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Comments: Please see attached file. Thank you!

February 17th, 2022Susan Eickhoff, Forest SupervisorAshley National Forest355 North Vernal Ave.Vernal, UT 84078Re: Comments - Ashley National Forest Plan Revision Draft EISComments submitted electronically online using the Comment and Response ApplicationDear Plan Revision Team,My name is Chad Hamblin. I am submitting comments on my own behalf as a concerned citizen. These comments have the official endorsement of Yellowstone to Uinta Connection, so I am also submitting the comments on that organization[rsquo]s behalf.About meI am a fifth-generation resident of the Uintah Basin. I live just south of the Uinta Mountains, and I have spent, and continue to spend, a great deal of time recreating in wild areas of the Ashley National Forest [ndash] both in the Uinta Mountains and in the south unit of the national forest (Indian Canyon, etc.). I am thus very familiar with the areas that were evaluated for potential wilderness designation as part of the Forest Plan Revision process.About Yellowstone to Uinta ConnectionYellowstone to Uinta Connection (Y2U) is a 501c3 public interest organization whose staff and members have and will continue to work to protect the integrity of habitat for fish and wildlife as well as recreate in this region. We are concerned about the loss of integrity of the Regionally Significant Wildlife Corridor (Corridor) that connects the Greater Yellowstone Ecosystem and Northern Rockies to the Uinta Wilderness and Southern Rockies. The Yellowstone to Uinta Connection organization was given this name to bring attention to this Corridor and we use this name in reference to both the organization and Corridor as it provides context and public awareness to the location and its importance. Yellowstone to Uinta Connection is headquartered in Paris, Idaho with a satellite office in Bondurant, Wyoming.1. IntroductionMy comments here are exclusively about Ashley NF[rsquo]s wilderness evaluation and recommendations. I am also deeply concerned about all of the other issues addressed in the DEIS. For all of those other issues - logging, ATVs, grazing, fire, etc. - I fully support the comments submitted by Yellowstone to Uinta Connection, and I am officially signed onto that organization[rsquo]s comments as a concerned citizen.I was happy to know that the wild lands I know and care so much about were being evaluated as potential additions to the national wilderness reservation system. However, as I pointed out in the comments that I submitted on November 8, 2019, I was disappointed to see how fundamentally flawed and inadequate that evaluation was. I saw that some truly wild areas were not evaluated at all, and that many of the areas that were evaluated were given strange boundaries that, from my knowledge of those areas, don[rsquo]t make sense. I still wonder why there were so many flaws and omissions in the evaluation.When the Ashley National Forest made its Draft Environmental Impact Statement (DEIS) Available to the public a few months ago, and I saw the wilderness aspects of the plan revision, I was even more disappointed. I truly feel that this whole wilderness evaluation process has been a poor use of Forest Service Employee time, a poor use of taxpayer money, and most importantly a wasted opportunity to protect a vast amount of truly wild lands in need of protection as designated wilderness.My responses to various parts of the DEIS follow.2. Response to Summary of Areas Excluded in Alternatives by Wilderness Inventory Areas, found in Appendix G Recommended Wilderness Analysis ProcessI find it difficult to respond to the Ashley National Forest[rsquo]s reasons for not recommending areas for wilderness designation, because there is a lack of any specific information as to why any of the areas evaluated were not recommended. On page 155, where Alternative B is discussed, it merely says [ldquo]The remaining acres that were with the wilderness inventory and not selected to be included under this alternative were determined to have either conflicting uses that did not reflect the balance of multiple use the forest was striving for in this alternative and/or did not possess sufficient wilderness characteristics.[rdquo] For Alternative C it says almost the same thing: [ldquo]The remaining acres that were within the wilderness inventory area and inventoried roadless areas and not selected to be included under this alternative were determined to not be responsive to the input received in scoping and have either conflicting uses that do not reflect the balance of multiple use the forest was striving for in this alternativeand/or did not possess sufficient wilderness characteristics.[rdquo] I would like to know specifically

what the conflicting uses are for each area evaluated, and I would like to know specifically why each rejected area was deemed to [ldquo]not possess sufficient wilderness characteristics.[rdquo]The rationales given in the Summary of Areas Excluded in Alternatives by Wilderness Inventory Areas (starting on pg. 161 of Appendix G, Recommended Wilderness Analysis Process) are so vague and repetitive that they don[rsquo]t really shed any additional light on why areas weren[rsquo]t considered for wilderness.It seems to me that rather than saying, [ldquo]This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas[rdquo] for Alternative B for each area it would have been simpler to have made this vague, and to me quite meaningless, statement just once and noted that it applied to all units.Likewise, posting the statement, [ldquo]Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics,[rdquo] for Alternative C for each area evaluated seems unnecessary. Furthermore, that statement gives the false impression that wilderness is being proposed for all the areas when it[rsquo]s actually only being recommended for three of the twenty-eight areas. For those twenty-five areas with no wilderness proposed what would be truthful would be to say, [ldquo]Rejects comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics.[rdquo]In those three areas where some acreage is being proposed for wilderness, only a relatively small part of what qualifies as wilderness is actually being proposed for designation - so even in those areas I don[rsquo]t feel there is an adequate response to comments asking for additional recommended wilderness (it certainly isn[rsquo]t an adequate response to what I asked for).Another thing found in the Rationale section for each evaluated area is a bullet point with a statement about the number of [ldquo]Forest Service system roads cherry stemmed out of the area.[rdquo] Since cherry-stemming roads is allowed and has been done in the creation of many wilderness areas I don[rsquo]t see why this should be given prominence in the document. During a visit to the Dark Canyon Wilderness Area in southeastern Utah I saw that there is a road cherry-stemmed deep into the Wilderness. That cherry-stem is arguably more intrusive than any of the cherry-stemmed routes in the areas evaluated on the Ashley, but it didn[rsquo]t prevent the area from being designated and appreciated as a wilderness area.Also listed with a bullet point in the Rationale section for some areas is a grazing-related comment such as [ldquo]Multiple range improvements within the area.[rdquo] The University of Montana[rsquo]s Wilderness Connect website states that [ldquo]Where previously established, commercial grazing (i.e. cattle, sheep, etc. within permitted grazing allotments) may continue in wilderness, where it was occurring prior to designation. Permittees may be allowed to maintain range improvements, such as fences and watering facilities, that are necessary to the livestock operation or for protection of the range.[rdquo] Thus, range improvements are not a legitimate reason for excluding an area from wilderness recommendation.A few other bullet-pointed general categories were listed for some areas in the Summary of Areas Excluded in Alternatives by Wilderness Inventory Areas, and I will comment on some of them in my 3. Comments about a number of specific areas that were evaluated section of this document.3. Response to Step 2: Evaluation, found in Appendix G Recommended Wilderness Analysis ProcessI take issue with some things I see in the Step 2: Evaluation part of Appendix G, Recommended Wilderness Analysis Process. One issue is that for each area there is a note about what the local county government[rsquo]s opinion is for management of the area. Under the heading Question 4a: How can the area be managed to preserve its wilderness character?There is the question Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics? And then for each area an Outcome is listed stating the local county[rsquo]s opposition to wilderness designation. For example, for each area in the county I live in, Duchesne County, the statement is [ldquo]An objective in the 2017 Duchesne County resource management plan states [lsquo]Avoid designation of additional areas within the county as federally designated wilderness[rsquo].[rdquo]I would like to point out that an objective stated by a county commission doesn[rsquo]t qualify as a state or federal law and thus is irrelevant to the stated question. The public land managed by the Forest Service is national public land and belongs to all Americans. The county has no more authority in how that land is managed than the Forest Service has authority over how a county library is managed. The Forest Service can offer advice to the county if they[rsquo]d like to, but the county is under no obligation to follow that advice, and the reverse is also true.The first Measure listed for Question 4a: How can the area be managed to preserve

