo]Minority and Low-Income Populations within the Socioeconomic Plan Area (2018)[rdquo]. Areas of Tribal Importance don[rsquo]t seem to be included in this table.[END BOLD] 197 There are numerous commercial fuelwood operations and five sawmills that process timber in the economic analysis area, as detailed in [ldquo]Timber.[rdquo] [BOLD FOLLOWING]Page 186 states that there are seven local sawmills rather than five.[END BOLD]199 Table 3-57. Recreation Experiences Matrix [BOLD FOLLOWING]The following recreation usage should be recognized in the DEIS:Families use Destination Recreation Areas (see Tables 3-60, 3-61 & 3-62), General Recreation Areas, Trails with Mechanized Access, and Trails withMotorized Access.Large Groups use Trails with Mechanized Access and Trails with Motorized Access.Hunters use Remote areas with low use.Anglers use Destination Recreation Areas, Backcountry Recreation Areas and Developed Recreation sites.Mountain Bikers use Destination Recreation Areas and Backcountry Recreation Areas (see Tables 3-60, 3-61 & 3-62)OHV users use Developed Recreation sites and Backcountry RecreationAreas where there are existing motorized routes (see Tables 3-60, 3-61 & 3-62).Cultural and Historic Site visitors use Trails with Mechanized Access and Trails with Motorized Access to reach these sites.Environmental Justice populations also use Trails with Motorized Access.[END BOLD]202 Overall, oil and natural gas prices have dropped significantly since much higher levels seen earlier this decade. [BOLD FOLLOWING]This statement needs to be updated to reflect the recent rebound in energy prices from the historic lows in 2020 due to travel and gathering restrictions associated with the COVID 19 pandemic.[END BOLD]203 Under all alternatives, grazing on National Forest Service lands will continue to represent only minor contributions to the ability of the traditional use to continue in the area,

particularly for cattle grazing. [BOLD FOLLOWING]This statement seems to conflict with a statement on Page 247, which reads: [ldquo]Although typical operators depend only partially on public lands to sustain their livestock, forage sources on Federal lands still represent a critical part of grazing operations.[rdquo] The state and counties in the planning area feel that the statement on Page 247 is accurate and the statement on Page 203 is not.[END BOLD]204 The lack of quantitative objectives for vegetation treatments under alternative A, [BOLD FOLLOWING]and the limitations on vegetation treatments under alternative C[END BOLD] however, would limit the ability to achieve forest-wide changes.207 This would limit any impacts on environmental justice, [BOLD FOLLOWING]elderly and mobility disabled[END BOLD] communities related to their ability to use preferred recreation sites; it also would minimize constraints on time and costs to travel to recreation.210 Additional recommended wilderness areas could result in site-specific impacts on the access for recreation and the type of recreational uses available, which may disproportionately affect environmental justice, [BOLD FOLLOWING]elderly, and mobility disabled[END BOLD] communities in terms of costs for access.211 [STRIKETHROUGH FOLLOWING]Users[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]User[END BOLD AND UNDERLINE] groups who prioritize developed recreation sites and motorized use may have decreased satisfaction under this alternative, while those who prioritize solitude, and a backcountry experience may have enhanced experiences.213 Under alternative C, however, an emphasis on passive vegetation management [STRIKETHROUGH FOLLOWING]may[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]would[END BOLD AND UNDERLINE] be less effective in trending vegetation types toward the natural range of variation and improving carbon storage capabilities and ecosystem resilience to climate change at large scales, compared with alternative B.213 This would result in an additional potential for site-specific impacts on ability to access recreation areas (in terms of [BOLD FOLLOWING]time and[END BOLD] costs for access).213 Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with Alternative A [BOLD FOLLOWING]however, to a lesser degree than alternative B, due to the restrictions on active vegetation management.[END BOLD]213 Under alternative C, reduced mechanical treatments and reliance on natural processes would reduce short-term impacts from treatment [BOLD FOLLOWING]but provide reduced long-term benefits on ecosystems when compared to alternative B.[END BOLD]213 Exposure pathways[mdash]Impacts under alternative C would be similar to those described under alternative B. Due to a reliance on natural processes, short-term impacts from use of prescribed fire would be reduced compared with other action alternatives; however, emissions would occur from use of managed wildland fires. [BOLD FOLLOWING]Under alternative C, the risk of uncharacteristic wildfire and associated health impacts from emissions would be greater than under alternative B due to the restrictions on active vegetation management in alternative C.[END BOLD]215 Under alternative D, increased mechanical treatments and [BOLD AND UNDERLINE FOLLOWING]less[END BOLD AND UNDERLINE] reliance on natural processes would increase short-term impacts from treatment.215 This would limit impacts on access for environmental justice, [BOLD FOLLOWING]elderly, and mobility disabled[END BOLD] communities.230 Table 3-66: [BOLD FOLLOWING]The table should have a footnote indicating that the Ashley National Forest is in the process of decommissioning and disposing of the Indian Canyon and Stockmore Ranger Stations, which are national register listed properties.[END BOLD]234 Surface-disturbing activities are associated with economic uses of the Ashley National Forest [BOLD FOLLOWING]and may lead to the discovery of previously unknown cultural resources.[END BOLD] [BOLD AND UNDERLINE FOLLOWING]However[END BOLD AND UNDERLINE], [STRIKETHROUGH FOLLOWING]Cultural[END STRIKETHROUGH] [BOLD FOLLOWING]cultural[END BOLD] resources can be directly affected [BOLD AND UNDERLINE FOLLOWING]during surface disturbance[END BOLD AND UNDERLINE] by the modification, displacement, and loss of artifacts, features, and middens, resulting in the loss of valuable cultural resource information on the site function, date of use, subsistence, past environments, and other research questions.235 This [STRIKETHROUGH FOLLOWING]would[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]may[END BOLD AND UNDERLINE] lead to the potential overuse in some areas.236 Vegetation management treatments (such as timber harvest, planned ignitions, thinning, and planting) on 1,500 acres would be targeted annually (1,200 acres annually in the second decade) for resource objectives. This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).237 Vegetation management treatments (such as timber

harvest, planned ignitions, thinning, and planting) on 1,000 acres annually in the first decade and 800 acres annually in the second decade would be targeted for resource objectives. [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years).[END BOLD]238 While the Forest Service would employ other vegetation treatments, there would be an emphasis on timber harvest and production with 1,600 acres annually in the first decade and 1,300 acres annually in subsequent years. [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).[END BOLD]240 Under the 2012 Planning Rule, identification of lands that are suited and not suited for timber production is required on national forests, based on legal withdraw[BOLD AND UNDERLINE FOLLOWING]al[END BOLD AND UNDERLINE], site-specific conditions, and the compatibility of lands with the desired conditions and objectives found within the plan components.241 The lack of natural fire [BOLD AND UNDERLINE FOLLOWING]and the implementation of passive forest management policies[END BOLD AND UNDERLINE] over a century has led to timber stands that are increasingly dense with older trees, and thus more susceptible to insects and disease. Historical fire suppression [BOLD AND UNDERLINE FOLLOWING]and passive forest management[END OF BOLD AND UNDERLINE] has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife.242 The combination of fire suppression, [BOLD AND UNDERLINE FOLLLOWNG]passive forest management[END BOLD AND UNDERLINE] and insect infestation has also resulted in stand conditions that are potentially more susceptible to high- intensity wildfires.245 When compared with alternative A, alternative [STRIKETHROUGH FOLLOWING]B[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]C[END BOLD AND UNDERLINE] would use modern fire-planning tools to determine high-risk areas, which may offer some protection to timber stands suitable for production and harvest.249 Factors affecting livestock operations and range management on the Ashley National Forest are largely based on market demand for livestock and rangeland conditions, both of which are based primarily on forage availability. [BOLD FOLLOWING]The market demand for livestock is based on consumer preference rather than forage availability.[END BOLD]251 Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage [BOLD AND UNDERLINE FOLLOWING]in the short-term, until precipitation or winds remove the dust.[END OF BOLD AND UNDERLINE]253 Fire and fuels management would continue to follow direction outlined in the [STRIKETHROUGH FOLLOWING]proposed[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]existing[END BOLD AND UNDERLINE] plan, though it would not use modern prediction and planning tools to determine high-risk areas.254 Treatments on 1,500 acres of the Ashley National Forest annually (1,200 acres in the second decade) would affect grazing operations through changes in grazing systems; however, these types of management are generally planned around grazing rotations to minimize impacts on grazing operations. [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).[END BOLD]255 These is a small [STRIKETHROUGH FOLLOWING]potnteial[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]potential[END BOLD AND UNDERLINE] for the need for closures of additional acres in pastures where cattle could not be effectively restricted, resulting in additional loss of HMs. These [STRIKETHROUGH FOLLOWING]impactes[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]impacts[END BOLD AND UNDERLINE] would be determined at the site-[STRIKETHROUGH FOLLOWING]specifc[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]specific[END BOLD AND UNDERLINE] level during [STRIKETHROUGH FOLLOWING]implantation[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]implementation.[END BOLD AND UNDERLINE]255 Treatments on 1,000 acres of the Ashley National Forest on an average annual basis (800 acres on an average annual basis in the second decade), [hellip] [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years).[END BOLD]256 Treatments on 1,600 acres of the Ashley National Forest annually (1,300 acres in the second decade) would affect grazing operations through changes in grazing systems; [hellip] [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).[END BOLD]263-264 An act of Congress is not a reasonably

foreseeable action, so environmental consequences on leasable and locatable minerals are expected to be the same as under alternative A. [BOLD FOLLOWING] Even though it cannot be predicted whether Congress will officially designate additional wilderness areas under alternatives B and C, even if these areas are left for a long period of time as recommended wilderness or wilderness study areas, management will preclude any land use that would impact wilderness characteristics. Thus, the environmental consequences for leasable and locatable minerals will be different than under alternative A.[END BOLD]268 Many roadways outside the Ashley National Forest boundaries pass through tribal or BLM lands and provide the only means of access to the national forest; roads accessing the Duchesne Ranger District, for instance, are on tribal lands. [BOLD FOLLOWING]It may be good to note here or elsewhere in the plan that roads crossing tribal lands to access the forest (such as the Rock Creek Road, the Moon Lake Road and the Uinta Canyon Highway) are in very poor condition and that the USFS supports efforts to obtain Federal Land Access Program (FLAP) grants or other funding to improve these access routes.[END BOLD]269 Alternatives are currently being explored for the Old Stockmore Ranger Station, which is located on land not connected to the national forest. [BOLD FOLLOWING]This sentence should be updated as the Ashley National Forest Supervisor recently announced that this facility will be conveyed to the GAO which will then convey it to the Ute Indian Tribe (see https://ubmedia.biz/news/41037/ranger-station-land-going-back-to-ute-indian-tribe/.[END BOLD]271 National direction for Forest Service management actions would continue to affect how infrastructure and facilities are managed across the national forest. Under all alternatives under consideration in this EIS, variable infrastructure and facilities budgets would affect maintenance and further infrastructure development. National direction will also continue to provide forests with guidance in the management of facilities and infrastructure on Forest Service lands. [BOLD FOLLOWING] The first and third sentences above appear to be repetitive.[END BOLD]273 They would accrue from the provision of more dispersed camping docks, mountain bike-designated use, improvements to dispersed camping sites and access roads, OHV loop [STRIKETHROUGH FOLLOWING]tails[END STRIKETHORUGH] [BOLD AND UNDERLINE FOLLOWING]trails[END BOLD AND UNDERLINE], and other recreational facilities.274 Roughly 11 miles of the route will be in the [BOLD AND UNDERLINE FOLLOWING]South Unit of the Duchesne[END OF BOLD AND UNDERLINE] - Roosevelt Ranger District.274 The Round Park Hardened Stream Crossing Project [BOLD AND UNDERLINE FOLLOWING]would provide[END BOLD AND UNDERLINE] hardened ford structures at two stream crossings in the Round Park area.274 The Ashley National Forest offers a variety of developed and dispersed recreational activities, such as camping and picnicking, hiking, mountain biking, horseback riding, wildlife and scenic viewing, hunting and fishing, [STRIKETHROUGH FOLLOWING]enjoying snow sports[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]OHV riding[END BOLD AND UNDERLINE], and rock climbing. Wintertime activities are snowshoeing, cross-country skiing, ice fishing, and snowmobiling. [BOLD FOLLOWING] There is no need to mention [ldquo]enjoying snow sports[rdquo] in the first sentence when the second sentence lists a variety of wintertime (snow) activities.[END BOLD]285 Compared with alternative A, alternative B acres vary only slightly, with a slight increase in motorized ROS classes (ROS roaded and ROS semi-[STRIKETHROUGH FOLLOWING]primtive[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]primitive[END BOLD AND UNDERLINE] [STRIKETHROUGH FOLLOWING]motirozed[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]motorized[END BOLD AND UNDERLINE]) and a shift of some acres from [STRIKETHROUGH FOLLOWING]semiprimtive[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]semiprimitive[END BOLD AND UNDERLINE] [STRIKETHROUGH FOLLOWING]nonmotirzed[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]nonmotorized[END BOLD AND UNDERLINE] to primitive ROS class. Compared with alternative A, this may provide enhanced opportunities for motorized users as well as those looking for less developed, primitive non-motorized recreation experiences. [STRIKETHROUGH FOLLOWING]Altnerative[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]Alternative[END BOLD AND UNDERLINE] B would also include objectives to increase and improve both motorized and [STRIKETHROUGH FOLLOWING]nonmtorized[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]nonmotorized[END BOLD AND UNDERLINE] routes, improving recreation [STRIKETHROUGH FOLLOWING]opprotuntes[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]opportunities[END BOLD AND UNDERLINE] for these users.286 Vegetation management under Alternative B would include annual treatment targets that would result in [STRIKETHROUGH FOLLOWING]changes to sort[END

STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]short[END BOLD AND UNDERLINE] and long-term changes to vegetation structure and related recreational settings.287 It aims to treat 1,000 acres [BOLD AND UNDERLINE FOLLOWING]annually[END BOLD AND UNDERLINE] in the first decade and 800 acres [BOLD AND UNDERLINE FOLLOWING]annually[END BOLD AND UNDERLINE] in the second decade of vegetation management.288 Alternative D aims to treat 1,600 acres [BOLD AND UNDERLINE FOLLOWING]annually[END BOLD AND UNDERLINE] in the first decade and 1,300 acres annually in the second decade of vegetation management.291 The two scenic byways on the Ashley National Forest decision area are the Dinosaur Diamond Scenic Byway (11.8 miles in the decision area) and Flaming Gorge-Uintas Scenic Byway (53.6 miles in the decision area) (Forest Service GIS 2020). Also, the Red Cloud Loop Scenic Backway is 36.2 miles in the decision area, and the Sheep Creek Scenic Backway is 11.4 miles in the decision area. [BOLD FOLLOWING]The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at: https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.[END BOLD]292 Managing for natural-appearing scenery is important to the public. [BOLD FOLLOWING]This blanket statement may not be accurate. There are certain areas of the forest where natural- appearing scenery is important, but other areas, such as in the current Partial Retention or Modification VQO areas, where modifications of scenery would likely be acceptable to the public.[END BOLD]298 The Forest Service would annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternatives A [BOLD AND UNDERLINE FOLLOWING]and C[END BOLD AND UNDERLINE].299 Within the Ashley National Forest[rsquo]s boundaries, landownership (containing surface and subsurface) includes public lands managed by the Forest Service, private inholdings, and Utah State lands and [BOLD FOLLOWING] subsurface mineral resources owned by ??????.[END BOLD]299-300 Land status is determined by legal regulations, restrictions, and permissions on how the land is used or managed for use, including planning, zoning, easements, and other legal designations. [BOLD FOLLOWING]County zoning ordinances and zoning maps do not apply to USFS lands, but they do to inholdings.[END BOLD]300 Under the land adjustment programs, the Forest Service acquires and consolidates key tracts of non-Federal land to conserve valuable natural habitat, reduce the risk of permanent development in sensitive areas, and enhance public recreation opportunities. [BOLD FOLLOWING]The plan should also state that, under the land adjustment programs, the Forest Service may dispose of lands no longer needed to meet Forest Service objectives.[END BOLD]304 Land Withdrawals and Conveyances. This section may be a good place to recognize that certain lands in the Ashley National Forest have been withdrawn from Forest Service management due to the presence of Central Utah Water Project (Bureau of Reclamation) facilities.304 Central Utah Water Project, Bureau of Reclamation. [BOLD FOLLOWING]It would be helpful to know here the acreage of land withdrawn for this purpose and how this impacts forest management. A map should be provided to show the locations of these CUP-BOR withdrawal areas.[END BOLD]307 Under alternative C, one new 1,400-acre RNA and 50,200 acres of new wilderness areas would be designated. Additionally, under this alternative, new ROWs would be considered unsuitable within the RNAs, and the recommended wilderness areas would include 48,600 acres of IRAs. This would decrease the amount of access and land available for special-use authorizations, by 113,000 acres, when compared with alternative A. [BOLD FOLLOWING]How was the total of 113,000 acres calculated?[END BOLD]313 Of the four eligible segments evaluated in the suitability study, none were determined to be suitable for inclusion in the National Wild and Scenic River System in the preliminary suitability determination. [BOLD FOLLOWING]Then why are they being proposed for designation under alternative C?[END BOLD]314 [hellip]scenic backways on the Ashley National Forest are the Red Cloud Loop Scenic Backway and Sheep Creek Scenic Backway. [BOLD FOLLOWING] The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at: https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.[END

BOLD] 314 Red Cloud Loop Scenic Backway[mdash]This backway can be accessed from Highway [STRIKETHROUGH FOLLOWING]131[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]191[END BOLD AND UNDERLINE] in the Vernal area or at its junction with the Flaming Gorge-Uintas National Scenic Byway, located 15 miles north of Vernal.316 Under all alternatives, there would be no changes to the FGNRA, scenic byway miles, national recreation trails, geologic areas, or wilderness areas. These areas would continue to be managed according to the enabling legislation for which they were designated. [BOLD FOLLOWING]How can this be true when alternatives B and C would establish additional potential wilderness areas that would be managed to protect those wilderness characteristics?[END BOLD]317 No acres [BOLD AND UNDERLINE FOLLOWING]within the four recommended wilderness areas[END BOLD AND UNDERLINE] would be found suitable for timber harvest to maintain the option for future designation.See attachment for table: Utah Department of Agriculture food and Technical CommentsReferences Bureau of Land Management. 2005. Implementation of the University of Idaho[rsquo]s Stubble Height Review Team recommendations and upcoming training. From K. Lynn Bennett to District Managers. Boise ID, USA: [ldquo]Bureau of Land Management EMS Instruction Memorandum No. ID2005-074. 3 p.Burkhardt, J.W. 1997. Grazing utilization limits: an ineffective management tool. Rangelands 19 (3 June): p.8-9.Cleary, C.R., S. Anderson, D. Henderson, and J. McLain. 2008. The quandary over short- term indicators. Rangelands Aug 2008: p. 37-39.Oregon State Univ. 1998. Stubble height and utilization measurements: uses and misuses. Oregon State Univ. Exp. Sta. Bull 682. (72 p)Sharp, L. K. Sanders and N. Rimbey. 1994. Management decisions based on utilization [ndash] is it really management? Rangelands 16 (1 Feb): 38-40.Stubble Height Review Team. 2006. Using stubble height to monitor riparian vegetation. Rangelands Feb 2006: p. 23-28.University of Idaho Stubble Height Review Team. 2004. University of Idaho stubble height study report. Moscow, ID, USA: Univ. Idaho Forest, Wildlife & Range Exp. Sta. Contribution No. 986. 26 p.USDA Forest Service. 2005a. Implementation of the University of Idaho[rsquo]s Stubble Height Review Team recommendations and upcoming training. File Code: From Jack Troyer to Region 4 Forest Supervisors. Ogden, UT, USA: USDA Forest Service. 2p.USDA Forest Service. 2005b. Implementation of the principles of obtaining and interpreting utilization data on southwest rangelands. File Code: 2210. From Harv Forsgren to Region 3 Forest Supervisors. Albuquerque, NM, USA: USDA Forest Service. 2 p.

State of Utah Spencer J Cox GovernorDeidre M HendersonLieutenant Governor Office of the GovernorPublic Lands Policy Coordinating Office Redge B. Johnson Executive Director February 17, 2022Submitted via electronic mail: https://www.fs.usda.gov/main/ashley/landmanagement/planningSusan Eickhoff Forest SupervisorAshley National Forest 355 North Vernal Avenue Vernal, Utah 84078Subject: Ashley National Forest Plan Revision Draft EIS RDCC Project No. 81423 Dear Supervisor, Eickhoff:The state of Utah (State) has reviewed the Ashley National Forest Plan Revision Draft Environment Impact Statement (DEIS). The State appreciated participating as a Cooperating Agency in the preparation of the Forest Plan Revision and the DEIS. The State submitted scoping comments on November 8, 2019 and comments on March 10, 2021 and August 3, 2021, and reaffirms those comments and incorporates them by reference. Alternative D seems most consistent with the State[rsquo]s interests. The Forest Service has addressed many of the State[rsquo]s comments in the DEIS, but numerous concerns remain. In collaboration with the Department of Agriculture and Food (UDAF) and the Division of Water Quality (DWQ), the State offers the following general and technical comments for your consideration.General CommentsFuture management of the Ashley National Forest is very important to the State, the affected counties, and citizens who use the forest for a wide variety of recreation activities or to generate income for their families. Decades of passive forest management under the current plan has led to unhealthy forest conditions which make it ripe for disease and uncharacteristic wildfire.Cooperation, Coordination and ConsistencyUnder NEPA, all Federal Agencies must complete a NEPA analysis for proposed actions that are likely to have an impact on the natural or human environment, such as this forest plan revision. Federal Agencies can designate State and Local Governments to become formal partners in the NEPA process, as Cooperating Agencies. A State or Local Government can be a Cooperating Agency when it has special expertise with respect to any environmental impact involved in the project proposal. Cooperating Agency status gives the State or Local Government early input into NEPA analyses and some ability to shape the goals and framework of the Federal proposal. This office appreciates the opportunity to have served as a Cooperating Agency through

the process of developing this environmental analysis.When creating Land Use Plans, the USFS is required to coordinate their Plans with State and Local Government plans. Coordination is a separate process from Cooperation and must occur regardless of whether State or Local Governments were designated Cooperating Agencies. Agencies must make efforts to draft Federal Plans that coordinate with State and Local Plans.The National Forest Management Act requires the USFS to coordinate with local governments but does not specify how the process of coordination is to be accomplished.Forest Service regulations require:- Responsible officials coordinate with local governments.- Responsible officials shall review local plans and policies that are relevant to the federal plan. The review will consider the objectives of local plans, the compatibility and interrelated impacts between local and federal plans, opportunities to address impacts and contribute to joint objectives, and opportunities to resolve or reduce conflicts. This review must be included in the NEPA document.- The responsible official will not direct or control management of lands outside of the planning boundary.Consistency between federal, state, local, and tribal plans is the desired outcome for the coordination and cooperation processes required of federal agencies. The importance of coordination and cooperation between state, local, and Federal agencies during planning processes cannot be overstated. Early involvement and equal consideration in environmental reviews, as Interdisciplinary Team members, stakeholders, and Cooperating Agencies was the State[rsquo]s main objective and motivation for creation of the State Resource Management Plan (SRMP). The SRMP and subsequent implementation plans shall be followed unless inconsistent with any federal statute or duly promulgated regulation.Page 6 of the DEIS states that: [ldquo]The Forest Service collaborated with cooperating agencies throughout the planning process to consider ways the forest plan could contribute to common objectives, address impacts, resolve or reduce conflicts, and contribute to compatibility between the Forest Service and other agencies[rsquo] plans.[rdquo]The state requests that the DEIS be amended to recognize that some of the cooperating agencies have their own resource management plans (such as the State of Utah and all the Utah counties) and indicate whether the Forest Service intends for the forest plan to be consistent with these state and county resource management plans to the greatest degree possible.1FOOTNOTE: 1. www.rmp.utah.govPage 11 of the DEIS states that: [ldquo]The Forest Service also received comments on specific wildlife concerns, including management of bighorn sheep.[rdquo]The State requests that the DEIS recognize that the Forest Service does not manage bighorn sheep or any other type of fish or wildlife. Such is the responsibility of state wildlife management agencies. The DEIS should indicate the type of coordination that occurs between the Forest Service and the state wildlife management agencies and how the results of such coordination are reflected in the forest plan revision.Page 323 of the DEIS addresses [ldquo]Plan Consistency Review.[rdquo] Unfortunately, there is no mention in this section of several inconsistencies between alternatives B and C and Utah State and County Resource Management Plans identified in this letter.Several areas of inconsistency between the proposed forest plan revision and its alternatives are discussed below.Special Designations (Wilderness & Wild and Scenic Rivers)Page 5 of the DEIS states that: [ldquo]Such temporary classifications do not guarantee formal designation, but they do influence forest plan guidance of how to manage the recommended areas.[rdquo]The State[rsquo]s position is that there is no [ldquo]temporary classification[rdquo] established when a recommendation is made for a wild and scenic river or wilderness designation.2 Only Congress has the authority to [ldquo]classify[rdquo] lands or waters as wilderness or wild and scenic rivers. Instead, the term [ldquo]recommended designation[rdquo] (see footnote 1 in Table 2-1) should be used.FOOTNOTE: 2. https://rmp.utah.gov/wp-content/uploads/SRMP_Web.pdfPage 12 of the DEIS states that: [ldquo]All alternatives will provide management direction in keeping with language in legislative direction for the designated High Uinta Wilderness Area (276,175 acres on the Ashley National Forest). Inventoried roadless areas (approximately 637,700 acres on the Ashley National Forest) will be managed in accordance with relevant regulations.[rdquo]This acreage data for the HUWA appears incorrect. There are over 289,000 acres of High Uinta Wilderness acres in Duchesne County alone. Pages 69 and 70 indicate that there are 274,000 acres of HUWA in the Ashley National Forest and page 158 indicates 276,175 acres. The Uinta-Wasatch-Cache National Forest states that this wilderness area accounts for 456,705 acres.3 Please specify the correct acreage in future documents.FOOTNOTE: 3. https://www.fs.usda.gov/detail/uwcnf/about-forest/districts/?cid=fsem_035477Page 17 of the DEIS states that: [ldquo]Alternative B would add additional designated areas to protect special resources. This alternative would include management of two recommended wilderness areas (see appendix A, figure 2-21).[rdquo]Establishing

additional wilderness areas on the forest is inconsistent with the Daggett County Resource Management Plan 4, Duchesne County Resource Management Plan (CRMP)5, Uintah County Resource Management Plan6, and the State of Utah Resource Management Plan (SRMP).7 For example, a significant portion of Duchesne County[rsquo]s land area (13.82%) is already under wilderness designation. These lands, additional wilderness acreage in adjoining counties and inventoried roadless areas on the Ashley National Forest, provide ample opportunities for persons seeking solitude.FOOTNOTE: 4. https://rmp.utah.gov/wp-content/uploads/Daggett-Chap-RMP-FINAL-w-appendix.pdfFOOTNOTE: 5. https://rmp.utah.gov/duchesne-county/FOOTNOTE: 6. https://rmp.utah.gov/wp-content/uploads/Uintah_CRMP_2019_.pdfFOOTNOTE: 7. https://rmp.utah.gov/wp-content/uploads/SRMP_Web.pdfFor example, the Duchesne CRMP 8, in Section 23, contains the following policies associated with Wilderness:FOOTNOTE: 8. https://rmp.utah.gov/wp-content/uploads/Duchesne-General-Plan-2019-update.pdfFor example, the Duchesne CRMP8, in Section 23, contains the following policies associated with Wilderness:1. The county[rsquo]s support for any recommendations made under a statutory requirement to examine the wilderness option during the revision of land and resource management plans or other methods will be withheld until the following are clearly demonstrated that:a. The adopted transportation plans of the state and county or counties within the federal land management agency[rsquo]s planning area (National Forest or BLM land) are fully and completely incorporated into the baseline inventory or information from which plan provisions are derived.b. Valid state or local roads and rights-of-way are recognized and not impaired in any way by the recommendations.c. The possibility of future development of mineral resources by underground mining or oil and gas extraction by directional or horizontal drilling or other non-surface disturbing methods are not affected by the recommendations.d. The need for additional administrative or public roads necessary for the full utility of the various multiple uses, including recreation, mineral exploration and development, forest health activities, operation and maintenance of water facilities, and grazing operations on adjacent land, or on subject lands for grand- fathered uses, are not unduly affected by the recommendations.e. Analysis and full disclosure are made concerning the balance of multiple-use management in the proposed areas.f. The analysis compares the full benefit of multiple-use management to the recreational, forest health, and economic needs of the state and the county to the benefits of the requirements of wilderness management.g. The conclusion of all studies related to the requirement to examine the wilderness option are submitted to the county for review and action, and the results in support of or in opposition to, are included in any planning documents or other proposals that are forwarded to the United States U.S. Congress.h. Areas must merit the suitability requirements contained in the Wilderness Act of 1964 unless requirements are changed by U.S. Congress.3. Any proposed wilderness designations in the county forwarded to U.S. Congress for consideration must be based on a collaborative process in which support for the wilderness designation is unanimous among federal, state, and county officials.8. In accordance with Utah Code 63J-8-104 (b) and (c), it is the policy of the county that federal land management agencies shall:a. Not designate, establish, manage, or treat any of the subject lands as an area with management prescriptions that parallel, duplicate, or resemble the management prescriptions established for wilderness areas or WSAs, including the non- impairment standard applicable to WSAs or anything that parallels, duplicates, or resembles that non-impairment standard.b. Recognize, follow, and apply the wilderness settlement agreement between the State of Utah and the U.S. Department of the Interior.c. Revoke and revise BLM Manuals H 6310, 6320, and 6330.d. Recognize that BLM lacks congressional authority to manage subject lands, other than WSAs, as if they are or may become wilderness.e. Recognize that even if BLM were to properly inventory an area for the presence of wilderness characteristics, BLM still lacks authority to make or alter project level decisions to automatically avoid impairment of any wilderness characteristics without express congressional authority to do so.Furthermore, additional objectives and policies for Uintah County can be found on pages 63 and 64 of Uintah CRMP and for Daggett County on pages 68 through 70 of the Daggett CRMP.Furthermore, the State opposes the recommendation of new Wilderness Study Areas after June 1992.- The State of Utah will actively participate in all public land management planning activities.- The State of Utah opposes any legislation introduced in Congress to designate additional Wilderness Areas except for legislation introduced by a member of Utah[rsquo]s congressional delegation.- The State of Utah opposes any legislation introduced in Congress to designate additional Wilderness Areas unless such legislation is supported by the respective county commission or county council in the county impacted by the proposed legislation.- The State of Utah will actively participate with federal partners in making wilderness