its wilderness character? is Describe the shape and configuration of the area, and it for most of the areas that were evaluated part of the stated Outcome is a comment about the area having an irregular shape. My response to that is, [ldquo]could you possibly expect a wild area to naturally have anything but an irregular shape?[rdquo] I can[rsquo]t imagine a wild area being a perfect circle or square. I only know of one wilderness area with a regular shape [ndash] the Mountain Lakes Wilderness in Oregon, which is square-shaped; and I[rsquo]ve read that its boundaries could, and should, be expanded to give it a more natural and manageable shape. I certainly hope the planning team didn[rsquo]t look at areas unfavorably for having irregular shapes. (Since so little information is given about why areas were excluded from recommendation, I find myself guessing at possible reasons - including the shapes of the areas.)Some of the areas that were evaluated certainly did have very strange shapes, but that was by choice and not by necessity. The weird bubble-like exclusions from some areas make no sense to me and were not explained or justified by the plan revision team.I also hope the team didn[rsquo]t look unfavorably at areas for having a [ldquo]blocky[rdquo] shape (for example the Big Ridge area).4. Research Natural Areas (RNAs)On November 8, 2019 a number of conservation organizations, including Grand Canyon Trust, submitted comments on the forest plan revision. In those comments was a proposal to consider recommending four specific areas for RNA designation as part of the Forest Planning process. The forest Service made no written response to those comments until earlier this month, after being asked about them in an email from Mike Popejoy to Forest Planner Anastasia Allen.Ms. Allen responded with an explanation of why the areas were not considered candidates for RNA designation, and Mr. Popejoy summarized his understanding of her response as follows: [ldquo]They basically said there's nothing special about the Audry Lake drainage; Big Brush Creek drainage is already represented by Ashley Gorge RNA; Sims Peak Potholes North is already represented by Sims Peak Potholes (even though we proposed an expansion); and South Fork Rock Creek Fen has a history of grazing.[rdquo] Having read Ms. Allen[rsquo]s comments I feel that Mr. Popejoy[rsquo]s summary of them is accurate.Among the things Ms. Allen said in her response to Mr. Popejoy was the following: [ldquo]We considered the existing RNAs on the forest, with their distinguishing features, and determined not to add additional areas with similar qualities. Also, most of the Ashley National Forest is grazed by livestock, which greatly limits RNA considerations across the forest due to objectives 3 and 6. All existing RNAs on the forest do not have or severely limit livestock grazing within or adjacent to them. Other anthropogenic activities are either non- existent or severely limited within current Forest RNAs.[rdquo]Because I[rsquo]ve spent time in most of the areas in question, Mr. Popejoy asked for my opinion about this. My response to him was as follows:[ldquo]Stacy says the Audrey Lake drainage [lsquo]represents thousands of acres throughout the Uinta Mountains.[rsquo] To me that comment doesn't fit well with her other comment that [lsquo]most of the forest is grazed by livestock.[rsquo] I still think Audrey Lake stands out as a place that appears to have never, ever been grazed by livestock. It looks significantly different to me than anywhere else I've been on the Ashley. If there is an RNA that represents a drainage of that type that isn't grazed she didn't name it in her response to you. I'm willing to say with almost 100% certainty that neither Stacy nor any other current Ashley employee has ever been to the Audrey Lake Drainage. It's extremely difficult to get to (thus the absence of grazing). Also, I would still like an explanation from the Ashley as to why they specifically excluded the lake and surrounding areas from their wilderness evaluation.I'm also willing to say with a high degree of certainty that Stacy and the other FS employees haven't been to the bottom of Big Brush Creek Gorge. Few people go there. I'm not as familiar with Ashley Gorge, but the parts I have seen were not exactly the same as Big Brush Creek Gorge.I don't know much about the fens, but I do hope they fence them to eliminate grazing.It seems stingy and unscientific to me to only allow one RNA per habitat type. No two areas are going to be exactly the same, and it seems like it would be nice to have multiple RNAs of each habitat type for comparison purposes.[rdquo]I will say more here of my thoughts about RNAs and the Ashley NF revision team[rsquo]s approach to them. First, I do take issue with the idea that there should only be one of each habitat represented. As a high school science teacher I know the importance of replication in experiments. According to a Yale University website, [ldquo]Replication reduces variability in experimental results, increasing their significance and the confidence level with which a researcher can draw conclusions about an experimental factor.[rdquo] I think observing and studying an RNA is like a science experiment, and having more than one RNA of a habitat type is basically a replication of the experiment.As I stated in my comments to Mr. Popejoy, no two areas are the same - and I would think researches would want to study differences, however subtle they may be, in two or more outwardly similar areas.

I would think this would be even more important when you consider unforeseen natural or human impacts that could potentially occur in one area but perhaps not the other(s). For example, if one RNA is impacted by fire it would be important to see how it compares to a similar RNA that isn[rsquo]t impacted by fire [ndash] and both areas could [ldquo]Serve as baseline areas for measuring long-term ecological changes[rdquo](#6 of Forest Service Manual 4063.02) when compared with non-RNA areas. Objective #1 of Forest Service Manual 4063.02 doesn[rsquo]t say there should only be one RNA of each habitat type, and I think it[rsquo]s unfortunate the Ashley NF Revision Team chose to approach it that way.Ms. Allen stated that [ldquo]The fens did not qualify because of their long history associated with livestock grazing, with addition of timber harvesting and/or recreation use.[rdquo] Objective #3 of Forest Service Manual 4063.02 says, [ldquo]Protect against human-caused environmental disruptions.[rdquo] I don[rsquo]t think that should be read to mean an RNA has to be a place that has never been impacted by humans, but rather I think it would mean that an RNA is a place where measures should be taken to protect against human-caused disruptions. It[rsquo]s the place, not the causes of the disruptions to it, that should be protected. The Fens, not the grazing and timber harvesting that are disrupting them, should be protected. Why not fence livestock out of the fens and make the areas around them off-limits to timber harvest?In supplemental comments submitted later to go with their original comments, the Grand Canyon Trust and other conservation organizations recommended that lands in the areas they had proposed for RNA status be evaluated for wilderness designation. I think those areas should be reevaluated and reconsidered for both RNA and wilderness designation.5. Conservation organization recommendationsI agree with the wilderness recommendations made in comments submitted jointly by the Grand Canyon Trust, Wilderness Society, and other conservation organizations in earlier stages of the Ashley NF plan revision process. I will quote them at times in my comments here, and I will simply refer to those organizations as GCTE (Grand Canyon Trust, etc.).See map- GCTE's recommended wilderness units, shown in light green The wilderness inventory polygon boundaries for areas evaluated in the South Ashley (Right Fork Indian Canyon, etc.) didn[rsquo]t have the omissions and irregularities seen in the areas evaluated in the Uinta Mountains, and because of that GCTE didn[rsquo]t submit maps or boundary change descriptions for those areas. I feel that the areas in the south unit of the Ashley are also deserving of wilderness designation, and I feel it is inappropriate for the revision team to have completely excluded that part of the forest from its wilderness recommendations.6. Comments about a number of specific areas that were evaluatedFollowing are my comments about some (not all) of the inventory areas that I feel should be designated as wilderness areas.Alkali Canyon Wilderness Inventory AreaThis is one of my favorite areas of the Ashley National Forest. I hike in this area in the summer and cross-country ski there in the winter. I think of it as an amazing and underappreciated part of the Ashley National Forest. I[rsquo]ve observed pinyon jays in the area, and I[rsquo]ve seen tracks of elk, bobcat, and mountain lion, and other species. Higher elevation areas provide important Greater Sage Grouse habitat. The area is also home to pronghorn. This area would add important pinyon-juniper habitat to the lands preserved as wilderness in the Ashley National Forest. The area provides unique experiences much different than what a person can experience in the Uinta Mountains.I feel this area should be designated as wilderness.See image- A nameless Canyon in the Alkali Canyon Wilderness INventory Area (note person in lower right corner for perspecitve) Copyright Chad HamblinBig Ridge Wilderness Inventory AreaI[rsquo]ve hiked in this area and I feel it should be designated as wilderness, using GCTE[rsquo]s boundaries.Carter Creek Wilderness Inventory AreaIn GCT[rsquo]s comments they stated, [ldquo]Because of its rugged, deep canyon, dense riparian vegetation, abundance of cultural sites, and outstanding beauty, Carter Creek is a gem of Flaming Gorge country and satisfies the criteria in the Chapter 70 directives, making the area suitable for inclusion on the National Wilderness Preservation System.[rdquo]My response to the Ashley[rsquo]s rationale for not recommending this area:Seven Forest Service system roads cherry stemmed out of the area: In the GCT[rsquo]s recommendations only one road (rather than the review team[rsquo]s seven) intrudes into the area and needs to be cherry stemmed, and due to the area[rsquo]s ruggedness the surrounding wild areas are not impacted much by that road. I find myself wondering why the revision team chose to include so many cherry-stems in their boundaries.Past vegetation treatments: The vegetation treatments are old, and from my experiences cross-country skiing and hiking in the area I[rsquo]d say they are substantially unnoticeable.Private inholding within the area: Private inholdings could easily be excluded from the area, and I have to wonder why the plan revision team chose to include them in the first place.GCTE[rsquo]s recommended boundaries exclude those private lands.Adjacent to State Highway 44 and

the Red Canyon corridor: Many wilderness areas are adjacent to highways, so why should that be an issue here? Wilderness would help preserve the scenic beauty of the Red Canyon corridor, so the presence of the corridor should not be a reason to exclude the area but rather should be a reason to recommend the area as wilderness.I feel this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. Private lands are easily excluded and only one cherry-stem is included. Note the light-colored circular and straight-line shapes showing the odd boundaries given to the unit in the Ashley NF[rsquo]s evaluation (land within NF[rsquo]s evaluation boundaries is marked with dots).See [attachment for] image- Looking down Carter Creek Canyon from the west boundary of the unit. [copy] Chad HamblinCottonwood Wilderness Inventory AreaThis area provides a scenic backdrop for people traveling through Indian Canyon. I[rsquo]ve hiked and cross-country skied in the area and I think it should be designated wilderness.Cow Hollow Wilderness Inventory AreaGCTE listed the following highlights for this area:- Contains Ashley Gorge, Black Canyon, and Sims Peak, all outstanding landscape features.- Ashley Gorge is an extremely rugged and steep forested canyon that provides outstanding opportunities for solitude and which contains a 10-mile section of Ashley Creek that supports outstanding wildlife, historic, and geological values.- Black Canyon Creek was found eligible for inclusion in the Federal Wild & Scenic Rivers System because of its outstandingly remarkable wildlife, scenic and geologic/hydrologic values.- Contains multiple historic sites that have been found eligible for the National Register of Historic Places.- The Sims Peak [ndash] Potholes and Ashley Gorge Research Natural Areas are within the unit[rsquo]s borders.- Over 93% of the unit is inventoried roadless areas.The Ashley NF[rsquo]s evaluation boundaries for this area make no sense to me. Large areas of Black Canyon and Ashley Gorge were inexplicably left out of the polygon of evaluated land. I have spent time in various parts of this area and can[rsquo]t see why key parts were left out. I would really like someone to explain the logic of that to me. The DEIS states that [ldquo]The inventory area is very irregularly shaped. The inventory area boundaries are primarily not tied to geographic locations and are difficult to distinguish between areas not included in the inventory.[rdquo] It was completely unnecessary and inappropriate to give this area those boundaries. The GCTE[rsquo]s recommended boundaries protect a large chunk of wild land in a solid, intact unit of wild country. Their boundaries would protect 25,878 acres.Of all of the wilderness inventory areas on the Ashley I feel this is one of the most deserving and in need of protection as wilderness. I think it[rsquo]s shameful that the Ashley NF revision team didn[rsquo]t recommend any acres of wilderness for this unit.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. Note the light-colored lines showing the odd boundaries given to the unit in the Ashley NF[rsquo]s evaluation (land within NF[rsquo]s evaluation boundaries is marked with dots).See [attachment for] image- Ashley Gorge looking south. Essentially everything on the right side of the photo was inexplicably left out of the evaluated polygon. [copy] Tim PetersonFlat Top Mountain Wilderness Inventory AreaSee my comments for North Slope East Uintas Wilderness Inventory Area/ South Slope East Uintas Wilderness Inventory Area.Goslin Wilderness Inventory AreaI[rsquo]ve enjoyed hiking in the wild area, and I think it should be designated as wilderness.See image- Rocky landscape about a half a mile east of Dripping Spring, left out of the FS[rsquo]s evaluation. [copy] Chad HamblinIndian Spring Wilderness Inventory Area, Mill Hollow Wilderness Inventory AreaI feel both of these areas should be re-considered for wilderness recommendation because they include headwaters of Avintaquin Creek, which contains a population of Colorado River Cutthroat trout.Lake Fork Mtn Wilderness Inventory AreaI enjoy visiting this area near Moon Lake, and I think it should be designated as wilderness.See [attachment for] image- View of the unit, looking southwest from a boat on Moon Lake. Much of the area next to the shore was left out of the FS[rsquo]s evaluation. [copy] Chad HamblinMt Lena Wilderness Inventory AreaThis area was doomed to fail the recommendation process because it is split into three pieces by two ATV trails. GCTE wisely avoided the problem by separating the area into a northern unit, north of the trails, and a southern unit, south of the trails (I[rsquo]m curious why the revision team didn[rsquo]t do the same). Each of the resulting units is plenty large and wild to qualify as a wilderness area [ndash] and they would each add their own unit things to the wilderness system.GCTE called the 13,800-acre north unit Speirs Peak, and here[rsquo]s some of what they said about it: [ldquo]The Speirs Peak unit offers solitude in a diversity of settings including the dense forests of its higher elevations, and the deeply incised canyons of Cart and Pipe Creek. Outstanding opportunities for primitive and unconfined recreation include outstanding hunting opportunities among the dense north-facing timber and broad meadows, as well as horseback riding, skiing, snowshoeing, camping and fishing opportunities.[rdquo]I[rsquo]ve enjoyed hiking in the

area and I highly recommend it for wilderness.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. (land within NF[rsquo]s evaluation boundaries is marked with dots). Note the upper part of the Mount Lena unit at the bottom of the image.See [attachment for] image- Most of Cart Creek was left out of the FS evaluation, including this part. [copy] Chad HamblinFor the 10,048-acre southern unit GCTE kept the Mount Lena name. Here[rsquo]s that they said about this unit: [ldquo]Outstanding opportunities for solitude are easily found within the Mount Lena unit. The high forested peaks, and long forested ridges provide adequate screening and shelter from outside sights and sounds and other human activity within the unit. Anybody who ventures to the summit of Mount Lena, or into the headwater basin of Pothole Creek will have no difficulty in finding solitude. Outstanding opportunities for primitive and unconfined recreation in the unit include exceptional backcountry hunting opportunities, excellent and rewarding hiking to the summits of Limber Flag or Mount Lena, and backcountry skiing and snowshoeing opportunities as exhibited by the presence of Limber Flag yurt, which is located just outside and adjacent to the proposed recommended wilderness unit. These opportunities are enhanced by the easy access provided by FS roads and trails that line the boundaries of the unit on all sides.[rdquo]I[rsquo]ve done a lot of cross-country skiing in this unit during trips to the Limber Flag Yurt, and I highly recommend the area for wilderness designation.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. (land within NF[rsquo]s evaluation boundaries is marked with dots). Note the lower part of the Speirs Peak unit in the upper left of the image.See [attachment for] image- Craggy terrain in the vicinity of Limber Flag Peak. [copy] Chad HamblinNorth Slope East Uintas Wilderness Inventory Area/ South Slope East Uintas Wilderness Inventory AreaCCTE recommends this as one large wilderness area [ndash] which they call East Uintas High Country, combining the Ashely NF[rsquo]s Flat Top Mountain, South Slope East Uintas, and North Slope East Uintas units. The area is 219,551 acres in size. Here[rsquo]s what the GCTE said about this area in their comments:- 219,551 acres (combines the FS[rsquo]s Flat Top Mountain, South Slope East Uintas, and North Slope East Uintas units).- Largest tract of unprotected contiguous, unroaded and undeveloped FS lands remaining in the Ashley National Forest.- Includes outstanding landscape features like mountain peaks (Marsh Peak, Leidy Peak, and Paradise Peak), Whiterocks Cave, cirque basins, and lakes.- Contains multiple historic sites that have been found eligible for the National Register of Historic Places.- Contains the Pollen Lake Research Natural Area and Uinta Shale Creek Research Natural Area.- Home to populations of Colorado River Cutthroat trout, Oncorhynchus Clarkii Pleuriticus, a subspecies that is included on the Utah Sensitive Species List.- Over 94% of the unit is inventoried roadless area.The GCTE boundaries include some wild country that was incorrectly left of the Ashley NF[rsquo]s evaluation [ndash] including the west side of Uinta Canyon. I spend a lot of time in that area and can vouch for its wildness.The GCTE recommendation includes important low-elevation habitat not represented in the High Uintas Wilderness.I feel this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. It can be seen that wildlife corridors between the High Uintas Wilderness and lower elevation lands are protected.See [attachment for] image- The west side of Uinta Canyon, which contains thousands of acres of wild land that were left out of the Forest Service[rsquo]s evaluation. [copy] Chad HamblinNutter[rsquo]s Canyon Wilderness Inventory AreaI think this area should be given some kind of extra protection [ndash] wilderness or some other designation [ndash] to protect the archaeological resources of the area.Pole Creek Wilderness Inventory AreaI spend a lot of time hiking, camping, fishing in this area and I also enjoy visiting Pole Creek Cave. The cave features of the area are something that gives this area increased importance for protection. I highly recommend the area be designated as wilderness [ndash] using the boundaries suggested by GCTE.See [attachment for] image- A visitor explores Pole Creek Cave, one of the outstanding features of the unit. [copy] Chad HamblinRight Fork Indian Canyon Wilderness Inventory AreaAt over 46,000 acres this is the third largest area evaluated for wilderness on the Ashley NF (only the South Slope East Uintas area and the North Slope East Uintas areas are larger), and I think it would make a great wilderness area and should be recommended for wilderness designation.Other than the vague [ldquo]balanced this with other multiple uses[rdquo] statement made for all areas (as I mentioned earlier) the only things listed in the rationale are cherry-stemmed roads and range improvements [ndash] both of which (as I explained earlier) are allowed in wilderness and shouldn[rsquo]t be a reasons to exclude this area.I hike and cross-country ski in this area, and one of the things I enjoy seeing in the area is the fascinating, beautiful bristlecone pines. According to researchers at Brigham Young University there are at least fifteen stands of Great Basin bristlecone pines in the area (you can see their map here). Yet for some reason there is no mention of the