management plans.- The State of Utah opposes the management of non-wilderness federal lands as de facto wilderness, including [ldquo]wildlands,[rdquo] [ldquo]lands with wilderness characteristics,[rdquo] [ldquo]wilderness inventory areas,[rdquo] and other such administrative designations.- The State of Utah opposes the review of additional U.S. Forest Service lands for wilderness, except for the reviews expressly provided for in the Utah Wilderness Act of 1984, [sect]201(b).1. (a) secure for the people of Utah, present and future generations, as well as for visitors to Utah, the benefits of an enduring resource of wilderness on designated state-owned lands.Considering these state and county policies, the wilderness recommendations of alternatives B and C must not be selected. The only alternatives that would be consistent with state and county polices associated with wilderness are A and D.Effects of Wilderness Management on Forest HealthPage 71 of the DEIS states that: [ldquo]Wilderness management protects riparian and wetland ecosystems through minimizing ground disturbance, eliminating motorized access, and reducing recreation use, all of which reduce impacts on riparian and wetland vegetation and inhibit the spread of nonnative species.[rdquo]This may be true in the short term, but the [ldquo]hands-off[rdquo] approach to wilderness management increases the long-term risk of uncharacteristic wildfire, which can destroy riparian and wetland ecosystems, impact air quality, water quality, and cause other downstream impacts.This may be true in the short term, but the [ldquo]hands-off[rdquo] approach to wilderness management increases the long-term risk of uncharacteristic wildfire, which can destroy riparian and wetland ecosystems, impact air quality, water quality, and cause other downstream impacts.Page 71 of the DEIS also states that: [ldquo]Hydrologic processes can be adversely affected by management activities, such as fire suppression, prescribed fire, timber extraction, fuels reduction, noxious weed treatments, road construction, recreation, and livestock grazing.[rdquo]It should be recognized here that hydrologic processes can also be adversely affected by the lack of management activities in special designation areas such as wilderness. The inability to conduct restoration projects in wilderness area will hamper efforts to restore watersheds inside wilderness to properly functioning condition.Page 73 of the DEIS states that: [ldquo]In turn, 1,670 acres of riparian vegetation communities, 1,000 acres of wetland vegetation, and 960 acres of possible or likely ferns would receive increased protection through designation of these river corridors (table 3-9).[rdquo]The 42 miles of the Uinta River tributaries suitable for Wild and Scenic Rivers (WSR) designation are within the High Uintas Wilderness Area; so WSR designation really does not provide increased protection; the protection against management activities, such as timber harvest, is already in place. Multiple layers of special designations within wilderness are not necessary.Page 117 of the DEIS states that: [ldquo]Terrestrial vegetation would be subject to wilderness management direction, as described in [ldquo]Environmental Consequences for Terrestrial Vegetation Common to All Alternatives, in these areas.[rdquo]Here would be a good place to recognize that wilderness management direction relies on natural processes, which removes many tools otherwise available to benefit terrestrial vegetation communities.Page 119 of the DEIS states that: [ldquo]Terrestrial vegetation types, primarily alpine and conifer forest, would be subject to wilderness management direction, as described previously.[rdquo]Again, the State requests that the document be amended here to recognize that wilderness management direction removes many tools otherwise available to benefit terrestrial vegetation communities and wildlife.Page 119 of the DEIS states that: [ldquo]Alternative D also allows for minimum impact suppression tactics only in wilderness. Emphasis is to manage fire for protecting developed resources and would have limited focus to maintain or improve terrestrial vegetation types.[rdquo]It is important to have flexibility in the forest plan revision to suppress naturally occurring fires in wilderness before they spread out of wilderness areas and do tremendous damage to ecosystems. The state recommends adding this flexibility to Alternative B.Effects of Wilderness Management on RecreationPage 15 of the DEIS states that: [ldquo]Mechanized travel (i.e., mountain bikes) is permitted on existing roads and trails.[rdquo]E-bikes continue to grow in popularity as they offer an alternative mode of transportation for those physically unable to pedal a mountain bike over steeper terrain. The DEIS should indicate whether [ldquo]e-bikes[rdquo] are considered motorized travel or mechanized travel and if they would be permitted in special designation areas on the Ashley National Forest.Page 185 of the DEIS (Table 3-52) indicates that the visitor satisfaction levels in designated wilderness areas, (associated with developed facilities and services) rates at 96.6% satisfaction. This data seems suspect when there are no developed facilities or services allowed in wilderness areas.Page 205 of the DEIS states that: [ldquo]Access for recreation would also be maintained for all communities. However, the level of access and the recreational experience may be affected by variation in management areas that restrict future motorized access (i.e., recommended

wilderness).[rdquo]The State requests that the DEIS be amended here to recognize that wilderness areas restrict access to citizens with mobility disabilities and the elderly; many of which also have low incomes and should be part of the environmental justice considerations.Page 206 of the DEIS states that: [ldquo]As discussed in the recreation section, users looking for solitude may have limited opportunities in the Ashley National Forest due to high demand and limited ROS classes with these opportunities.[rdquo] Page 207 states that: [ldquo]However, communities valuing solitude and naturalness for cultural uses may have limited options in the long term.[rdquo]This statement is highly subjective and the State questions these conclusions that there may be limited opportunities/options for solitude considering there are at least 276,175 acres High Uintas Wilderness on the Ashley National Forest (with even more acreage on the Uinta-Wasatch-Cache National Forest) and some 637,700 acres of Inventoried Roadless Areas on the Ashley National Forest that provide ample land area for solitude seekers.Effects of Wilderness Management on the Timber IndustryPage 211 of the DEIS states that: [ldquo]In addition, alternative C has the lowest level of forest product removal of the action alternatives. This is because of an emphasis on natural processes for vegetation management and an increase in the acres managed as recommended wilderness areas and backcountry recreation areas where timber harvest would be restricted. This alternative would result in the lowest availability and removal of forest products and the associated economic effects related to the timber industry. Economic effects of forest product removal under alternative C would support 35 jobs and $1.8 million in labor income in the local economy, annually.[rdquo]Page 244 of the DEIS states that: [ldquo]Alternative B would introduce two additional areas for recommendation as wilderness, totaling approximately 10,300 acres. These newly recommended wilderness areas would prohibit timber production to maintain the option for future designation as wilderness, thus reducing the acres suitable for production when compared with alternative A.[rdquo]Page 245 of the DEIS states that: [ldquo]Alternative C would include the most acres managed to maintain wilderness characteristics; no acres would be found suitable for timber harvest within these areas to preserve the suitability of these areas for wilderness designation. Alternative C would also introduce additional miles of suitable [streams] for inclusion in the NWSRS. This would reduce the available acres for timber harvest.[rdquo]The reduction of lands suitable for timber production in favor of additional wilderness acreage under alternatives B and C would be inconsistent with adopted state and local resource management plan policies as follows:The Daggett CRMP states the following on pages 30-31 regarding forest management and timber:- All forested lands must be managed for sustained yield, multiple use and forest health.- Fire, timber harvesting, and treatment programs must be managed to prevent waste of forest products.- Management programs must provide for fuel load management and fire control to prevent catastrophic events and reduce fire potential at the urban and industrial interface.- Management and harvest programs must be designed to provide opportunities for local citizens and small businesses.- It is the County[rsquo]s policy to protect timber resources and promote the continuation of a sustainable wood products industry.- Sale sizes should provide opportunities for a wide spectrum of producers and allows for local entrepreneurship.- Commercial firewood harvesting is needed and could be a help in fuel load management and fire control. Encourage USFS to open appropriate areas for commercial timber harvest.- Participate in the planning for and revision of USFS forest management plans and Bureau of Land Management resource management plans affecting forest management. When revising or updating a forest plan, USFS should engage with the county in developing alternative management strategies and management policies.- Encourage USFS to find commercial uses for timber and forest products affected by wildfire or pests.- Collect and provide data to USFS regarding appropriate forest management methodologies. Data may include published scientific literature, local case studies, inventories, or other pertinent information.- USFS forest plans should address commercial tree species selection, stocking levels, age class distribution, integrated pest management, and fuel loading. Additionally, areas for timber and nontimber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.- Removal of forest products shall be viewed as achievable and sustainable provided that appropriate science and technology are used.- Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.- Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy

Forest Initiative.- Grazing on national forest land should be tied to historic levels and healthy forest conditions. AUMs should be maintained; vacant allotments should be actively restocked.The Uintah CRMP states the following objectives and policies on pages 25 through 27 regarding forest management and timber:- Use active and adaptive forest management to improve forest health and support multiple use and sustained yield with emphasis on employment, forest product production, open space, wildlife habitat, forage, recreation, and other social and economic benefits.- Manage forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by society, including ecosystem and community health and resilience.- Encourage and support the expansion of the local forest product market at sustainable harvest levels.- Develop new markets for timber and forestry products that are available for harvest (e.g., use timber products for bracing in nearby coal mines or biofuels industry).- When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.- Manage forest watersheds for optimal yield without compromising other resources.- Seek opportunities to use and harvest forest products that have been affected by wildfire or pests (e.g., beetle).- Reduce time required for National Environmental Policy Act processes associated with timber harvests so that economic benefits can be maximized.- Support best management practices that incorporate multiple use and sustained yield for all forest resources.- Participate in the planning for and revision of USFS forest management plans and Bureau of Land Management resource management plans affecting forest management.- Encourage USFS to open appropriate areas for commercial timber harvest.- Encourage USFS to find commercial uses for timber and forest products affected by wildfire or pests.- When revising or updating a forest plan, USFS should engage with the county in developing alternative management strategies and management policies.- Collect and provide data to USFS regarding appropriate forest management methodologies. Data may include published scientific literature, local case studies, inventories, or other pertinent information.- USFS forest plans should address commercial tree species selection, stocking levels, age class distribution, integrated pest management, and fuel loading. Additionally, areas for timber and non-timber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.- Removal of forest products shall be viewed as achievable and sustainable provided that appropriate science and technology are used.- Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.- Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.- Grazing access on national forest land should be tied to historic levels and healthy forest conditions.- Manage forest watersheds for optimal yield without compromising other resources.- Management programs must provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health. Sound economic approaches, considering both long- and short-term goals, Uintah County Resource Management Plan 2017 | 27 shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.- Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.- Management programs must provide for fuel load management and fire control to prevent catastrophic events and reduce fire potential at the urban interface.- Sale sizes should provide opportunities for a wide spectrum of producers and allow for local entrepreneurship.- Uintah County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially with in the county and their suggested future management classifications.- Uintah County supports efforts by the State of Utah to petition the Department of Agriculture and Congress to establish new management provisions for Inventoried Roadless Areas across the state.- Uintah County, along with its General Plan and Resource Management Plan, shall be directly involved in the development and implementation of the Management Plan for the USFS, particularly in regards to planning for the Ashley Karst National Recreation and Geologic Area. Uintah County requires that the Secretary shares such plan with the county before it is finalized. (Amended 8/12/2019)The Duchesne CRMP contains several relevant objectives and policies as follow: Duchesne CRMP, page 31:- (6) Duchesne County supports the wise use,

conservation and protection of public lands and their resources, including well-planned management prescriptions. It is the County[rsquo]s position that public lands be managed for multiple uses, sustained yields, prevention of waste of natural resources, and to protect the health, safety and welfare of the public. It is important to the County economy that public lands be properly managed for fish, wildlife, livestock production, timber harvest, recreation, energy production, mineral extraction and the preservation of natural, scenic, scientific and historical values.Duchesne CRMP, page 35:It is the policy of Duchesne County that multiple-use and sustained-yield management means that federal agencies should develop and implement management plans and make other resource-use decisions that:Are designed to produce and provide the desired vegetation for the watersheds, timber, food, fiber, livestock forage, and wildlife forage, and minerals that are necessary to meet present needs and future economic growth and community expansion without permanent impairment of the productivity of the land;Duchesne CRMP, pages 40-41.Vegetation Management Policies for Special Designation AreasIn special designation areas, permittees, local, state, and federal entities shall cooperate, consult and coordinate in order to actively manage vegetation with a full range of management tools and techniques including, but not limited to, mechanical, chemical, agricultural, natural, or other methods as deemed necessary by the permittee or entity.Duchesne County finds the unhealthy state of the forest and timber resources in the County to be unacceptable. Duchesne County supports proper and active management of forest resources, as well as the myriad of resources that will be adversely affected by catastrophic wildfire. Such active management requires logging, motorized access, mechanical and chemical treatments, as well as monitoring, thinning, reclamation and seeding.Duchesne CRMP, page 42Watershed Policies in Special Designation AreasVegetation management projects in watershed areas shall include restoration and removal or timber to limit wildfire impacts, protect riparian areas, ensure appropriate water flows and enhance water flows.Duchesne CRMP, page 146Forest Management PoliciesManagement strategies shall protect timber resources from fire (in accordance with the National Fire Plan), insects, and disease. Such management strategies shall provide for proper vegetation management practices so that excessive fuel loading and high intensity fires do not damage soil productivity.Duchesne CRMP, page 312Inventoried Roadless Area PoliciesManaging public lands for "wilderness characteristics" circumvents the statutory wilderness process and is inconsistent with the multiple-use and sustained-yield management standard that applies to all BLM and USFS lands that are not wilderness areas or WSAs and adversely affects the counties[rsquo] economy in terms of the grazing, tourism, oil and gas extraction, mining, timber industries, and water resource development.The State of Utah Resource Management Plan contains the following: Utah SRMP, page 114:Forest Management Policies:Encourage timber harvesting to prevent fuel load and biomass buildup.Encourage prompt removal and salvage of drought, fire, and beetle killed timber and reseed or replant as appropriate to maintain healthy forests and watersheds.Utah SRMP, page 134The State of Utah supports the concept of multiple-use and sustained yields on public lands. Federal lands should be managed to produce the maximum yield of timber, forage, recreation, and minerals at sustainable levels. Agriculture is an integral part of the multiple-use concept.Utah SRMP, page 238[sect] 63J-4-401. Planning duties of the planning coordinator and office(6) The state planning coordinator shall recognize and promote the following principles when preparing any policies, plans, programs, processes, or desired outcomes relating to federal lands and natural resources on federal lands pursuant to this section:(ii) multiple-use and sustained-yield management means that federal agencies should develop and implement management plans and make other resource-use decisions that:(D) are designed to produce and provide the desired vegetation for the watersheds, timber, food, fiber, livestock forage, and wildlife forage, and minerals that are necessary to meet present needs and future economic growth and community expansion without permanent impairment of the productivity of the land.Effects of Backcountry Management areas on RecreationPage 71 of the DEIS states that: [ldquo]In general, watersheds with more than 1 mile of road per square mile can be considered to have moderate to high road density (Forest Service 2011c).[rdquo]The state disagrees with this general consideration regarding road density. If a road were 20 feet wide, a mile of road would occupy 105,600 square feet or 2.42 acres of a 640- acre square mile. This is only .00378 percent of a square mile occupied by roads, which is hardly a moderate to high road density.Page 211 of the DEIS states that[hellip] [ldquo]Recreation experience[mdash]As under alternative B, alternative C would include the establishment of recreation management areas. Under alternative C, however, recreation emphasis would focus on expanded backcountry management areas and further restrict motorized use in these areas. This alternative also has the most acres set aside as proposed wilderness, and it includes