species anywhere in the DEIS[rsquo] Appendix G Recommended Wilderness Analysis Process. Bristlecones are also not mentioned for the Cottonwood Inventory Area or the Wire Fence Inventory area [ndash] both of which also have stands of them, as shown on BYU[rsquo]s map. (The description of the Wire Fence area does state that there is [ldquo]less than 1% 5-needle Pine[rdquo] but doesn[rsquo]t elaborate on what species they may be referring to, so it could be limber pine or bristlecone pine.)I must ask, were bristlecone pines purposely omitted from the lists and descriptions of vegetation for these areas, or was this a result of negligence or ignorance on the part of the revision team? I would hope the Ashley[rsquo]s employees are aware of this species in these areas. Are they overlooked because they are not considered economically important? I hope their ecological importance is recognized. About a year ago I wrote an article about Great Basin Bristlecone Pines for the Utah Native Plant Society[rsquo]s bulletin. You can see it here. I think the occurrence of bristlecone pines in the area is one of many reasons the Right Fork Indian Canyon Inventory Area should be designated wilderness.See [attachment for] image- Bristlecone pines in the Right Fork Indian Canyon Inventory area. [copy] Chad HamblinSheep Creek East Wilderness Inventory AreaI enjoy visiting this wild, rugged area and I strongly feel it should be designated as wilderness.Sheep Creek West Wilderness Inventory AreaHere is some of what GCTE said about this area:- A wildlife corridor for animals moving between parts of the Ashley National Forest, and animals moving between the Bridger Teton National Forest and the Ashley National Forest.- Contains the Sheep Creek Canyon Geologic Area.- Contains the Sheep Creek Cave and Sheep Creek Spring, both outstanding landscape features.- Contains multiple historic sites that have been found eligible for the National Register of Historic Places.- Protects three watersheds functioning at risk.- 97% of the unit is inventoried roadless area.I strongly feel this area should be designated as wilderness.See [attachment for] image- Sheep Creek and adjacent wild country, seen from the east side of the unit. [copy] Chad HamblinSouth Fork Rock Creek Wilderness Inventory Area/ Dry Ridge Wilderness Inventory AreaGCTE[rsquo]s recommended combining the FS[rsquo]s South Fork Rock Creek and Dry Ridge inventory areas since they are connected by wild country that meets the requirements to be considered for wilderness. The Ashley NF inexplicably left out wild lands to the north of, and to either side of, upper Stillwater reservoir and on both sides of Rock Creek Canyon below the reservoir. The FS also left out a big zig-zaggy chunk of land that includes Audrey Lake and extends to the southeast. I[rsquo]ve hiked in that wild, remote area and have seen no reason for that land to have been excluded from the inventory. I would really Like to know why it was excluded.Here is some of what GCTE said about their recommended area:- 32,078 acres (combines FS South Fork Rock Creek and Dry Ridge units).- Combined unit corrects faulty boundary delineation between FS South Fork Rock Creek and Dry Ridge units; units should be combined to meet criteria for boundary delineation detailed in Chapter 70.- The unit is contiguous with the High Uintas Wilderness along its northern boundary and is not separated from the Wilderness by any human impact or other qualifying boundary feature; as such it can be said that the South Fork Rock Creek unit contains many of the same wilderness characteristics as those found and managed for in the High Uintas Wilderness.- The unit is a wildlife corridor for animals moving between the Uinta Wasatch Cache National Forest to the west and the Ashley National Forest.- Contains multiple historic sites that have been found eligible for the National Register of Historic Places.- Includes several watersheds that are functioning at risk. - Over 97% of the unit is inventoried roadless areas.I feel this area should definitely be designated as wilderness, using GCTE[rsquo]s boundaries.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. Note the light-colored lines showing the strange boundaries given to the South Fork Rock Creek and Dry ridge units in the Ashley NF[rsquo]s evaluation [ndash] which GCTE combined into one unit. (Land within NF[rsquo]s evaluation boundaries is marked with dots.) I would really like an explanation of how and why the NF[rsquo]s boundaries were chosen.See [attachment for] image- Wild country between Bear Lake and Audry Lake that was inexplicably left out of the FS[rsquo]s evaluation. [copy] Chad HamblinTimber Canyon East Wilderness Inventory Area, Timber Canyon West Wilderness Inventory AreaThese areas provide important wildlife habitat and I think they should be reconsidered for wilderness designation.Wagon Road Ridge Wilderness Inventory AreaGCTE made the following comments about this area, which they call Wagon Wheel:- Wildlife corridor for animals moving between the Ashley and Uinta-Wasatch-Cache and corridor for animals moving between the High Uintas Wilderness to the north and winter range to the south (including the Tabby Mountain Wildlife Management Area).- Contains the Castle Rocks, an outstanding landscape feature.- 98% of the unit is inventoried roadless.This is an area where the Ashley NF[rsquo]s evaluation area boundaries make no sense whatsoever to

me. Those boundaries had this wild area split in to two areas separated by a large unnecessary gap, and those Ashley NF areas have roads going right through the middle of them. GCTE[rsquo]s boundaries here are the only boundaries that make sense to me. I[rsquo]ve hiked in various parts of this area, including the parts left out of the Ashley NF[rsquo]s evaluation, and I can attest to the wildness of the entire area recommended by GCTE.I feel this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. Note the light-colored lines showing the bizarre boundaries given to the unit in the Ashley NF[rsquo]s evaluation (land within NF[rsquo]s evaluation boundaries is marked with dots). As with other areas I would really like an explanation of how and why the NF[rsquo]s boundaries were chosen.See [attachment for] image- A series of waterfalls in Swift Creek. This part of Swift creek was left out of the FS[rsquo]s evaluation, and the part of the creek that was evaluated by the FS, further upstream, contains a much smaller amount of water. [copy] Chad HamblinWire Fence Wilderness Inventory AreaI hike and cross-country ski in this wild area, and one of the things I enjoy most about the area is the impressive ice flows that form each winter at a particular pour-off. I feel that this area would make a great addition to the wilderness preservation system.See [attachment for] image- These ice flows never cease to amaze me. [copy] Chad Hamblin7. Comments about wilderness-quality areas that weren[rsquo]t evaluatedIn their comments submitted earlier in this process GCTE proposed the addition of seven wilderness areas that weren[rsquo]t evaluated for wilderness by the Ashley NF. At least some of those areas were evaluated previously in the 2006 Evaluation of Undeveloped Areas For Potential Wilderness Draft Information Packet. Information about three of those areas is included here.Big Brush CreekFrom earlier GCTE comments: The Ashley National Forest included this area in its 2006 Evaluation of Undeveloped Areas For Potential Wilderness Draft Information Packet. In the time since that evaluation, the area has retained its wild, natural condition and we feel it should be included in this current inventory. If anything, the wildness of the area has increased since 2006, as personnel from the Ashley National Forest have done a great job of closing and blocking vehicle routes in accordance with the current forest travel plan. The area contains almost 7,000 acres of rugged wildland that provides valuable habitat for plants and wildlife, and provides opportunities for solitude and primitive recreation for human visitors.This is one of my favorite places, and I feel very strongly that this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended Big Brush Creek wilderness unit.See [attachment for] image- Looking northwest in Big Brush Gorge, from a point near the southeast corner of the unit. [copy] Chad HamblinLightning RidgeFrom earlier GCTE comments: The Ashley National Forest included this area in its 2006 Evaluation of Undeveloped Areas For Potential Wilderness Draft Information Packet. In the time since that evaluation the area has retained its pristine condition and we feel it should be included in this current inventory. The area contains over 6,000 acres of rugged wildland that provides valuable habitat for wildlife, and provides opportunities for solitude and primitive recreation for human visitors.I feel this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended Lightning Ridge wilderness unit.See [attachment for] image- View to the south on top of Lightning Ridge. [copy] Chad HamblinRed CanyonHere is what GCTE said about this area:- 6,347 acres.- 96% of the unit is Inventoried Roadless Area.- Contains one of Utah[rsquo]s most popular day use river trips in a highly scenic, relatively pristine canyon of the Green River.- Home to the region[rsquo]s best tailwater trout fishery whose preservation and health is vital to sustaining the local economy.- Agreement was reached in 2014 to protect a stretch of the Green River in this unit as Wild and Scenic in the Rep. Rob Bishop Public Lands Initiative.I enjoy visiting this area and feel is should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended Red Canyon wilderness unit.See [attachment for] image- Boating the Green River in the Red Canyon proposed wilderness. Photo [copy] Tim Peterson8. Comments about the areas where wilderness is recommendedThe Flat Top Mountain, Goose Egg Peak, East Uintas, and Queant Lake areas are all recommended for wilderness designation in the DEIS, and I think each of those areas should be protected as wilderness. However, I don[rsquo]t think those areas should be looked at separately. There is wilderness-quality land connecting all of those areas and I think they should all be considered together with the lands between them and the lands adjacent to them, as shown in the maps of the areas recommended by GCTE.Out of the hundreds of thousands of acres of lands that qualify for wilderness designation I feel it is unacceptable that such a paltry amount of land is being recommended as wilderness, and I feel this either shows a lack of understanding and appreciation on the part of the revision team, or a lack of courage.9. The need for more wilderness, especially in lower elevation areasElevationI think it is important to note that the additional acres that are being recommended