additional stream segments managed as suitable for inclusion in the NWSRS.[rdquo]This reduction of motorized recreation opportunities under alternative C in favor of additional wilderness and backcountry management areas would be inconsistent with adopted state and local resource management plan policies associated with motorized recreation as follows:Duchesne CRMP, page 244Public land agencies shall limit OHV[rsquo]s to trails, roads, or areas specifically designated by the agency for that purpose. However, the availability and mileage of such trails should be expanded to meet demand and provide OHV loops that connect communities. Open area riding as well as looped and stacked trail systems should be offered, with a variety of levels of trail difficulty.Duchesne CRMP, page 247In accordance with Utah Code 63J-8-104(g), federal land management agencies shall achieve and maintain traditional access to outdoor recreational opportunities available on federal lands as follows:Hunting, trapping, fishing, hiking, camping, rock hounding, OHV travel, biking, geological exploring, pioneering, recreational vehicle camping, and sightseeing are activities that are important to the traditions, customs, and character of the county and should be allowed to continue.Duchesne CRMP, page 248Existing levels of motorized public access to traditional outdoor recreational designations in the county must be continued, including both snow machine and OHV use, in areas where resource damage is unlikely to occur.Utah SRMP, page 185[sect] 63J-8-104. State land use planning and management program(g) achieve and maintain traditional access to outdoor recreational opportunities available in the subject lands as follows:(i) hunting, trapping, fishing, hiking, family and group parties, family and group campouts and campfires, rock hounding, OHV travel, geological exploring, pioneering, recreational vehicle parking, or just touring in personal vehicles are activities that are important to the traditions, customs, and character of the state and individual counties where the subject lands are located and should continue.Effects of Backcountry Management areas on Timber IndustryPage 245 of the DEIS states that: [ldquo]Under alternative C, there would be an emphasis on management of recreation areas to improve the backcountry experience for recreationists, unlike under alternative A. This management would increase the acreage of backcountry management areas and would prohibit timber harvest within them. This would result in the decreased number of acres suitable for timber production and harvest.[rdquo]Reduction of lands suitable for timber harvest in favor of backcountry management areas would be inconsistent with adopted state and local resource management plan policies, (see policies previously listed under [ldquo]Effects of Wilderness Management on the Timber Industry).[rdquo]Effects of Alternatives B and C and special designations on GrazingPage 18 of the DEIS states that: [ldquo]Under alternative B, forage for livestock grazing would have specific utilization levels included in management (50 percent) as well as 4-inch stubble height guidelines to provide criteria to help meet desired conditions for terrestrial vegetation.[rdquo]Establishing one-size-fits-all utilization levels and stubble height guidelines is inconsistent with the state and county resource management plans. If exceptions or on-site modifications are allowed under Alternative B, please indicate here. A more flexible, adaptive management approach, such as proposed in Alternative D, accounting for range conditions at site-specific locations, should be used to meet desired conditions.Pages 210-211 of the DEIS state that: [ldquo]An alternative assumption (that all affected pastures would be closed and not proportionally reduced) would result in a larger reduction of HMs[mdash]a loss of 3,318 HMs[mdash]and a small, but measurable, impact on the regional economy. 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 closure of these allotments would result in an estimated loss of 7 jobs and $120,000 in labor income on an average annual basis. This would result in the lowest estimated HMs of all alternatives and the lowest level of economic effects, in terms of jobs and income related to livestock grazing.[rdquo]Pages 251-252 of the DEIS state that: [ldquo]The most likely impact from management of recommended or designated wilderness would be alterations to the timing and intensity of grazing operations to meet desired conditions to maintain wilderness character. Other potential impacts on grazing management due to recommended or designated wilderness include impacts to access of allotments for maintenance of structural range developments, the ability to haul salt and minerals, and the retrieval of sick animals due to restrictions on motorized use.[rdquo]Page 253 of the DEIS states that: [ldquo]Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches unless monitoring indicates a different level sufficient to meet and maintain desired conditions (table 3-68). In areas where these guidelines are not met and exceptions are not made, there could be modifications to the timing and intensity of grazing operations, particularly adjustments to livestock numbers or season of use, or both, and associated reductions in numbers and season of use permitted to grazing operators, when compared

with alternative A.[rdquo]Page 254 of the DEIS states that: [ldquo]Under alternative C, forage for livestock would be limited to a level of 40 percent utilization and a stubble height of 4 inches (table 3-71). Exceptions will not be made for utilization levels and stubble-height guidelines.[rdquo]The one-size-fits-all utilization and stubble height standards and restricting the timing and intensity of grazing in favor of increased areas managed to maintain wilderness characteristics under Alternatives B and C (see previous four references above) is inconsistent with adopted state and local resource management plan policies listed below.The flexibility in Alternative D is preferable.Daggett CRMP, page 29:When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.Daggett CRMP, page 31:Grazing on national forest land should be tied to historic levels and healthy forest conditions. AUMs should be maintained; vacant allotments should be actively restocked.Daggett CRMP, page 39:Daggett County opposes the reduction, relinquishment, or retirement of grazing AUMs in favor of conservation, wildlife, and other uses.Uintah CRMP, page 20:When sustainable and based on scientific knowledge and local data, increase grazing (allotments, AUMs, or seasonal use) to reduce fuel loads.Uintah CRMP, page 24:When sustainable and based on scientific knowledge and local data, increase grazing to historic levels (allotments, AUMs, or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.Uintah CRMP, page 38:The county opposes the reduction, relinquishment, or retirement of grazing AUMs in favor of conservation, wildlife, and other uses.Land management plans, programs, and initiatives should provide the amount of domestic livestock forage, expressed in AUMs, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of AUMs sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.Duchesne CRMP, page 34BLM and Forest Service land use plans should produce planning documents consistent with state and local land use plans to the maximum extent consistent with federal law and FLPMA's purposes, by incorporating the state's land use planning and management program for the subject lands that preserve traditional multiple use and sustained yield management on the subject lands to:1. Achieve and maintain in perpetuity a high-level annual or regular periodic output of agricultural, mineral, and various other resources from the subject lands;2. Support valid existing transportation, mineral, and grazing privileges in the subject lands at the highest reasonably sustainable levels;Duchesne CRMP, pages 97-100Consistent with the state laws associated with grazing on federal lands, it is the position of Duchesne County that:Well managed livestock grazing, though poorly understood by the average citizen, is the most effective way to manage vegetation on a large scale to benefit watershed health and preserve wildlife habitat.Improving grazing management on Duchesne County[rsquo]s private and public lands should be viewed as a long-term priority.Public lands shall be managed to maintain or increase forage allocation for livestock grazing. Annual monitoring should be done to verify whether desired conditions are being maintained.Public land agencies shall maintain livestock grazing permits and grazing allocations at present levels unless a study of rangeland conditions justifies increased or decreased grazing. The county recognizes that drought, wildfire, and other factors may affect the terms of grazing permits.The County opposes the reduction, relinquishment, or retirement of grazing animal unit months in favor of conservation, wildlife, and other uses. Any decreases should be temporary in nature due to ever-changing range conditions. The county expects the Utah Division of Wildlife Resources to coordinate with land management agencies as they manage forage and grazing allotments for the benefit of livestock and wildlife populations.Land management plans, programs, and initiatives should provide that the amount of domestic livestock forage, expressed in animal unit months, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of animal unit months sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.The County favors the best management practices that are jointly sponsored by cattlemen's, sportsmen's and wildlife management groups such as chaining, logging, seeding, burning, and other direct soil and vegetation prescriptions that are demonstrated to restore forest and rangeland health, increase forage, and improve watersheds in grazing districts and allotments for the mutual benefit of domestic livestock and wildlife. When the practices described above increase a grazing allotment's forage beyond the total permitted forage use that was allocated to that allotment in the last federal land use plan or allotment management plan still in existence as of January 1, 2005, a reasonable and fair portion of the increase in forage beyond the previously allocated total permitted use should be allocated to wildlife as recommended by a joint, evenly balanced

committee of livestock and wildlife representatives that is appointed and constituted by the governor for that purpose. The County favors quickly and effectively adjusting wildlife population goals and population census numbers in response to variations in the amount of available forage caused by drought or other climatic adjustments, and state agencies responsible for managing wildlife population goals and population census numbers will give due regard to both the needs of the livestock industry and the need to prevent the decline of species to a point where listing under the terms of the Endangered Species Act when making such adjustments.Access to public rangeland is a valid existing right that is vital to the permit-holders and the land management agency for planning, management, and development.Access shall be maintained open and shall be improved as management needs require.Reductions in domestic livestock animal unit months must be temporary and scientifically based upon rangeland conditions. Reductions in AUMs should be allocated on a species basis [wildlife, wild horse, wild burros & livestock] with a percentage allocated to each species type. The only justification for decreasing domestic livestock grazing AUM[rsquo]s is for there to be a valid and documented scientific finding that the range district will no longer support the AUM[rsquo]s in question. The BLM and Forest Service are expected to comply with and honor the domestic grazing preference on grazing districts. Likewise, the permittee is also expected to abide by the terms and conditions identified in the grazing permit.Federal policies, plans, programs, initiatives, resource management plans, and forest plans may not allow the placement of grazing animal unit months in a suspended use category unless there is a rational and scientific determination that the condition of the rangeland allotment or district in question will not sustain the animal unit months sought to be placed in suspended use. Any grazing animal unit months that are placed in a suspended use category should be returned to active use when range conditions improve.Management decisions shall be based on the individual range allotment condition and not on the overall condition of surrounding lands. Increases in available forage resulting from the conservation practices of livestock permit-holders shall not be allocated or credited to other uses.Changes in season of use or forage allocation must not be made without full and meaningful consultation with permittee. The permittee must be the first point of contact.The continued viability of livestock operations and the livestock industry shall be supported on federal and state lands within Duchesne County by management of the lands and forage resources and the optimization of animal unit months for livestock in accordance with the multiple-use provisions of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et seq., the provisions of the Taylor Grazing Act of 1934, 43 U.S.C. 315 et seq., and the provisions of the Public Rangelands Improvement Act of 1978, 43 U.S.C. 1901 et seq.Utah SRMP, page 149The State of Utah supports the concept of multiple-use and sustained yields on public lands. Livestock grazing is an integral part of the multiple-use concept. Reductions of livestock numbers through frivolous lawsuits and barriers to infrastructure improvements and maintenance necessary for effective grazing management are unacceptable.Utah SRMP, page 140The state of Utah adopts a no-net-loss stance concerning grazing AUMs on federal lands.Page 255 of the DEIS states that: [ldquo]Alternative C would have the highest percentage of the Ashley National Forest managed as designated areas; however, none of the acreage of the proposed designated areas overlapping current grazing allotments would preclude grazing. Some impacts may occur, however, related to the ability to access and maintain allotments in proposed wilderness areas, as described under [ldquo]Environmental Consequences for Livestock Grazing Common to All Alternatives.[rdquo][rdquo]Although grazing would not be precluded in new designated areas under Alternative C, the restrictions on the ability to access and maintain allotments in proposed wilderness areas would be inconsistent with state and county resource management plan policies listed above.Effects of Alternatives B and C Scenery Requirements on Utilities and InfrastructurePage 273 of the DEIS states that: [ldquo]The prohibition of new communication sites, roads, utility corridors, and other infrastructure in recommended wilderness areas would be the same as described under alternative B; however, recommended wilderness would occur over a greater area of the national forest. This would constitute 50,200 acres under alternative C, compared with 10,300 under alternative B. Any maintenance to dams, bridges, and administrative and drinking water facilities would require methods designed to ensure preservation of wilderness values. This would result in increased maintenance costs associated with compliance.[rdquo]Another reason that alternative C is not acceptable to state and local governments is the increased costs of maintaining water infrastructure in wilderness areas or wilderness study areas. For example, recent stabilization of a high mountain lake in the High Uintas Wilderness cost some $600,000 more than it normally would have due to the requirement to airlift equipment to the job site by

helicopter.Page 296 of the DEIS states that: [ldquo]Under alternative C, SIO acres would be assigned to the forest, as shown in table 3-84 (see figure 2-10). Alternative C would increase the number of acres in areas where the management emphasis would maintain or enhance the valued scenic character. This is because 74 percent of the lands would have high or very high SIOs, compared with 51 percent under alternative A.[rdquo]This high percentage of high or very high SIO[rsquo]s under alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with state and county resource management plans policies set forth in this letter, including the provision of utilities and infrastructure, such as communication towers and transmission lines needed to serve a growing population and a growing renewable energy power grid.Page 297 of the DEIS states that: [ldquo]Every 5 years, the Forest Service would consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternative A.[rdquo]If the need for an easement arose, a proponent should not have to wait for the beginning of the next 5-year review period before such easement could be considered. The annual review in alternative D is preferable for flexibility in responding to easement requests.Page 299 of the DEIS states that: [ldquo]Therefore, when combined with the impacts described above from reasonably foreseeable future actions, alternative C would have the fewest cumulative impacts on the scenic character.[rdquo]While alternative C would preserve scenic character to the greatest degree, this high percentage of high or very high SIO[rsquo]s under alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with state and local resource management plan policies contained in this letter.Page 304 of the DEIS states that: [ldquo]Recent increased activity in large transmission projects, such as the Zephyr, Energy Gateway South, and Transwest Express projects, demonstrates that along with increased interest in communication uses and technologies, the demand for enhanced energy infrastructure and electrical connectivity is on the rise and is expected to increase.[rdquo]The high percentage of high or very high SIO[rsquo]s under alternative C would likely impact the ability of the Ashley National Forest to accommodate these increasing demands for energy transmission infrastructure to the detriment of clean energy development and reliability of the power supply in the western grid.Utah Department of Agriculture and FoodStubble Height and Utilization Rate StudiesThe Forest Service and BLM commissioned at the University of Idaho Stubble Height Review Team in 2003 to review the use of these standards. Subsequently, direction was given to both BLM and Forest Service in 2005 to modify wording in Annual Operating Plans (Bureau of Land Management 2005, K. Lynn Bennett to Idaho District Managers; USDA Forest Service 2005a, Jack Troyer to Region 4 Forest Supervisors; USDA Forest Service 2005b, Harv Forsgren to Region 3 Forest Supervisors).[ldquo]Agencies should modify the wording in permits and Land Use Plans to use stubble height criteria, not as a compliance standard, but as:1) a [ldquo]trigger[rdquo] to assess when livestock should be moved from a grazing unit; 2) an annual [ldquo]prompt[rdquo] to investigate and assess the riparian resource condition.[rdquo] (Cleary et al. 2008).The following documents review the science these recommendations are based upon:WCC 1998, Utilization Standards Report (Oregon State Univ. Exp. Sta. Bull 682, 1998)A symposium was held during the 1997 SRM annual meeting inviting Range researchers and Agency Administrators to evaluate Utilization Standards. The two sponsoring Western Coordinating Committees (WCC 40 Rangeland Ecological Research and Assessment, WCC 5 Rangeland Resource Economics and Policy) were concerned that utilization estimates often are used incorrectly in making rangeland management decisions.-https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7Sanders (1998) and Sharp et al. (1994) thoroughly reviewed the history and use of Utilization standards. Sanders concluded utilization standards should not be used as goals or objectives in allotment management plans. Emphasis should be placed on monitoring long- term trend on both uplands and riparian areas. Utilization and stubble height information could be used as management tools to determine when to move out of a pasture.-https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 3)Smith (1998) reviewed the seasonal effects of defoliation. He concluded Utilization Standards of individual species has little or no relevance to the subsequent growth or reproduction of the plant unless the phenological stage of growth when use occurs is specified. Timing of use has more impact than the amount of use.-https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 9)Rasmussen (1998) presented data that showed no significant correlation between yearly utilization and long-term trend. He