for wilderness designation are high-country lands similar to what is already protected in the High Uintas Wilderness Area. While I think it[rsquo]s great to add more high-elevation lands to the High Uintas Wilderness, I think it is much more important to add lower elevation lands [ndash] ecoregions with habitat types that are currently lacking in wilderness protection. For example, ponderosa pine forests and aspen forests are two habitat types that I think are very much lacking in protection and should be added to the wilderness preservation system as much as possible. These habitat-types, along with sagebrush habitat, pinion juniper habitat, and other habitat types would benefit from [ldquo]Low Uintas[rdquo] and South Ashley wilderness area designations.Much of what would be added in the Ashley National Forest[rsquo]s recommended additions would be above timberline in the Bollies [ndash] an example of the [ldquo]rock and ice wilderness[rdquo] that already has more relative representation than so many other habitat types in the wilderness preservation system.See [attachment for] image- Lower elevation habitat in GCTE[rsquo]s recommended East Uintas High Country Wilderness Area. Only the most distant part of this photo was evaluated by the FS. [copy] Chad HamblinWildlife and PlantsDeer, elk, and many other species migrate between high-country habitat and low-country habitat. It doesn[rsquo]t do them much good to have protected lands in the high country if they lose the low elevation winter habitat that they also depend on for their survival. And there are also all of the full-time lower elevation species of plants and animals that need protection just as much as the high-country speciesSee [attachment for] image- A mule deer fawn resting in the relatively low-elevation Pole Creek Evaluation area. [copy] Chad HamblinAccessibility and RecreationThe high Uintas Wilderness is more difficult to access than the lower elevation wilderness- quality lands in the summer, and it is extremely difficult to access in the winter via the non- motorized means of skies or snowshoes. There are many accessible wild areas in the Ashley that are great for cross-country skiing and snowshoeing that currently qualify as wilderness, but none of them are designated as wilderness or recommended in the DEIS as wilderness - and they are threatened with the possibility of losing their wilderness character. I[rsquo]ve only once ever cross-country skied in the High Uintas Wilderness and it was brutally difficult and not something I plan on ever doing again (unless of course the boundaries are changed to include more accessible places). On the other hand I have cross- country skied a lot in areas that would be protected through designation of lower-elevation lands.Even in the summer I seldom visit the High Uintas Wilderness, because I prefer to recreate in the lower areas that are currently unprotected and at risk of losing their wilderness character. The wilderness character of those areas is specifically why I enjoy them.See [attachment for] image- My cross-country ski tracks in the Mt. Lena area - winter recreation in a beautiful, and accessible, wild landscape. [copy] Chad Hamblin10. ConclusionI feel that, considering the ever-worsening climate crisis afflicting the world and considering the role natural forests play in countering the causes of the crisis through their absorption and sequestering of carbon, it is now more important than ever to permanently protect areas through designation as wilderness. The wild lands of the Ashley are now more important than ever as habitat for the vegetation and wildlife that depends on them. I can[rsquo]t think of any [ldquo]existing conflicting uses[rdquo] that could possibly be as important as combating climate change and providing habitat for plants and animals. And I believe it is also good to remember the importance of these areas for us as people [ndash] since we can find solitude and experience wild nature in them. There are so few remaining natural, old-growth forests that we urgently need to protect those that still exist and don[rsquo]t have a protected status.I feel very strongly that all the wilderness-related steps of the Ashley National Forest[rsquo]s forest plan revision - inventory, evaluation, analysis, and recommendations [ndash] have been done insufficiently and have resulted in an unacceptable final DEIS product. Please re- evaluate your work and take another look at all the unprotected wild lands that should be recommended for inclusion in the wilderness preservation system.Thank you for the opportunity to comment on the forest plan revision! Sincerely,Chad Hamblinconcerned citizen, outdoorsman, taxpayer And for:Jason Christensen [ndash] Director Yellowstone to Uintas Connection

February 17th, 2022Susan Eickhoff, Forest SupervisorAshley National Forest355 North Vernal Ave.Vernal, UT 84078Re: Comments - Ashley National Forest Plan Revision Draft EISComments submitted electronically online using the Comment and Response ApplicationDear Plan Revision Team,My name is Chad Hamblin. I am submitting comments on my own behalf as a concerned citizen. These comments have the official endorsement of Yellowstone to Uinta Connection, so I am also submitting the comments on that organization[rsquo]s behalf.About meI am a fifth-generation resident of the Uintah Basin. I live just south of the Uinta Mountains, and I

have spent, and continue to spend, a great deal of time recreating in wild areas of the Ashley National Forest [ndash] both in the Uinta Mountains and in the south unit of the national forest (Indian Canyon, etc.). I am thus very familiar with the areas that were evaluated for potential wilderness designation as part of the Forest Plan Revision process.About Yellowstone to Uinta ConnectionYellowstone to Uinta Connection (Y2U) is a 501c3 public interest organization whose staff and members have and will continue to work to protect the integrity of habitat for fish and wildlife as well as recreate in this region. We are concerned about the loss of integrity of the Regionally Significant Wildlife Corridor (Corridor) that connects the Greater Yellowstone Ecosystem and Northern Rockies to the Uinta Wilderness and Southern Rockies. The Yellowstone to Uinta Connection organization was given this name to bring attention to this Corridor and we use this name in reference to both the organization and Corridor as it provides context and public awareness to the location and its importance. Yellowstone to Uinta Connection is headquartered in Paris, Idaho with a satellite office in Bondurant, Wyoming.1. IntroductionMy comments here are exclusively about Ashley NF[rsquo]s wilderness evaluation and recommendations. I am also deeply concerned about all of the other issues addressed in the DEIS. For all of those other issues - logging, ATVs, grazing, fire, etc. - I fully support the comments submitted by Yellowstone to Uinta Connection, and I am officially signed onto that organization[rsquo]s comments as a concerned citizen.I was happy to know that the wild lands I know and care so much about were being evaluated as potential additions to the national wilderness reservation system. However, as I pointed out in the comments that I submitted on November 8, 2019, I was disappointed to see how fundamentally flawed and inadequate that evaluation was. I saw that some truly wild areas were not evaluated at all, and that many of the areas that were evaluated were given strange boundaries that, from my knowledge of those areas, don[rsquo]t make sense. I still wonder why there were so many flaws and omissions in the evaluation.When the Ashley National Forest made its Draft Environmental Impact Statement (DEIS) Available to the public a few months ago, and I saw the wilderness aspects of the plan revision, I was even more disappointed. I truly feel that this whole wilderness evaluation process has been a poor use of Forest Service Employee time, a poor use of taxpayer money, and most importantly a wasted opportunity to protect a vast amount of truly wild lands in need of protection as designated wilderness.My responses to various parts of the DEIS follow.2. Response to Summary of Areas Excluded in Alternatives by Wilderness Inventory Areas, found in Appendix G Recommended Wilderness Analysis ProcessI find it difficult to respond to the Ashley National Forest[rsquo]s reasons for not recommending areas for wilderness designation, because there is a lack of any specific information as to why any of the areas evaluated were not recommended. On page 155, where Alternative B is discussed, it merely says [ldquo]The remaining acres that were with the wilderness inventory and not selected to be included under this alternative were determined to have either conflicting uses that did not reflect the balance of multiple use the forest was striving for in this alternative and/or did not possess sufficient wilderness characteristics.[rdquo] For Alternative C it says almost the same thing: [ldquo]The remaining acres that were within the wilderness inventory area and inventoried roadless areas and not selected to be included under this alternative were determined to not be responsive to the input received in scoping and have either conflicting uses that do not reflect the balance of multiple use the forest was striving for in this alternativeand/or did not possess sufficient wilderness characteristics.[rdquo] I would like to know specifically what the conflicting uses are for each area evaluated, and I would like to know specifically why each rejected area was deemed to [ldquo]not possess sufficient wilderness characteristics.[rdquo]The rationales given in the Summary of Areas Excluded in Alternatives by Wilderness Inventory Areas (starting on pg. 161 of Appendix G, Recommended Wilderness Analysis Process) are so vague and repetitive that they don[rsquo]t really shed any additional light on why areas weren[rsquo]t considered for wilderness.It seems to me that rather than saying, [ldquo]This alternative considered the wilderness evaluation information which indicated these areas had wilderness characteristics and balanced this with other multiple uses to minimize existing conflicting uses when developing recommended wilderness areas[rdquo] for Alternative B for each area it would have been simpler to have made this vague, and to me quite meaningless, statement just once and noted that it applied to all units.Likewise, posting the statement, [ldquo]Responds to comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics,[rdquo] for Alternative C for each area evaluated seems unnecessary. Furthermore, that statement gives the false impression that wilderness is being proposed for all the areas when it[rsquo]s actually only being recommended for three of the twenty-eight areas. For those twenty-five areas with no