reported research from Cook (1966) and Olsen and Richards (1989) that showed phenological stage of plant growth when grazed is more important than degree of use in determining subsequent growth and vigor of a plant. Early- season (vegetative stage) and late-season (seed ripe) heavy use had little long-term impact on plant production. Rasmussen concluded that utilization is not very useful in determining the relationship between management and long-term trend of rangelands.- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 25)Laycock (1998) reviewed studies on the accuracy of utilization methods. He reported both the ocular estimate by plot and the caged/open clipped plot methods overestimate utilization by 30% or more. Differences among individuals, even trained observers, are very high. Utilization between years varies in proportion to the annual production, which is determined by precipitation, and thus cannot be relied on to establish a trend or pattern. He concluded the accuracy and precision of utilization estimates are not very high, and at best should be used as an index of use, not an exact figure.- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 17)Krueger (1998) summarized the main points of the symposium. He listed the concerns of the scientists about agency administrators applying utilization methodologies in inappropriate ways, either in the context of using them as management objectives, or by misapplication of the methods. The prominent area of agreement was that utilization is a land management tool (to be used in determining when to move to a new pasture), not a land management objective. The most accepted use of utilization techniques is to develop large-scale utilization maps to highlight areas of livestock concentration and low use.Management strategies could then be used to improve livestock distribution to even out utilization. If numbers are collected as part of the monitoring program, they always should be statistically analyzed so the decision maker knows the quality of the information.- https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/sb68 2.pdf#page=7 (page 71)Stubble Height Review Team (Rangelands, Feb 2006, p.23-28; Rangelands Aug 2008, p.37-39; Univ. ID Exp. Sta. Contribution No. 986) A Review Team was commissioned in 2003 by BLM Idaho State Director K. Lynn Bennet and Intermountain Region 4 Forester Jack G. Troyer to evaluate the use stubble height standards for Allotment Management Plans (Stubble Height Review Team, 2006). Each administrator sent out memos adopting and implementing the review team recommendations (Bureau of Land Management, 2005), (USDA Forest Service, 2005a). Southwest Region 3 Forester Harv Forsgren also issued an instruction memorandum to implement these findings (USDA Forest Service, 2005b).- https://journals.uair.arizona.edu/index.php/rangelands/article/download/121 33/11411The Review Team found, [ldquo]Unfortunately, the linkages between stubble height and riparian functions have had limited experimental examination[hellip]Stubble height as an annual indicator of grazing use in riparian areas should only be used in combination with longer- term monitoring of vegetation and channel parameters.[rdquo][ldquo]Although stubble height is easy to use, it is not a resource objective and therefore inappropriate as a prescriptive standard in grazing permits and land use plans. It should be used as a guideline or indicator for changing annual management in Annual Operating Instructions/Plan[hellip] It could be used as a trigger for when livestock should be moved from the grazing unit.[rdquo][ldquo]To properly manage the grazing operation, the current condition and trend of the long-term riparian management objectives would be compared with the desired condition of those objectives to assess the need to adjust grazing use.[rdquo][ldquo]Agencies should modify the wording in permits and Land Use Plans to use stubble height criteria, not as a compliance standard, but as 1) a [ldquo]trigger[rdquo] to assess when livestock should be moved from a grazing unit; and 2) and annual [ldquo]prompt[rdquo] to investigate and assess the riparian resource condition.[rdquo]Burkhardt 1997 Riparian Grazing StrategyAgency administrators have based grazing management decision solely on achieving predetermined use levels at [ldquo]key sites[rdquo]. This approach may provide simple and efficient [ldquo]grazing administration[rdquo], but it does not result in effective [ldquo]grazing management [ldquo]Utilization standards are not an appropriate substitute for [ldquo]on the ground management[rdquo] combined with objective monitoring of resource trends. The degree of defoliation is not singularly and linearly related to plant health. Proper season of use and rest are far more effective for dealing with most riparian grazing problems than are use limits.Proposed Grazing Strategies in Riparian AreasLarge Meadow Systems: Early season grazing and hot season rest or summer use rotation. Large meadow complexes should be used and managed independent from the surrounding uplands.Narrow Wooded Stream Bottoms within mountain canyons:These are concentration areas and enforcement of conservative use limits cannot effectively be

accomplished. Apply cool season or early grazing and hot season rest or rotation. Develop upland water sources and herding to remove animals from bottoms.Upland Springs:Fence and pipe a portion of the water to upland water troughs.- https://journals.uair.arizona.edu/index.php/rangelands/article/view/11328/1 0601Division of Water QualityDWQ also oversees the classification, protection, and remediation of the waters of the state (Clean Water Act (CWA) [sect]304 and Utah Code [sect]19-5-110). DWQ[rsquo]s responsibilities include development of water quality standards, water quality monitoring and assessment, development of total maximum daily load plans (TMDLs) to restore impaired waters to their designated beneficial uses, issuance of Utah Pollution Discharge Elimination System (UPDES) discharge permits, issuance of CWA [sect]401 water quality certifications for federal licenses or permits (including U.S. Army Corps of Engineer[rsquo]s CWA [sect]404 Permits), and the implementation of nonpoint source projects to improve water quality.WatershedsThe Ashley National Forest is an important source of high-quality water for local and regional ecosystems, recreational activities, fisheries, irrigation, and drinking water. Sound management of the watershed through the Revised Forest Plan will ensure that these resources continue to provide multiple benefits to the region and the state. The management direction proposed in the DEIS to [ldquo](incorporate) forest-wide desired conditions, standards, and guidelines that together provide more detail and clarity regarding the conditions and management of watersheds that would contribute to the overall goal of maintaining the integrity and resilience of watersheds and riparian, wetland, and fen vegetation communities on the national forest[rdquo] supports water quality and watershed health (pg. 74).DWQ supports the desired watershed conditions identified in the Ashley National Forest Land Management Plan (Appendix E, Chapter 2, pg. 13-14). Healthy, resilient watersheds provide clean water for downstream communities, help waterways meet their designated beneficial uses (see UAC R317-2-6), protect water quality and public health, and provide ongoing benefits from multiple use of forest resources.The DEIS identifies nonpoint source (NPS) pollution as a primary source of water pollution on the National Forest (pg. 55). The DWQ agrees that NPS pollution poses a threat to water quality and supports the use of management guidance and best management practices (BMPs) to reduce NPS pollution in the forest.According to the Watershed Condition Framework (WCF) referenced in the DEIS, fifty-three percent (53%) of the watersheds in the forest are functioning properly, while forty- seven percent (47%) are functioning at-risk. The DEIS notes that [ldquo]the distribution of overall scores indicate that seventy percent (70%) of watersheds scored near the break between properly functioning and functioning at-risk watershed condition. Changing one or more attributes could shift the classification one way or another, indicating opportunities to improve watershed condition but also degrade watersheds through mismanagement[rdquo] (emphasis added) (pg. 52). It is important that Forest Plan guidance and management ensures watersheds are functioning properly and their conditions are improving rather than degrading.The DEIS notes that [ldquo](f)or the Ashley National Forest, watershed vulnerability to climate change is considered moderate to high[hellip]Watersheds functioning at risk are more vulnerable to climate change effects. This is due to the impaired function of terrestrial physical processes, including high road densities and poor road and trail conditions[rdquo] (pg. 59). The Forest Service should prioritize maintenance or relocation of roads and trails to prepare for an influx in travel and ensure the continued health of forest watersheds.The three priority watersheds identified in the plan (Cart Creek, Wolf Creek, and Whiterocks River) align well with DWQ[rsquo]s objectives to restore impaired waters and protect existing water quality resources. Cart Creek and the West Fork Duchesne River are waterbodies within the forest that are on the 303(d) impaired list, and Ashley Karst National Recreation and Geologic Area and Flaming Gorge Reservoir are important water resources. DWQ looks forward to working with the Forest Service on restoration work in these priority watersheds.Aquatic EcosystemsDWQ agrees with the DEIS that [ldquo](t)he diverse ecosystems of the Ashley National Forest are a key component to supporting and maintaining its social and economic values. Functioning and resilient terrestrial and aquatic ecosystems contribute to healthy forests and rangelands, abundant fish and wildlife, healthy watersheds and abundant water supplies, beautiful landscapes, and a variety of other ecosystem services[rdquo] (Appendix E, pg. 7).Aquatic life is an important beneficial use for rivers and streams in the Ashley National Forest. These waters provide spawning and rearing habitat for rainbow, brown, and brook trout and the macroinvertebrates that support them. Fish passage connectivity ensures adequate habitat through fish life cycles. Management goals and objectives in Alternative B and the Draft Revised Management Plan (Appendix E) for adaptive and proactive management of riparian areas; habitat connectivity from headwaters to downstream areas; management and treatments that reduce nonpoint source pollution to waterways from sediment and

animal waste; conifer removal to prevent encroachment on wet meadows in upland areas; stream channel restoration to restore aquatic habitat, reduce elevated stream temperatures, and increase bank stability; and the use of beavers to reestablish healthy river ecosystems will support healthy aquatic life and the proper functioning of aquatic ecosystems.SoilsHealthy soils are integral to healthy rivers and streams. Forest management that prevents soil erosion protects stream channels, riparian areas, and the habitat required to support aquatic life beneficial uses.Fire and fuels treatments can help reduce the risk of soil erosion from wildfires, enhance water yields from watershed, and treatment strategies that protect soils also protect water quality. For example, the proposed guidelines to leave coarse, woody debris over portions of the plan area will support soil stability and reduce the erosion potential after treatment. Other guidelines for vegetation and timber management that limit soil disturbance to no more than fifteen percent (15%) of the area from cumulative activities and encourage mitigation measures if the disturbance exceeds this limit will help reduce soil erosion into waterways. Management decisions to avoid activities that increase soil compaction on steep slopes and sensitive areas (such as riparian areas, wetlands, and seeps, and erodible soils) protect water quality by reducing sedimentation in rivers and streams.FireAccording to the WCF, ninety percent (90%) of watersheds in the Ashley National Forest had fair scores for the fire regime, indicating an increased potential for high-intensity wildfires that may affect the overall watershed condition. The proposed risk management approach in the DEIS promotes resilient landscapes that protect water yields, water quality and water resources. Collaborative planning through programs like Shared Stewardship can create fire-adapted ecosystems across public and private lands in, and adjacent to, the forest. DWQ supports the use of fire and fuel treatments in a manner that reduces the risk of uncontrolled wildfire while protecting water yields, water quality and watershed health and resilience.Recreation and RoadsThe focus in Alternative B on recreation management will offer users a variety of developed and dispersed recreation opportunities in the forest. However, the DEIS acknowledges that the proposed increase in recreation management increases the potential for soil compaction, displacement of sensitive soils, and erosion, all of which could harm the proper functioning of wetlands and the water quality of rivers and streams in the plan area. Recognizing the potential negative impacts of increased travel on motorized routes, the Forest Service should take steps to protect those watersheds that rate either fair or poor on the roads and trails indicator for the WCF score. (85%). DWQ recommends the Forest Service consider the potential for increased sediment, higher stream temperatures, and decreased vegetative cover while choosing an alternative that can also accommodate increased travel and recreation.The Forest Service should give special consideration to those watersheds that may be at risk if there is a dramatic increase in road density following the expansion of the forest trail systems. According to the plan components in Alternative B, the Forest Service would avoid wetlands and unstable areas, consider impacts on streams when reconstructing or constructing new roads, reduce impacts on watershed condition from any new roads or trails, and not appreciably reduce WCF scores for the roads and trails condition indicator. DWQ anticipates that the Revised Forest Plan will include details about or references to maintaining water quality and wetlands from the potential impacts of new and existing roads and trails.GrazingAs was noted in the DEIS, livestock and ungulate grazing can impact riparian and wetland ecosystems and can adversely and directly affect water quality (pg. 69-70).Streambank erosion from livestock and ungulate grazing can contribute to sedimentation, turbidity, and stream channelization. Loss of riparian vegetation can increase stream temperatures to levels that stress aquatic life. Nutrient loading to streams from livestock and ungulate waste and organic matter can increase algal growth and ammonia concentrations and decrease dissolved oxygen levels. These nonpoint source pollutants can impact aquatic species and their habitat and impair streams for their designated beneficial uses. Successful partnerships between the State and U.S. Forest Service such as the Grazing Improvement Program led by the Utah Department of Agriculture and Food can help protect water quality by developing new water sources for use by livestock and ungulates and reduce impacts on streams and riparian areas. The U.S. Forest Service should continue to work with the State on implementation of such programs to improve water quality while also supporting continued livestock production and big game hunting on the Ashley National Forest.The proposed establishment of riparian management zones (RMZs) would help mitigate impacts to riparian areas from livestock and ungulate use. The flexibility in the proposed plan to allow adjustments for site-specific conditions could be used to manage livestock and ungulate use of riparian areas experiencing water quality issues. The Forest Service could identify potential conflicts through a grazing-RMZ crosswalk between grazing allotments and riparian area usage. The crosswalk could serve as a management