wilderness proposed what would be truthful would be to say, [ldquo]Rejects comments for additional recommended wilderness in inventoried roadless areas, and the wilderness evaluation information which indicated these areas had wilderness characteristics.[rdquo]In those three areas where some acreage is being proposed for wilderness, only a relatively small part of what qualifies as wilderness is actually being proposed for designation - so even in those areas I don[rsquo]t feel there is an adequate response to comments asking for additional recommended wilderness (it certainly isn[rsquo]t an adequate response to what I asked for).Another thing found in the Rationale section for each evaluated area is a bullet point with a statement about the number of [ldquo]Forest Service system roads cherry stemmed out of the area.[rdquo] Since cherry-stemming roads is allowed and has been done in the creation of many wilderness areas I don[rsquo]t see why this should be given prominence in the document. During a visit to the Dark Canyon Wilderness Area in southeastern Utah I saw that there is a road cherry-stemmed deep into the Wilderness. That cherry-stem is arguably more intrusive than any of the cherry-stemmed routes in the areas evaluated on the Ashley, but it didn[rsquo]t prevent the area from being designated and appreciated as a wilderness area.Also listed with a bullet point in the Rationale section for some areas is a grazing-related comment such as [ldquo]Multiple range improvements within the area.[rdquo] The University of Montana[rsquo]s Wilderness Connect website states that [ldquo]Where previously established, commercial grazing (i.e. cattle, sheep, etc. within permitted grazing allotments) may continue in wilderness, where it was occurring prior to designation. Permittees may be allowed to maintain range improvements, such as fences and watering facilities, that are necessary to the livestock operation or for protection of the range.[rdquo] Thus, range improvements are not a legitimate reason for excluding an area from wilderness recommendation.A few other bullet-pointed general categories were listed for some areas in the Summary of Areas Excluded in Alternatives by Wilderness Inventory Areas, and I will comment on some of them in my 3. Comments about a number of specific areas that were evaluated section of this document.3. Response to Step 2: Evaluation, found in Appendix G Recommended Wilderness Analysis ProcessI take issue with some things I see in the Step 2: Evaluation part of Appendix G, Recommended Wilderness Analysis Process. One issue is that for each area there is a note about what the local county government[rsquo]s opinion is for management of the area. Under the heading Question 4a: How can the area be managed to preserve its wilderness character?There is the question Are there specific Federal or state laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics? And then for each area an Outcome is listed stating the local county[rsquo]s opposition to wilderness designation. For example, for each area in the county I live in, Duchesne County, the statement is [ldquo]An objective in the 2017 Duchesne County resource management plan states [lsquo]Avoid designation of additional areas within the county as federally designated wilderness[rsquo].[rdquo]I would like to point out that an objective stated by a county commission doesn[rsquo]t qualify as a state or federal law and thus is irrelevant to the stated question. The public land managed by the Forest Service is national public land and belongs to all Americans. The county has no more authority in how that land is managed than the Forest Service has authority over how a county library is managed. The Forest Service can offer advice to the county if they[rsquo]d like to, but the county is under no obligation to follow that advice, and the reverse is also true.The first Measure listed for Question 4a: How can the area be managed to preserve its wilderness character? is Describe the shape and configuration of the area, and it for most of the areas that were evaluated part of the stated Outcome is a comment about the area having an irregular shape. My response to that is, [ldquo]could you possibly expect a wild area to naturally have anything but an irregular shape?[rdquo] I can[rsquo]t imagine a wild area being a perfect circle or square. I only know of one wilderness area with a regular shape [ndash] the Mountain Lakes Wilderness in Oregon, which is square-shaped; and I[rsquo]ve read that its boundaries could, and should, be expanded to give it a more natural and manageable shape. I certainly hope the planning team didn[rsquo]t look at areas unfavorably for having irregular shapes. (Since so little information is given about why areas were excluded from recommendation, I find myself guessing at possible reasons - including the shapes of the areas.)Some of the areas that were evaluated certainly did have very strange shapes, but that was by choice and not by necessity. The weird bubble-like exclusions from some areas make no sense to me and were not explained or justified by the plan revision team.I also hope the team didn[rsquo]t look unfavorably at areas for having a [ldquo]blocky[rdquo] shape (for example the Big Ridge area).4. Research Natural Areas (RNAs)On November 8, 2019 a number of conservation organizations, including Grand Canyon Trust, submitted comments on the forest plan revision. In those comments was a proposal to consider

recommending four specific areas for RNA designation as part of the Forest Planning process. The forest Service made no written response to those comments until earlier this month, after being asked about them in an email from Mike Popejoy to Forest Planner Anastasia Allen.Ms. Allen responded with an explanation of why the areas were not considered candidates for RNA designation, and Mr. Popejoy summarized his understanding of her response as follows: [ldquo]They basically said there's nothing special about the Audry Lake drainage; Big Brush Creek drainage is already represented by Ashley Gorge RNA; Sims Peak Potholes North is already represented by Sims Peak Potholes (even though we proposed an expansion); and South Fork Rock Creek Fen has a history of grazing.[rdquo] Having read Ms. Allen[rsquo]s comments I feel that Mr. Popejoy[rsquo]s summary of them is accurate.Among the things Ms. Allen said in her response to Mr. Popejoy was the following: [ldquo]We considered the existing RNAs on the forest, with their distinguishing features, and determined not to add additional areas with similar qualities. Also, most of the Ashley National Forest is grazed by livestock, which greatly limits RNA considerations across the forest due to objectives 3 and 6. All existing RNAs on the forest do not have or severely limit livestock grazing within or adjacent to them. Other anthropogenic activities are either non- existent or severely limited within current Forest RNAs.[rdquo]Because I[rsquo]ve spent time in most of the areas in question, Mr. Popejoy asked for my opinion about this. My response to him was as follows:[ldquo]Stacy says the Audrey Lake drainage [lsquo]represents thousands of acres throughout the Uinta Mountains.[rsquo] To me that comment doesn't fit well with her other comment that [lsquo]most of the forest is grazed by livestock.[rsquo] I still think Audrey Lake stands out as a place that appears to have never, ever been grazed by livestock. It looks significantly different to me than anywhere else I've been on the Ashley. If there is an RNA that represents a drainage of that type that isn't grazed she didn't name it in her response to you. I'm willing to say with almost 100% certainty that neither Stacy nor any other current Ashley employee has ever been to the Audrey Lake Drainage. It's extremely difficult to get to (thus the absence of grazing). Also, I would still like an explanation from the Ashley as to why they specifically excluded the lake and surrounding areas from their wilderness evaluation.I'm also willing to say with a high degree of certainty that Stacy and the other FS employees haven't been to the bottom of Big Brush Creek Gorge. Few people go there. I'm not as familiar with Ashley Gorge, but the parts I have seen were not exactly the same as Big Brush Creek Gorge.I don't know much about the fens, but I do hope they fence them to eliminate grazing.It seems stingy and unscientific to me to only allow one RNA per habitat type. No two areas are going to be exactly the same, and it seems like it would be nice to have multiple RNAs of each habitat type for comparison purposes.[rdquo]I will say more here of my thoughts about RNAs and the Ashley NF revision team[rsquo]s approach to them. First, I do take issue with the idea that there should only be one of each habitat represented. As a high school science teacher I know the importance of replication in experiments. According to a Yale University website, [ldquo]Replication reduces variability in experimental results, increasing their significance and the confidence level with which a researcher can draw conclusions about an experimental factor.[rdquo] I think observing and studying an RNA is like a science experiment, and having more than one RNA of a habitat type is basically a replication of the experiment.As I stated in my comments to Mr. Popejoy, no two areas are the same - and I would think researches would want to study differences, however subtle they may be, in two or more outwardly similar areas. I would think this would be even more important when you consider unforeseen natural or human impacts that could potentially occur in one area but perhaps not the other(s). For example, if one RNA is impacted by fire it would be important to see how it compares to a similar RNA that isn[rsquo]t impacted by fire [ndash] and both areas could [ldquo]Serve as baseline areas for measuring long-term ecological changes[rdquo](#6 of Forest Service Manual 4063.02) when compared with non-RNA areas. Objective #1 of Forest Service Manual 4063.02 doesn[rsquo]t say there should only be one RNA of each habitat type, and I think it[rsquo]s unfortunate the Ashley NF Revision Team chose to approach it that way.Ms. Allen stated that [ldquo]The fens did not qualify because of their long history associated with livestock grazing, with addition of timber harvesting and/or recreation use.[rdquo] Objective #3 of Forest Service Manual 4063.02 says, [ldquo]Protect against human-caused environmental disruptions.[rdquo] I don[rsquo]t think that should be read to mean an RNA has to be a place that has never been impacted by humans, but rather I think it would mean that an RNA is a place where measures should be taken to protect against human-caused disruptions. It[rsquo]s the place, not the causes of the disruptions to it, that should be protected. The Fens, not the grazing and timber harvesting that are disrupting them, should be protected. Why not fence livestock out of the fens and make the areas around them off-limits to