tool/early warning system to protect riparian areas and water quality through adjustments to grazing levels/timing/duration in RMZs.DWQ recognizes that well-managed grazing is an important tool to manage vegetation that, if left un-managed, will increase fuel loads that result in uncharacteristic wildfire that will have negative impacts on water quality.Timber HarvestingTimber harvesting is an important multiple use of the forest, and a certain number of trees and other vegetation must be removed in watersheds to reduce fuel loads and enhance the supply of water produced by watersheds. However, timber harvesting, and vegetation treatments can also compromise hydrologic function and increase erosion if conducted in steeply sloping areas. When identifying areas as suitable or not suitable for timber production, the Forest Plan should take into consideration the impact of timber harvesting/thinning on watershed health and water quality. Harvesters should take soil stability and degree of slope into consideration when operating to maintain soils and water quality and prioritize the use of existing roads whenever possible.Operations should utilize existing roads wherever possible, minimize construction of new roads, and site and design new roads in a manner that reduces erosion and impacts to water quality. The proposed plan notes that areas deemed suitable for timber production could impact springs and seeps, and soils would be vulnerable to soil compaction, displacement, and erosion from equipment. A crosswalk between areas identified as suitable for timber harvest and the guidelines to protect waterbodies, soils, and watersheds (Appendix E, Ashley National Forest Plan, Chapter 2, pg. 45) would help ensure that adverse impacts to water quality are kept to a minimum, while providing for timber harvest necessary to maintain sufficient water yields.Relevant Water Quality Rules and ReportsRecent DWQ actions relevant to Forest Plan implementation are provided here for reference:1.Headwaters Numeric Nutrient Criteria Rule (R317-2-14)The Headwaters Numeric Nutrient Criteria Rule (2020) is applicable to all Category 1 and Category 2 streams in the Ashley National Forest for Recreation (Classes 2A and 2B) and Aquatic Life (Classes 3A, 3B, 3C, and 3D (1))2.2018/2020 Combined Integrated ReportThe 2018/2020 Integrated Report (IR) was approved by EPA in 2021. This IR contains the latest 303(d) list and TMDLs within the National Forest. The Draft 2022 Integrated Report will be sent to EPA for approval in January 2022.DWQ values its good working relationship with Forest Service managers and staff and looks forward to continued coordination and collaboration during finalization of the DEIS and implementation of projects and activities under the final plan. Please feel free to contact Jodi Gardberg, Manager, Watershed Protection Section, at jgardberg@utah.gov with any questions.ConclusionThe State appreciates the opportunity to provide comments and looks forward to continually working with the Forest Service to ensure the development of the Ashley National Forest land use plan revision has integrity and fulfills the multiple-use and sustained-yield mandate of public lands. Please direct any written correspondence to the Public Lands Policy Coordinating Office at the address below or call to discuss any questions or concerns.Sincerely,Redge B. Johnson Executive DirectorTechnical Comments The remainder of our comments focus on sections of the DEIS where corrections are needed, or additional statements should be added to the analysis or conclusions. Text shown in [BOLD FOLLOWING]bold[END BOLD],[BOLD AND UNDERLINE FOLLOWING]underlined type[END BOLD AND UNDERLINE] indicates text that should be added to the DEIS. Text in [BOLD FOLLOWING]bold type[END BOLD] indicates state suggestions for improvement of the DEIS or reasons for the edits suggested. Text that is overstruck should be removed from the DEIS. The state believes that these edits will better inform the decision maker of the implications of the various alternatives and lead to a better result. These comments are as follows and are listed by DEIS page number:PageS-1 The Forest Service has prepared this draft environmental impact statement ([BOLD AND UNDERLINE FOLLOWING]D[END BOLD AND UNDERLINE]EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and state laws and regulations.1 The Forest Service has prepared this [BOLD FOLLOWING]draft[END BOLD] environmental impact statement ([BOLD AND UNDERLINE FOLLOWING]D[END BOLD AND UNDERLINE]EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and state laws and regulations.2 Typical uses and activities include land- and water-based recreation (such as camping, hiking, boating, and all-terrain vehicle [ATV] [BOLD FOLLOWING]or off-highway vehicle [OHV][END BOLD] riding),2 Portions of the Forest are within the original Uintah and Ouray Indian Reservation. Local Native American tribes value the lands on the Ashley National Forest for hunting and gathering, ceremonial and traditional uses, and ancestral connections. [BOLD FOLLOWING]This text is repetitive of text appearing earlier on the page and should be deleted.[BOLD END]5 NEPA requires the Forest Service to coordinate planning with other Federal agencies that have jurisdiction by law or special expertise with respect to any environmental impact

involved in a proposal (see 40 CFR 1501.8+.[BOLD FOLLOWING]Should be (see 40 CFR 1501.8).[END BOLD]7 Chapter 1. Purpose of and Need for Action: [STRIKETHROUGH FOLLOWING]The[END STRIKETHROUGH] This chapter includes information on the history of the project proposal, the purpose of and need for the project, and the agency[rsquo]s proposal for achieving that purpose and need.7 This chapter summarizes the information used to compare alternatives [BOLD FOLLOWING]and[END BOLD] contains the detailed basis used to measure the potential environmental consequences of each alternative.11 [STRIKETHROUGH FOLLOWING]Issues[END STRIKETHROUGH] [BOLD FOLLOWING]Commenters[END BOLD] brought up the need to identify high-risk areas for wildfire and employ a variety of methods to treat fire.16 For livestock grazing, forage utilization and stubble height under alternative A would be determined based on site specific conditions to meet land health standards and based on individual AMPs and permit terms and conditions. [BOLD FOLLOWING]The acronym [ldquo]AMP[rdquo] should be included in the list of acronyms on Pages vii - viii of the DEIS.[END OF BOLD]18 Management under alternative B would also support the maintenance and improvement of resilient ecosystems and watersheds to support wildlife diversity; it would provide ecological conditions to maintain a viable population of each SCC [BOLD FOLLOWING]and common and abundant species[END BOLD] within the plan area [STRIKETHROUGH HERE]and common and abundant species.[END STRIKETHROUGH]18 Specifically for bighorn sheep, management has been included to limit authorization of new permitted domestic sheep or goat allotments unless separation from domestic sheep and goats can be demonstrated, or research [BOLD FOLLOWING]and consultation with state wildlife management agencies[END BOLD] indicates that the potential for pathogen transfer would be limited.19 Increased restrictions on resources uses, such as timber, would support ecosystem services associated with clean water,[STRIKETHROUGH FOLLOWING] including municipal water supplies[END STRIKETHROUGH]. [BOLD FOLLOWING]Restricting timber harvest may enhance water quality but would likely reduce the quantity of water produced by a watershed, which would negatively impact municipal water supplies.[END BOLD]19 In addition, when domestic [STRIKETHROUGH FOLLOWING]sheet[END STRIKETHROUGH] [BOLD FOLLOWING]sheep[END BOLD] or goat grazing permits are voluntarily waived without preference, and if the allotment does not provide separation from bighorn [STRIKETHROUGH FOLLOWING]sheet[END STRIKETHROUGH] [BOLD FOLLOWING]sheep[END BOLD], the allotments would be closed to provide separation between domestic sheep and goats and bighorn sheep.24 Table 2-2 and Pages 207, 210, 247, 249, 250, 251, 252: [BOLD FOLLOWING]The acronym [ldquo]HMs[rdquo] is not listed in the acronyms listed on Pages vii-viii of the DEIS.[END BOLD]25 Table 2-2, Alternative B: New domestic sheep or goat allotments would not be authorized unless separation from bighorn sheep can be demonstrated, or research demonstrates the risk of pathogen [BOLD AND UNDERLINE FOLLOWING]transfer[END BOLD AND UNDERLINE] can be avoided or is no longer an issue[hellip]31 [hellip] (particulate matter less than 10 microns in diameter [PM10] and particulate matter less than 2.5 microns in diameter [PM2.5]).[BOLD FOLLOWING] In the definition of acronyms on Page viii, the term [ldquo]micrometers[rdquo] is used rather than [ldquo]microns[rdquo] in defining particulate matter.[END BOLD]32 The State of Wyoming does not have predefined smoke management airsheds (Forest Service 2017b).[BOLD FOLLOWING] This text seems contrary to the text in Footnote #1 on this page.[END BOLD]32 [hellip]a 70-acre portion the Ashley National Forest north of Vernal is at the [STRIKETHROUGH FOLLOWING]northwest[END STRIKETHROUGH] [BOLD FOLLOWING]northeast[END BOLD] extreme of this nonattainment area boundary. [BOLD FOLLOWING]Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.[END BOLD]36 The Ashley National Forest is in conformance with each of the NAAQS, except for 70 acres that fall within the [STRIKETHROUGH FOLLOWING]northwest[END STRIKETHROUGH] [BOLD FOLLOWING]northeast[END BOLD] boundary of the Uintah Basin marginal ozone nonattainment area. [BOLD FOLLOWING]Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.[END BOLD]38 Emissions in the 70-acre portion of the Ashley National Forest that lies in the [STRIKETHROUGH FOLLOWING]northwest[END STRIKETHROUGH] [BOLD FOLLOWING]northeast[END BOLD] boundary of the Uintah Basin marginal ozone nonattainment area would be similar to those that currently occur. [BOLD FOLLOWING]Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.[END

BOLD]39 Under all alternatives, vegetation and fuels treatments would be used,[BOLD AND UNDERLINE FOLLOWING]in varying degrees[END BOLD AND UNDERLINE], to reduce tree density and the quantity of surface fuels and to remove insect- affected trees, which, in turn, lowers the risk of severe wildfire. [BOLD FOLLOWING]Alternative C would rely more on natural processes than active vegetation management.[END BOLD]45 Erosion is also a disturbance that often occurs secondarily [BOLD FOLLOWING]because of[END BOLD] changes to the soil surface.48 Soil quality in these areas can be expected to be maintained or altered depending on the management of recreation and livestock grazing impacts. [BOLD FOLLOWING] Fire and fuels management (or the lack thereof) also has a significant impact on soil quality in special designation areas. Focusing solely on recreation and grazing impacts could be interpreted as being bias against those activities. [END BOLD]51 Under Alternative B, two [BOLD AND UNDERLINE FOLLOWING]additional[END OF BOLD AND UNDERLINE] areas covering 10,300 acres would be managed as wilderness with 230 acres identified as potential wetlands.45 Erosion is also a disturbance that often occurs secondarily [BOLD FOLLOWING]because of[END OF BOLD] changes to the soil surface.48 Soil quality in these areas can be expected to be maintained or altered depending on the management of recreation and livestock grazing impacts. [BOLD FOLLOWING]Fire and fuels management (or the lack thereof) also has a significant impact on soil quality in special designation areas. Focusing solely on recreation and grazing impacts could be interpreted as being bias against those activities.[END BOLD] 51 Under Alternative B, two [BOLD AND UNDERLINE FOLLOWING]additional[END BOLD AND UNDERLINE] areas covering 10,300 acres would be managed as wilderness with 230 acres identified as potential wetlands.53 This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height [STRIKETHROUGH FOLLOWING]exceeds[END STRIKETHROUGH] [BOLD FOLLOWING]exceeding[END BOLD] 4 inches [BOLD AND UNDERLINE FOLLOWING]is rare.[END BOLD AND UNDERLINE]60 Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory from livestock and wild ungulates, fire suppression, roads, and motorized recreation. [BOLD FOLLOWING]Non-motorized recreation can also affect stream dynamics and hydrology, such as non-motorized trail improvements near streams. Failure to list that stressor could be interpreted as showing bias for non-motorized recreation and against motorized recreation.[END BOLD]60 At higher elevations in the Uinta Mountains, these include a glacial lake, potholes, kettle ponds, and beaver ponds. [BOLD FOLLOWING]There is only one glacial lake? Page 64 indicates there are many.[END BOLD]61 Harmful algal blooms have been observed periodically in the upper reaches of Flaming Gorge Reservoir [STRIKETHROUGH FOLLOWING]on[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]in[END BOLD AND UNDERLINE] or near the plan area.61 The area includes a portion of the Ashley National Forest encompassing the Duchesne-Roosevelt Ranger District and portions of the Vernal Ranger District within the Whiterocks River drainage that is within the original treaty boundary of the Uintah and Ouray Ute Indian Reservation (Indian Country). [BOLD FOLLOWING]Please provide a map of what is considered [ldquo]Indian Country[rdquo] by the EPA.[END BOLD]62 There are 14 pipelines that traverse parts of the Ashley National Forest, three of which are used for electricity generation.[BOLD FOLLOWING]Moon Lake Electric is decommissioning the electricity generation facilities in the Yellowstone Canyon and Uinta Canyon areas, so the associated pipelines will be removed. For more information, contact Pat Corun, Moon Lake Electric, 435-722-5400[END BOLD]63 Several municipalities extend their protection areas onto the Ashley National Forest, including the following municipalities in Utah: City of Green River, Duchesne, Whiterocks, Tridell, Vernal, Manila, and Dutch John. [BOLD FOLLOWING]City of Green River, Utah, or Wyoming?[END BOLD]63 The Ashley National Forest also possesses three subbasin claims, with plans to file for additional claims. The Ashley National Forest holds three subbasin claims; [hellip] [BOLD FOLLOWINGNote repetition.[END BOLD]64 Most vegetation is dominated by herbaceous species, especially [BOLD AND UNDERLINE FOLLOWING]in[END BOLD AND UNDERLINE] the [STRIKETHROUGH FOLLOWING]in[END STRIKETHROUGH] northern areas of the FGNRA, with high acreage of irrigation-influenced riparian and wetland areas.66 Conifers are encroaching across elevations on the Uinta Mountains, with 500 acres observed during vegetation mapping (Forest Service GIS 2020). Conifer encroachment is common for the mid- to low elevations and is likely attributed to fire suppression. [BOLD FOLLOWING] 500 acres observed versus [ldquo]common at mid to low elevations[rdquo] seems inconsistent. Is the 500 acres just at high elevations?[END BOLD]70 Allotment level assessments conducted over the past decade have identified specific locations where past livestock [BOLD AND UNDERLINE

FOLLOWING]grazing[END BOLD AND UNDERLINE] may be a factor that has contributed to water quality impacts (see for example, Goodrich and Huber 2015).72 These protective plan components would reduce impacts on water quality from surface disturbance, recreation, and motorized and nonmotorized users [BOLD AND UNDERLINE FOLLOWING]but may prohibit certain restoration projects that could benefit water quality in the long term.[END BOLD AND UNDERLINE]72 This raises the possibility of increased sedimentation, higher water temperatures, and shifts in flood severity or frequency, essentially destabilizing watersheds, [BOLD AND UNDERLINE FOLLOWING]when compared to Alternatives B and D.[END BOLD AND UNDERLINE]72 The threat of uncharacteristic wildfire would continue and be the highest of all alternatives, [BOLD AND UNDERLINE FOLLOWING]except for Alternative C, which would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment.[END BOLD AND UNDERLINE]74 The threat of uncharacteristic wildfires would continue and would be the highest under all alternatives [BOLD AND UNDERLINE FOLLOWING](except for Alternative C)[END BOLD AND UNDERLINE]; the overall watershed condition would be at risk from uncharacteristic wildfires with the potential to reduce overall WCF scores. [BOLD FOLLOWING]Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire.[END BOLD]76 Recommended wilderness areas include extra protection for riparian and wetland vegetation, including restrictions on surface disturbance, development, and access that would preserve riparian and wetland vegetation and structure in these areas; however, restrictions on restoration [BOLD AND UNDERLINE FOLLOWING]and fuels management[END BOLD AND UNDERLINE] in recommended wilderness could affect the Forest Service[rsquo]s ability to improve [BOLD AND UNDERLINE FOLLOWING]and protect[END BOLD AND UNDERLINE] these riparians, wetlands, and possibly fen communities.77 Alternative B would include plan components that restrict equipment refueling, maintenance, and storage of fuels and other materials in riparian management zones, locating timber roads and infrastructure outside of riparian management zones, and avoiding riparian management zones when [STRIKETHROUGH FOLLLOWING]construction[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]constructing[END BOLD AND UNDERLINE] roads and trails with some exceptions.78 Alternative B would use mechanical treatments and prescribed fire to treat ERUs and move them toward desired conditions. [BOLD FOLLOWING]ERUs is not in the list of acronyms on pages vii and viii.[END BOLD]79 Impacts on water quality would be reduced, compared with alternative A, from reductions in surface disturbance, restrictions on motorized travel, and a reduction in the concentration of recreation users. [BOLD AND UNDERLINE FOLLOWING]However, areas with special designations rely more on natural processes rather than active fuels management and restoration projects, which can lead to increased risk of uncharacteristic wildfire and resultant negative impacts on water quality from [ldquo]flood after fire[rdquo] events.[END BOLD AND UNDERLINE]80 Alternative C would reduce disturbance from such activities as recreation and mechanical treatments, compared with alternative A; however, additional constraints on restoration treatments could also affect the effectiveness of restoration. [BOLD AND UNDERLINE FOLLOWING]Alternative C would rely more on natural processes, which could leave riparian vegetation at greater risk for uncharacteristic wildfire.[END BOLD AND UNDERLINE]82 Improper grazing, such as intensive grazing in riparian, wetland, and fen communities may change the vegetation composition by reducing highly palatable plant species while increasing less palatable plant species, including nonnative and invasive plant species; reduce vegetation cover; diminish plant species richness; and reduce the hydrological function related to the quality and quantity of riparian and green line vegetation. Desired condition plan components common to all action alternatives for riparian areas, livestock grazing, and soil should minimize the potential for adverse impacts related to livestock grazing. [BOLD FOLLOWING]This statement implies that flexible grazing management could lead to improper grazing, which would not be the case if forest service range managers are doing an effective job of managing allotments.[END BOLD]83 Beyond the Ashley National Forest boundary, past, present, and future actions by other entities, as well as activities associated with rural residential communities, [BOLD AND UNDERLINE FOLLOWING]impact watersheds and aquatic and riparian ecosystems.[END BOLD AND UNDERLINE]89 Together, these coniferous vegetation types cover about 53 percent of Ashley National Forest lands, with mixed conifer and [STRIKETHROUGH FOLLOWING]Engelmann spruce[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]Lodgepole pine[END BOLD AND UNDERLINE] comprising the largest