timber harvest?In supplemental comments submitted later to go with their original comments, the Grand Canyon Trust and other conservation organizations recommended that lands in the areas they had proposed for RNA status be evaluated for wilderness designation. I think those areas should be reevaluated and reconsidered for both RNA and wilderness designation.5. Conservation organization recommendationsI agree with the wilderness recommendations made in comments submitted jointly by the Grand Canyon Trust, Wilderness Society, and other conservation organizations in earlier stages of the Ashley NF plan revision process. I will quote them at times in my comments here, and I will simply refer to those organizations as GCTE (Grand Canyon Trust, etc.).See map- GCTE's recommended wilderness units, shown in light green The wilderness inventory polygon boundaries for areas evaluated in the South Ashley (Right Fork Indian Canyon, etc.) didn[rsquo]t have the omissions and irregularities seen in the areas evaluated in the Uinta Mountains, and because of that GCTE didn[rsquo]t submit maps or boundary change descriptions for those areas. I feel that the areas in the south unit of the Ashley are also deserving of wilderness designation, and I feel it is inappropriate for the revision team to have completely excluded that part of the forest from its wilderness recommendations.6. Comments about a number of specific areas that were evaluatedFollowing are my comments about some (not all) of the inventory areas that I feel should be designated as wilderness areas.Alkali Canyon Wilderness Inventory AreaThis is one of my favorite areas of the Ashley National Forest. I hike in this area in the summer and cross-country ski there in the winter. I think of it as an amazing and underappreciated part of the Ashley National Forest. I[rsquo]ve observed pinyon jays in the area, and I[rsquo]ve seen tracks of elk, bobcat, and mountain lion, and other species. Higher elevation areas provide important Greater Sage Grouse habitat. The area is also home to pronghorn. This area would add important pinyon-juniper habitat to the lands preserved as wilderness in the Ashley National Forest. The area provides unique experiences much different than what a person can experience in the Uinta Mountains.I feel this area should be designated as wilderness.See image- A nameless Canyon in the Alkali Canyon Wilderness INventory Area (note person in lower right corner for perspecitve) Copyright Chad HamblinBig Ridge Wilderness Inventory AreaI[rsquo]ve hiked in this area and I feel it should be designated as wilderness, using GCTE[rsquo]s boundaries.Carter Creek Wilderness Inventory AreaIn GCT[rsquo]s comments they stated, [ldquo]Because of its rugged, deep canyon, dense riparian vegetation, abundance of cultural sites, and outstanding beauty, Carter Creek is a gem of Flaming Gorge country and satisfies the criteria in the Chapter 70 directives, making the area suitable for inclusion on the National Wilderness Preservation System.[rdquo]My response to the Ashley[rsquo]s rationale for not recommending this area:Seven Forest Service system roads cherry stemmed out of the area: In the GCT[rsquo]s recommendations only one road (rather than the review team[rsquo]s seven) intrudes into the area and needs to be cherry stemmed, and due to the area[rsquo]s ruggedness the surrounding wild areas are not impacted much by that road. I find myself wondering why the revision team chose to include so many cherry-stems in their boundaries.Past vegetation treatments: The vegetation treatments are old, and from my experiences cross-country skiing and hiking in the area I[rsquo]d say they are substantially unnoticeable.Private inholding within the area: Private inholdings could easily be excluded from the area, and I have to wonder why the plan revision team chose to include them in the first place.GCTE[rsquo]s recommended boundaries exclude those private lands.Adjacent to State Highway 44 and the Red Canyon corridor: Many wilderness areas are adjacent to highways, so why should that be an issue here? Wilderness would help preserve the scenic beauty of the Red Canyon corridor, so the presence of the corridor should not be a reason to exclude the area but rather should be a reason to recommend the area as wilderness.I feel this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. Private lands are easily excluded and only one cherry-stem is included. Note the light-colored circular and straight-line shapes showing the odd boundaries given to the unit in the Ashley NF[rsquo]s evaluation (land within NF[rsquo]s evaluation boundaries is marked with dots).See [attachment for] image- Looking down Carter Creek Canyon from the west boundary of the unit. [copy] Chad HamblinCottonwood Wilderness Inventory AreaThis area provides a scenic backdrop for people traveling through Indian Canyon. I[rsquo]ve hiked and cross-country skied in the area and I think it should be designated wilderness.Cow Hollow Wilderness Inventory AreaGCTE listed the following highlights for this area:- Contains Ashley Gorge, Black Canyon, and Sims Peak, all outstanding landscape features.- Ashley Gorge is an extremely rugged and steep forested canyon that provides outstanding opportunities for solitude and which contains a 10-mile section of Ashley Creek that supports outstanding wildlife, historic, and geological values.- Black Canyon Creek was found

eligible for inclusion in the Federal Wild & Scenic Rivers System because of its outstandingly remarkable wildlife, scenic and geologic/hydrologic values.- Contains multiple historic sites that have been found eligible for the National Register of Historic Places.- The Sims Peak [ndash] Potholes and Ashley Gorge Research Natural Areas are within the unit[rsquo]s borders.- Over 93% of the unit is inventoried roadless areas.The Ashley NF[rsquo]s evaluation boundaries for this area make no sense to me. Large areas of Black Canyon and Ashley Gorge were inexplicably left out of the polygon of evaluated land. I have spent time in various parts of this area and can[rsquo]t see why key parts were left out. I would really like someone to explain the logic of that to me. The DEIS states that [ldquo]The inventory area is very irregularly shaped. The inventory area boundaries are primarily not tied to geographic locations and are difficult to distinguish between areas not included in the inventory.[rdquo] It was completely unnecessary and inappropriate to give this area those boundaries. The GCTE[rsquo]s recommended boundaries protect a large chunk of wild land in a solid, intact unit of wild country. Their boundaries would protect 25,878 acres.Of all of the wilderness inventory areas on the Ashley I feel this is one of the most deserving and in need of protection as wilderness. I think it[rsquo]s shameful that the Ashley NF revision team didn[rsquo]t recommend any acres of wilderness for this unit.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. Note the light-colored lines showing the odd boundaries given to the unit in the Ashley NF[rsquo]s evaluation (land within NF[rsquo]s evaluation boundaries is marked with dots).See [attachment for] image- Ashley Gorge looking south. Essentially everything on the right side of the photo was inexplicably left out of the evaluated polygon. [copy] Tim PetersonFlat Top Mountain Wilderness Inventory AreaSee my comments for North Slope East Uintas Wilderness Inventory Area/ South Slope East Uintas Wilderness Inventory Area.Goslin Wilderness Inventory AreaI[rsquo]ve enjoyed hiking in the wild area, and I think it should be designated as wilderness.See image- Rocky landscape about a half a mile east of Dripping Spring, left out of the FS[rsquo]s evaluation. [copy] Chad HamblinIndian Spring Wilderness Inventory Area, Mill Hollow Wilderness Inventory AreaI feel both of these areas should be re-considered for wilderness recommendation because they include headwaters of Avintaquin Creek, which contains a population of Colorado River Cutthroat trout.Lake Fork Mtn Wilderness Inventory AreaI enjoy visiting this area near Moon Lake, and I think it should be designated as wilderness.See [attachment for] image- View of the unit, looking southwest from a boat on Moon Lake. Much of the area next to the shore was left out of the FS[rsquo]s evaluation. [copy] Chad HamblinMt Lena Wilderness Inventory AreaThis area was doomed to fail the recommendation process because it is split into three pieces by two ATV trails. GCTE wisely avoided the problem by separating the area into a northern unit, north of the trails, and a southern unit, south of the trails (I[rsquo]m curious why the revision team didn[rsquo]t do the same). Each of the resulting units is plenty large and wild to qualify as a wilderness area [ndash] and they would each add their own unit things to the wilderness system.GCTE called the 13,800-acre north unit Speirs Peak, and here[rsquo]s some of what they said about it: [ldquo]The Speirs Peak unit offers solitude in a diversity of settings including the dense forests of its higher elevations, and the deeply incised canyons of Cart and Pipe Creek. Outstanding opportunities for primitive and unconfined recreation include outstanding hunting opportunities among the dense north-facing timber and broad meadows, as well as horseback riding, skiing, snowshoeing, camping and fishing opportunities.[rdquo]I[rsquo]ve enjoyed hiking in the area and I highly recommend it for wilderness.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. (land within NF[rsquo]s evaluation boundaries is marked with dots). Note the upper part of the Mount Lena unit at the bottom of the image.See [attachment for] image- Most of Cart Creek was left out of the FS evaluation, including this part. [copy] Chad HamblinFor the 10,048-acre southern unit GCTE kept the Mount Lena name. Here[rsquo]s that they said about this unit: [ldquo]Outstanding opportunities for solitude are easily found within the Mount Lena unit. The high forested peaks, and long forested ridges provide adequate screening and shelter from outside sights and sounds and other human activity within the unit. Anybody who ventures to the summit of Mount Lena, or into the headwater basin of Pothole Creek will have no difficulty in finding solitude. Outstanding opportunities for primitive and unconfined recreation in the unit include exceptional backcountry hunting opportunities, excellent and rewarding hiking to the summits of Limber Flag or Mount Lena, and backcountry skiing and snowshoeing opportunities as exhibited by the presence of Limber Flag yurt, which is located just outside and adjacent to the proposed recommended wilderness unit. These opportunities are enhanced by the easy access provided by FS roads and trails that line the boundaries of the unit on all sides.[rdquo]I[rsquo]ve done a lot of cross-country skiing in this unit during trips to the Limber Flag Yurt, and I