amounts. [BOLD FOLLOWING]Table 3-14 indicates more acreage of Lodgepole pine than Engelmann spruce.[END BOLD]93 The most recognized and understood driver of aspen communities is fire. [BOLD FOLLOWING]This sentence occurs twice in the top half of this page (above and below the 3 bullet points).[END BOLD]93 In persistent aspen stands, [STRIKETHROUGH FOLLOWING]Increased[END STRIKETHROUGH] [BOLD FOLLOWING]increased[END BOLD] fire frequency would likely reduce the number of older, declining aspen stands and perhaps improve clone vigor and health with more frequent cohort turnover.93 Due to the limited number of acres of aspen on the Anthro Plateau landtype association, aspen is more susceptible to elk browsing [BOLD AND UNDERLINE FOLLOWING]there[END BOLD AND FOLLOWING] than [BOLD AND UNDERLINE FOLLOWING]in[END BOLD AND UNDERLINE] other aspen-bearing landtype associations.95 Livestock [STRIKETHROUGH FOLLOWING]have grazed[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLLOWING]grazing[END BOLD AND UNDERLINE] has occurred in various forms and intensities for more than 100 years.111 Table 3-18: [BOLD FOLLOWING]Mixed conifer, under Alternative B should be 29,000; not 29,00.[END BOLD]115 [BOLD AND UNDERLINE FOLLOWING]Prescribed fires[END BOLD AND UNDERLINE] [STRIKETHROUGH FOLLOWING]Fires[END STRIKETHROUGH] would be mostly low to mixed severity to reduce conifer competition and maintain or improve ponderosa pine composition and structure where burning occurs.122 Every fire with a resource objective or that escapes initial attack must have a decision in [BOLD AND UNDERLINE FOLLOWING]the[END BOLD AND UNDERLINE] wildfire decision support system.127 Table 3-27: [BOLD FOLLOWING] Please explain to the reader how a flame length can be less than 0 feet. Perhaps it would be better to use [ldquo]unburnable[rdquo] as in Table 3-28?[END BOLD]131 However, with a greater proportion of managed wildland fire, there would be an increased risk of the unintended outcome/consequence that a fire could escape; this could lead to larger wildfires, habitat and watershed damage, and recreation closures. Depending on the extent of such fires, impacts may persist over the long term. [BOLD AND UNDERLINE FOLLOWING]In addition, Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire. Management direction under Alternative C relies on natural processes, which removes many tools otherwise available to reduce the risk of uncharacteristic wildfire.[END OF BOLD AND UNDERLINE]135 The Intermountain Region report indicates between 2005 and 2013, total forest ecosystem carbon in the region increased from 1,069 Tg (teragrams) to 1,084 Tg, [BOLD FOLLOWING](This information is presented in both paragraphs one and two on this page).[END BOLD]147-148 Management concerns related to this species include habitat impacts from invasive plant species, climate change, oil and gas development, predation, and livestock grazing (Forest Service 2017a). [BOLD FOLLOWING]Wildfire, whether natural or human-caused, should be considered as one of the major impacts on greater sage grouse habitat.[END BOLD]153-154 [BOLD FOLLOWING]The analysis assumptions need to address predation of these species, which is one of the major stressors.[END BOLD]160 This is because designated areas would not receive active natural resource management, and the Forest Service would be unable to [STRIKETHROUGH FOLLOWING]purse[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]pursue[END OF BOLD AND UNDERLINE] activities such as habitat restoration and enhancement.165 The area of bighorn sheep CHHR that encompasses timbered stands is not typical bighorn sheep habitat (typically open, alpine areas); however, timber harvest within these atypical areas of CHHR may benefit bighorn sheep by facilitating migration through the timber stands as bighorn sheep move between summer and winter ranges. [BOLD FOLLOWING]The acronym CHHR (Core Herd Home Range) is not listed on Page vii along with other acronyms used in the DEIS.[END BOLD]167 It should be noted, however, that some of the potential impacts [STRIKETHROUGH FOLLOWING]form[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]from[END BOLD AND UNDERLINE] recreational use may be partially offset by opportunities for long term habitat improvements in destination and general recreation MAs, which would allow for initiation of habitat improvement projects.171 Included are 9,000 acres of general Rocky Mountain bighorn sheep habitat, 17,500 acres of Rocky Mountain bighorn sheep CHHR, 3,000 acres of greater sage-grouse habitat, 9,100 acres of lynx [BOLD AND UNDERLINE FOLLOWING]peripheral[END BOLD AND UNDERLINE] habitat, [hellip]173 Because fewer acres of Rocky Mountain bighorn sheep, lynx, and fringed myotis habitat would be suitable for timber production relative to Alternative A, these species would experience reduced impacts from tree removal. The benefit to at-risk species, whose habitat is threatened by conifer encroachment (Rocky

Mountain bighorn sheep), from fewer acres of habitat suitable for timber production, would be less relative to alternative B. [BOLD FOLLOWING]These two sentences seem to contradict[hellip]Rocky Mountain Bighorn Sheep suffer negative impacts from tree removal but positive impacts from removal of encroaching conifers.[END BOLD]173 All species may benefit from movement of habitat towards desired conditions in areas where vegetation treatments occur, and to a greater extent [STRIKETHROUGH FOLLOWING]that[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]than[END BOLD AND UNDERLINE] Alternative A.176 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. [BOLD FOLLOWING]With forage utilization and stubble height determined based on land health standards, this should not translate to reduced habitat features provided that USFS range managers are accurately assessing land/range health.[END BOLD]176 This is because overall recreation would be higher intensity with more facilities, roads, and other disturbances. (delete the second of two periods)179 Table 3-44 and associated text: [BOLD FOLLOWING]Is 2020 U.S. Census data available to update this data?[END BOLD]180 Table 3-45 and associated text: [BOLD FOLLOWING]Is 2020 U.S. Census data available to update this data?[END BOLD]180 Table 3-46 and associated text: [BOLD FOLLOWING]Updated employment data for counties in Utah should be available from agencies such as the Utah Department of Workforce Services.[END BOLD]181 Table 3-47 and associated text: [BOLD FOLLOWING]Updated employment data for counties in Utah should be available from agencies such as the Utah Department of Workforce Services.[END BOLD]182 Table 3-48 and associated text: [BOLD FOLLOWING]Updated average earnings and per capita income data should be available.[END BOLD]182 Table 3-49 and associated text: [BOLD FOLLOWING]Updated unemployment data is available from the Utah Department of Workforce Services for counties in Utah.[END BOLD]183 Table 3-50 and associated text: The Ashley National Forest[rsquo]s annual budget (including expenditures and salaries and excluding fire expenditures) was approximately $15.5 million in fiscal year 2017. Approximately 60 percent of the budget was spent on salaries in fiscal year 2017. [BOLD FOLLOWING]Updated expenditure data should be available for federal fiscal year 2021.[END BOLD]184 Table 3-51 and associated text. [BOLD FOLLOWING]PILT and SRS data for 2020 and 2021 should now be available.[END BOLD]184 Footnote to Table 3-51: *Portion of total PILT attributable to National Forest System acres. Additional payments to the analysis area are made as a result of other Federal land management ownership (for example, the BLM).184 The SRSCS, reauthorized in March 2018, was enacted in part to address this decline by stabilizing payments to counties dependent on revenues from Federal timber sales. [BOLD FOLLOWING]The SRSCS program has been authorized again after March 2018.[END BOLD]188 In a 2008 survey of public land uses in Utah (Krannich 2008), 76 percent of respondents from [STRIKETHROUGH FOLLOWING]Dagget[END STRIKETHROUGH], [BOLD AND UNDERLINE FOLLOWING]Daggett[END BOLD AND UNDERLINE], Duchesne and Uinta Counties rated development of energy resources as [ldquo]very important[rdquo] for the quality of life of people living in their communities.189 and elsewhere: 2008 Beliefs and Values study (Russell 2008) [BOLD FOLLOWING]The 2008 Krannich study was based on responses from residents in the Daggett, Duchesne and Uintah County area. Where were the respondents from in the Russell study? If those respondents were not from the proximity of the Ashley National Forest, that may explain how the mindset of the Russell respondents differ considerably from that of the Krannich respondents.[END BOLD]189 Key tribal resources and relevant habitat types are identified in table 3-53, in [ldquo]Areas of Tribal Importance.[rdquo] [BOLD FOLLOWING]Table 3-53 is entitled [ldquo]Minority and Low-Income Populations within the Socioeconomic Plan Area (2018)[rdquo]. Areas of Tribal Importance don[rsquo]t seem to be included in this table.[END BOLD] 197 There are numerous commercial fuelwood operations and five sawmills that process timber in the economic analysis area, as detailed in [ldquo]Timber.[rdquo] [BOLD FOLLOWING]Page 186 states that there are seven local sawmills rather than five.[END BOLD]199 Table 3-57. Recreation Experiences Matrix [BOLD FOLLOWING]The following recreation usage should be recognized in the DEIS:Families use Destination Recreation Areas (see Tables 3-60, 3-61 & 3-62), General Recreation Areas, Trails with Mechanized Access, and Trails withMotorized Access.Large Groups use Trails with Mechanized Access and Trails with Motorized Access.Hunters use Remote areas with low use.Anglers use Destination Recreation Areas, Backcountry Recreation Areas and Developed Recreation sites.Mountain Bikers use

Destination Recreation Areas and Backcountry Recreation Areas (see Tables 3-60, 3-61 & 3-62)OHV users use Developed Recreation sites and Backcountry RecreationAreas where there are existing motorized routes (see Tables 3-60, 3-61 & 3-62).Cultural and Historic Site visitors use Trails with Mechanized Access and Trails with Motorized Access to reach these sites.Environmental Justice populations also use Trails with Motorized Access.[END BOLD]202 Overall, oil and natural gas prices have dropped significantly since much higher levels seen earlier this decade. [BOLD FOLLOWING]This statement needs to be updated to reflect the recent rebound in energy prices from the historic lows in 2020 due to travel and gathering restrictions associated with the COVID 19 pandemic.[END BOLD]203 Under all alternatives, grazing on National Forest Service lands will continue to represent only minor contributions to the ability of the traditional use to continue in the area, particularly for cattle grazing. [BOLD FOLLOWING]This statement seems to conflict with a statement on Page 247, which reads: [ldquo]Although typical operators depend only partially on public lands to sustain their livestock, forage sources on Federal lands still represent a critical part of grazing operations.[rdquo] The state and counties in the planning area feel that the statement on Page 247 is accurate and the statement on Page 203 is not.[END BOLD]204 The lack of quantitative objectives for vegetation treatments under alternative A, [BOLD FOLLOWING]and the limitations on vegetation treatments under alternative C[END BOLD] however, would limit the ability to achieve forest-wide changes.207 This would limit any impacts on environmental justice, [BOLD FOLLOWING]elderly and mobility disabled[END BOLD] communities related to their ability to use preferred recreation sites; it also would minimize constraints on time and costs to travel to recreation.210 Additional recommended wilderness areas could result in site-specific impacts on the access for recreation and the type of recreational uses available, which may disproportionately affect environmental justice, [BOLD FOLLOWING]elderly, and mobility disabled[END BOLD] communities in terms of costs for access.211 [STRIKETHROUGH FOLLOWING]Users[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]User[END BOLD AND UNDERLINE] groups who prioritize developed recreation sites and motorized use may have decreased satisfaction under this alternative, while those who prioritize solitude, and a backcountry experience may have enhanced experiences.213 Under alternative C, however, an emphasis on passive vegetation management [STRIKETHROUGH FOLLOWING]may[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]would[END BOLD AND UNDERLINE] be less effective in trending vegetation types toward the natural range of variation and improving carbon storage capabilities and ecosystem resilience to climate change at large scales, compared with alternative B.213 This would result in an additional potential for site-specific impacts on ability to access recreation areas (in terms of [BOLD FOLLOWING]time and[END BOLD] costs for access).213 Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with Alternative A [BOLD FOLLOWING]however, to a lesser degree than alternative B, due to the restrictions on active vegetation management.[END BOLD]213 Under alternative C, reduced mechanical treatments and reliance on natural processes would reduce short-term impacts from treatment [BOLD FOLLOWING]but provide reduced long-term benefits on ecosystems when compared to alternative B.[END BOLD]213 Exposure pathways[mdash]Impacts under alternative C would be similar to those described under alternative B. Due to a reliance on natural processes, short-term impacts from use of prescribed fire would be reduced compared with other action alternatives; however, emissions would occur from use of managed wildland fires. [BOLD FOLLOWING]Under alternative C, the risk of uncharacteristic wildfire and associated health impacts from emissions would be greater than under alternative B due to the restrictions on active vegetation management in alternative C.[END BOLD]215 Under alternative D, increased mechanical treatments and [BOLD AND UNDERLINE FOLLOWING]less[END BOLD AND UNDERLINE] reliance on natural processes would increase short-term impacts from treatment.215 This would limit impacts on access for environmental justice, [BOLD FOLLOWING]elderly, and mobility disabled[END BOLD] communities.230 Table 3-66: [BOLD FOLLOWING]The table should have a footnote indicating that the Ashley National Forest is in the process of decommissioning and disposing of the Indian Canyon and Stockmore Ranger Stations, which are national register listed properties.[END BOLD]234 Surface-disturbing activities are associated with economic uses of the Ashley National Forest [BOLD FOLLOWING]and may lead to the discovery of previously unknown cultural resources.[END BOLD] [BOLD AND UNDERLINE FOLLOWING]However[END BOLD AND UNDERLINE], [STRIKETHROUGH FOLLOWING]Cultural[END STRIKETHROUGH] [BOLD FOLLOWING]cultural[END BOLD] resources can be directly affected [BOLD AND UNDERLINE

FOLLOWING]during surface disturbance[END BOLD AND UNDERLINE] by the modification, displacement, and loss of artifacts, features, and middens, resulting in the loss of valuable cultural resource information on the site function, date of use, subsistence, past environments, and other research questions.235 This [STRIKETHROUGH FOLLOWING]would[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]may[END BOLD AND UNDERLINE] lead to the potential overuse in some areas.236 Vegetation management treatments (such as timber harvest, planned ignitions, thinning, and planting) on 1,500 acres would be targeted annually (1,200 acres annually in the second decade) for resource objectives. This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).237 Vegetation management treatments (such as timber harvest, planned ignitions, thinning, and planting) on 1,000 acres annually in the first decade and 800 acres annually in the second decade would be targeted for resource objectives. [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years).[END BOLD]238 While the Forest Service would employ other vegetation treatments, there would be an emphasis on timber harvest and production with 1,600 acres annually in the first decade and 1,300 acres annually in subsequent years. [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).[END BOLD]240 Under the 2012 Planning Rule, identification of lands that are suited and not suited for timber production is required on national forests, based on legal withdraw[BOLD AND UNDERLINE FOLLOWING]al[END BOLD AND UNDERLINE], site-specific conditions, and the compatibility of lands with the desired conditions and objectives found within the plan components.241 The lack of natural fire [BOLD AND UNDERLINE FOLLOWING]and the implementation of passive forest management policies[END BOLD AND UNDERLINE] over a century has led to timber stands that are increasingly dense with older trees, and thus more susceptible to insects and disease. Historical fire suppression [BOLD AND UNDERLINE FOLLOWING]and passive forest management[END OF BOLD AND UNDERLINE] has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife.242 The combination of fire suppression, [BOLD AND UNDERLINE FOLLLOWNG]passive forest management[END BOLD AND UNDERLINE] and insect infestation has also resulted in stand conditions that are potentially more susceptible to high- intensity wildfires.245 When compared with alternative A, alternative [STRIKETHROUGH FOLLOWING]B[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]C[END BOLD AND UNDERLINE] would use modern fire-planning tools to determine high-risk areas, which may offer some protection to timber stands suitable for production and harvest.249 Factors affecting livestock operations and range management on the Ashley National Forest are largely based on market demand for livestock and rangeland conditions, both of which are based primarily on forage availability. [BOLD FOLLOWING]The market demand for livestock is based on consumer preference rather than forage availability.[END BOLD]251 Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage [BOLD AND UNDERLINE FOLLOWING]in the short-term, until precipitation or winds remove the dust.[END OF BOLD AND UNDERLINE]253 Fire and fuels management would continue to follow direction outlined in the [STRIKETHROUGH FOLLOWING]proposed[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]existing[END BOLD AND UNDERLINE] plan, though it would not use modern prediction and planning tools to determine high-risk areas.254 Treatments on 1,500 acres of the Ashley National Forest annually (1,200 acres in the second decade) would affect grazing operations through changes in grazing systems; however, these types of management are generally planned around grazing rotations to minimize impacts on grazing operations. [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).[END BOLD]255 These is a small [STRIKETHROUGH FOLLOWING]potnteial[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]potential[END BOLD AND UNDERLINE] for the need for closures of additional acres in pastures where cattle could not be effectively restricted, resulting in additional loss of HMs. These [STRIKETHROUGH FOLLOWING]impactes[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]impacts[END BOLD AND UNDERLINE] would be determined at the site-[STRIKETHROUGH FOLLOWING]specifc[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]specific[END BOLD AND UNDERLINE] level during [STRIKETHROUGH

FOLLOWING]implantation[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]implementation.[END BOLD AND UNDERLINE]255 Treatments on 1,000 acres of the Ashley National Forest on an average annual basis (800 acres on an average annual basis in the second decade), [hellip] [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years).[END BOLD]256 Treatments on 1,600 acres of the Ashley National Forest annually (1,300 acres in the second decade) would affect grazing operations through changes in grazing systems; [hellip] [BOLD FOLLOWING]This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).[END BOLD]263-264 An act of Congress is not a reasonably foreseeable action, so environmental consequences on leasable and locatable minerals are expected to be the same as under alternative A. [BOLD FOLLOWING] Even though it cannot be predicted whether Congress will officially designate additional wilderness areas under alternatives B and C, even if these areas are left for a long period of time as recommended wilderness or wilderness study areas, management will preclude any land use that would impact wilderness characteristics. Thus, the environmental consequences for leasable and locatable minerals will be different than under alternative A.[END BOLD]268 Many roadways outside the Ashley National Forest boundaries pass through tribal or BLM lands and provide the only means of access to the national forest; roads accessing the Duchesne Ranger District, for instance, are on tribal lands. [BOLD FOLLOWING]It may be good to note here or elsewhere in the plan that roads crossing tribal lands to access the forest (such as the Rock Creek Road, the Moon Lake Road and the Uinta Canyon Highway) are in very poor condition and that the USFS supports efforts to obtain Federal Land Access Program (FLAP) grants or other funding to improve these access routes.[END BOLD]269 Alternatives are currently being explored for the Old Stockmore Ranger Station, which is located on land not connected to the national forest. [BOLD FOLLOWING]This sentence should be updated as the Ashley National Forest Supervisor recently announced that this facility will be conveyed to the GAO which will then convey it to the Ute Indian Tribe (see https://ubmedia.biz/news/41037/ranger-station-land-going-back-to-ute-indian-tribe/.[END BOLD]271 National direction for Forest Service management actions would continue to affect how infrastructure and facilities are managed across the national forest. Under all alternatives under consideration in this EIS, variable infrastructure and facilities budgets would affect maintenance and further infrastructure development. National direction will also continue to provide forests with guidance in the management of facilities and infrastructure on Forest Service lands. [BOLD FOLLOWING] The first and third sentences above appear to be repetitive.[END BOLD]273 They would accrue from the provision of more dispersed camping docks, mountain bike-designated use, improvements to dispersed camping sites and access roads, OHV loop [STRIKETHROUGH FOLLOWING]tails[END STRIKETHORUGH] [BOLD AND UNDERLINE FOLLOWING]trails[END BOLD AND UNDERLINE], and other recreational facilities.274 Roughly 11 miles of the route will be in the [BOLD AND UNDERLINE FOLLOWING]South Unit of the Duchesne[END OF BOLD AND UNDERLINE] - Roosevelt Ranger District.274 The Round Park Hardened Stream Crossing Project [BOLD AND UNDERLINE FOLLOWING]would provide[END BOLD AND UNDERLINE] hardened ford structures at two stream crossings in the Round Park area.274 The Ashley National Forest offers a variety of developed and dispersed recreational activities, such as camping and picnicking, hiking, mountain biking, horseback riding, wildlife and scenic viewing, hunting and fishing, [STRIKETHROUGH FOLLOWING]enjoying snow sports[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]OHV riding[END BOLD AND UNDERLINE], and rock climbing. Wintertime activities are snowshoeing, cross-country skiing, ice fishing, and snowmobiling. [BOLD FOLLOWING] There is no need to mention [ldquo]enjoying snow sports[rdquo] in the first sentence when the second sentence lists a variety of wintertime (snow) activities.[END BOLD]285 Compared with alternative A, alternative B acres vary only slightly, with a slight increase in motorized ROS classes (ROS roaded and ROS semi-[STRIKETHROUGH FOLLOWING]primtive[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]primitive[END BOLD AND UNDERLINE] [STRIKETHROUGH FOLLOWING]motirozed[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]motorized[END BOLD AND UNDERLINE]) and a shift of some acres from [STRIKETHROUGH FOLLOWING]semiprimtive[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]semiprimitive[END BOLD AND UNDERLINE] [STRIKETHROUGH FOLLOWING]nonmotirzed[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]nonmotorized[END BOLD AND UNDERLINE] to primitive ROS class. Compared with alternative A,

this may provide enhanced opportunities for motorized users as well as those looking for less developed, primitive non-motorized recreation experiences. [STRIKETHROUGH FOLLOWING]Altnerative[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]Alternative[END BOLD AND UNDERLINE] B would also include objectives to increase and improve both motorized and [STRIKETHROUGH FOLLOWING]nonmtorized[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]nonmotorized[END BOLD AND UNDERLINE] routes, improving recreation [STRIKETHROUGH FOLLOWING]opprotuntes[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]opportunities[END BOLD AND UNDERLINE] for these users.286 Vegetation management under Alternative B would include annual treatment targets that would result in [STRIKETHROUGH FOLLOWING]changes to sort[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]short[END BOLD AND UNDERLINE] and long-term changes to vegetation structure and related recreational settings.287 It aims to treat 1,000 acres [BOLD AND UNDERLINE FOLLOWING]annually[END BOLD AND UNDERLINE] in the first decade and 800 acres [BOLD AND UNDERLINE FOLLOWING]annually[END BOLD AND UNDERLINE] in the second decade of vegetation management.288 Alternative D aims to treat 1,600 acres [BOLD AND UNDERLINE FOLLOWING]annually[END BOLD AND UNDERLINE] in the first decade and 1,300 acres annually in the second decade of vegetation management.291 The two scenic byways on the Ashley National Forest decision area are the Dinosaur Diamond Scenic Byway (11.8 miles in the decision area) and Flaming Gorge-Uintas Scenic Byway (53.6 miles in the decision area) (Forest Service GIS 2020). Also, the Red Cloud Loop Scenic Backway is 36.2 miles in the decision area, and the Sheep Creek Scenic Backway is 11.4 miles in the decision area. [BOLD FOLLOWING]The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at: https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.[END BOLD]292 Managing for natural-appearing scenery is important to the public. [BOLD FOLLOWING]This blanket statement may not be accurate. There are certain areas of the forest where natural- appearing scenery is important, but other areas, such as in the current Partial Retention or Modification VQO areas, where modifications of scenery would likely be acceptable to the public.[END BOLD]298 The Forest Service would annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternatives A [BOLD AND UNDERLINE FOLLOWING]and C[END BOLD AND UNDERLINE].299 Within the Ashley National Forest[rsquo]s boundaries, landownership (containing surface and subsurface) includes public lands managed by the Forest Service, private inholdings, and Utah State lands and [BOLD FOLLOWING] subsurface mineral resources owned by ??????.[END BOLD]299-300 Land status is determined by legal regulations, restrictions, and permissions on how the land is used or managed for use, including planning, zoning, easements, and other legal designations. [BOLD FOLLOWING]County zoning ordinances and zoning maps do not apply to USFS lands, but they do to inholdings.[END BOLD]300 Under the land adjustment programs, the Forest Service acquires and consolidates key tracts of non-Federal land to conserve valuable natural habitat, reduce the risk of permanent development in sensitive areas, and enhance public recreation opportunities. [BOLD FOLLOWING]The plan should also state that, under the land adjustment programs, the Forest Service may dispose of lands no longer needed to meet Forest Service objectives.[END BOLD]304 Land Withdrawals and Conveyances. This section may be a good place to recognize that certain lands in the Ashley National Forest have been withdrawn from Forest Service management due to the presence of Central Utah Water Project (Bureau of Reclamation) facilities.304 Central Utah Water Project, Bureau of Reclamation. [BOLD FOLLOWING]It would be helpful to know here the acreage of land withdrawn for this purpose and how this impacts forest management. A map should be provided to show the locations of these CUP-BOR withdrawal areas.[END BOLD]307 Under alternative C, one new 1,400-acre RNA and 50,200 acres of new wilderness areas would be designated. Additionally, under this alternative, new ROWs would be considered unsuitable within the RNAs, and the recommended wilderness areas would include 48,600 acres of IRAs. This would decrease the amount of access and land available for special-use authorizations, by 113,000 acres, when compared with alternative A. [BOLD FOLLOWING]How was the total of 113,000 acres calculated?[END

BOLD]313 Of the four eligible segments evaluated in the suitability study, none were determined to be suitable for inclusion in the National Wild and Scenic River System in the preliminary suitability determination. [BOLD FOLLOWING]Then why are they being proposed for designation under alternative C?[END BOLD]314 [hellip]scenic backways on the Ashley National Forest are the Red Cloud Loop Scenic Backway and Sheep Creek Scenic Backway. [BOLD FOLLOWING] The State of Utah has designated the Reservation Ridge Scenic Backway running from US-191 at the Avintaquin Campground turnoff on the Dinosaur Diamond Prehistoric Highway National Scenic Byway, west along the ridge line to US-6, just east of Soldier Summit, within the south unit of the Duchesne-Roosevelt Ranger District. Other state-designated backways (some of which cross the Ashley National Forest) can be found at: https://rules.utah.gov/publicat/bulletin/2011/20110715/34954.htm.[END BOLD] 314 Red Cloud Loop Scenic Backway[mdash]This backway can be accessed from Highway [STRIKETHROUGH FOLLOWING]131[END STRIKETHROUGH] [BOLD AND UNDERLINE FOLLOWING]191[END BOLD AND UNDERLINE] in the Vernal area or at its junction with the Flaming Gorge-Uintas National Scenic Byway, located 15 miles north of Vernal.316 Under all alternatives, there would be no changes to the FGNRA, scenic byway miles, national recreation trails, geologic areas, or wilderness areas. These areas would continue to be managed according to the enabling legislation for which they were designated. [BOLD FOLLOWING]How can this be true when alternatives B and C would establish additional potential wilderness areas that would be managed to protect those wilderness characteristics?[END BOLD]317 No acres [BOLD AND UNDERLINE FOLLOWING]within the four recommended wilderness areas[END BOLD AND UNDERLINE] would be found suitable for timber harvest to maintain the option for future designation.See attachment for table: Utah Department of Agriculture food and Technical CommentsReferences Bureau of Land Management. 2005. Implementation of the University of Idaho[rsquo]s Stubble Height Review Team recommendations and upcoming training. From K. Lynn Bennett to District Managers. Boise ID, USA: [ldquo]Bureau of Land Management EMS Instruction Memorandum No. ID2005-074. 3 p.Burkhardt, J.W. 1997. Grazing utilization limits: an ineffective management tool. Rangelands 19 (3 June): p.8-9.Cleary, C.R., S. Anderson, D. Henderson, and J. McLain. 2008. The quandary over short- term indicators. Rangelands Aug 2008: p. 37-39.Oregon State Univ. 1998. Stubble height and utilization measurements: uses and misuses. Oregon State Univ. Exp. Sta. Bull 682. (72 p)Sharp, L. K. Sanders and N. Rimbey. 1994. Management decisions based on utilization [ndash] is it really management? Rangelands 16 (1 Feb): 38-40.Stubble Height Review Team. 2006. Using stubble height to monitor riparian vegetation. Rangelands Feb 2006: p. 23-28.University of Idaho Stubble Height Review Team. 2004. University of Idaho stubble height study report. Moscow, ID, USA: Univ. Idaho Forest, Wildlife & Range Exp. Sta. Contribution No. 986. 26 p.USDA Forest Service. 2005a. Implementation of the University of Idaho[rsquo]s Stubble Height Review Team recommendations and upcoming training. File Code: From Jack Troyer to Region 4 Forest Supervisors. Ogden, UT, USA: USDA Forest Service. 2p.USDA Forest Service. 2005b. Implementation of the principles of obtaining and interpreting utilization data on southwest rangelands. File Code: 2210. From Harv Forsgren to Region 3 Forest Supervisors. Albuquerque, NM, USA: USDA Forest Service. 2 p.