highly recommend the area for wilderness designation.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. (land within NF[rsquo]s evaluation boundaries is marked with dots). Note the lower part of the Speirs Peak unit in the upper left of the image.See [attachment for] image- Craggy terrain in the vicinity of Limber Flag Peak. [copy] Chad HamblinNorth Slope East Uintas Wilderness Inventory Area/ South Slope East Uintas Wilderness Inventory AreaCCTE recommends this as one large wilderness area [ndash] which they call East Uintas High Country, combining the Ashely NF[rsquo]s Flat Top Mountain, South Slope East Uintas, and North Slope East Uintas units. The area is 219,551 acres in size. Here[rsquo]s what the GCTE said about this area in their comments:- 219,551 acres (combines the FS[rsquo]s Flat Top Mountain, South Slope East Uintas, and North Slope East Uintas units).- Largest tract of unprotected contiguous, unroaded and undeveloped FS lands remaining in the Ashley National Forest.- Includes outstanding landscape features like mountain peaks (Marsh Peak, Leidy Peak, and Paradise Peak), Whiterocks Cave, cirque basins, and lakes.- Contains multiple historic sites that have been found eligible for the National Register of Historic Places.- Contains the Pollen Lake Research Natural Area and Uinta Shale Creek Research Natural Area.- Home to populations of Colorado River Cutthroat trout, Oncorhynchus Clarkii Pleuriticus, a subspecies that is included on the Utah Sensitive Species List.- Over 94% of the unit is inventoried roadless area.The GCTE boundaries include some wild country that was incorrectly left of the Ashley NF[rsquo]s evaluation [ndash] including the west side of Uinta Canyon. I spend a lot of time in that area and can vouch for its wildness.The GCTE recommendation includes important low-elevation habitat not represented in the High Uintas Wilderness.I feel this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. It can be seen that wildlife corridors between the High Uintas Wilderness and lower elevation lands are protected.See [attachment for] image- The west side of Uinta Canyon, which contains thousands of acres of wild land that were left out of the Forest Service[rsquo]s evaluation. [copy] Chad HamblinNutter[rsquo]s Canyon Wilderness Inventory AreaI think this area should be given some kind of extra protection [ndash] wilderness or some other designation [ndash] to protect the archaeological resources of the area.Pole Creek Wilderness Inventory AreaI spend a lot of time hiking, camping, fishing in this area and I also enjoy visiting Pole Creek Cave. The cave features of the area are something that gives this area increased importance for protection. I highly recommend the area be designated as wilderness [ndash] using the boundaries suggested by GCTE.See [attachment for] image- A visitor explores Pole Creek Cave, one of the outstanding features of the unit. [copy] Chad HamblinRight Fork Indian Canyon Wilderness Inventory AreaAt over 46,000 acres this is the third largest area evaluated for wilderness on the Ashley NF (only the South Slope East Uintas area and the North Slope East Uintas areas are larger), and I think it would make a great wilderness area and should be recommended for wilderness designation.Other than the vague [ldquo]balanced this with other multiple uses[rdquo] statement made for all areas (as I mentioned earlier) the only things listed in the rationale are cherry-stemmed roads and range improvements [ndash] both of which (as I explained earlier) are allowed in wilderness and shouldn[rsquo]t be a reasons to exclude this area.I hike and cross-country ski in this area, and one of the things I enjoy seeing in the area is the fascinating, beautiful bristlecone pines. According to researchers at Brigham Young University there are at least fifteen stands of Great Basin bristlecone pines in the area (you can see their map here). Yet for some reason there is no mention of the species anywhere in the DEIS[rsquo] Appendix G Recommended Wilderness Analysis Process. Bristlecones are also not mentioned for the Cottonwood Inventory Area or the Wire Fence Inventory area [ndash] both of which also have stands of them, as shown on BYU[rsquo]s map. (The description of the Wire Fence area does state that there is [ldquo]less than 1% 5-needle Pine[rdquo] but doesn[rsquo]t elaborate on what species they may be referring to, so it could be limber pine or bristlecone pine.)I must ask, were bristlecone pines purposely omitted from the lists and descriptions of vegetation for these areas, or was this a result of negligence or ignorance on the part of the revision team? I would hope the Ashley[rsquo]s employees are aware of this species in these areas. Are they overlooked because they are not considered economically important? I hope their ecological importance is recognized. About a year ago I wrote an article about Great Basin Bristlecone Pines for the Utah Native Plant Society[rsquo]s bulletin. You can see it here. I think the occurrence of bristlecone pines in the area is one of many reasons the Right Fork Indian Canyon Inventory Area should be designated wilderness.See [attachment for] image- Bristlecone pines in the Right Fork Indian Canyon Inventory area. [copy] Chad HamblinSheep Creek East Wilderness Inventory AreaI enjoy visiting this wild, rugged area and I strongly feel it should be designated as wilderness.Sheep Creek West Wilderness Inventory AreaHere is some of what GCTE

said about this area:- A wildlife corridor for animals moving between parts of the Ashley National Forest, and animals moving between the Bridger Teton National Forest and the Ashley National Forest.- Contains the Sheep Creek Canyon Geologic Area.- Contains the Sheep Creek Cave and Sheep Creek Spring, both outstanding landscape features.- Contains multiple historic sites that have been found eligible for the National Register of Historic Places.- Protects three watersheds functioning at risk.- 97% of the unit is inventoried roadless area.I strongly feel this area should be designated as wilderness.See [attachment for] image- Sheep Creek and adjacent wild country, seen from the east side of the unit. [copy] Chad HamblinSouth Fork Rock Creek Wilderness Inventory Area/ Dry Ridge Wilderness Inventory AreaGCTE[rsquo]s recommended combining the FS[rsquo]s South Fork Rock Creek and Dry Ridge inventory areas since they are connected by wild country that meets the requirements to be considered for wilderness. The Ashley NF inexplicably left out wild lands to the north of, and to either side of, upper Stillwater reservoir and on both sides of Rock Creek Canyon below the reservoir. The FS also left out a big zig-zaggy chunk of land that includes Audrey Lake and extends to the southeast. I[rsquo]ve hiked in that wild, remote area and have seen no reason for that land to have been excluded from the inventory. I would really Like to know why it was excluded.Here is some of what GCTE said about their recommended area:- 32,078 acres (combines FS South Fork Rock Creek and Dry Ridge units).- Combined unit corrects faulty boundary delineation between FS South Fork Rock Creek and Dry Ridge units; units should be combined to meet criteria for boundary delineation detailed in Chapter 70.- The unit is contiguous with the High Uintas Wilderness along its northern boundary and is not separated from the Wilderness by any human impact or other qualifying boundary feature; as such it can be said that the South Fork Rock Creek unit contains many of the same wilderness characteristics as those found and managed for in the High Uintas Wilderness.- The unit is a wildlife corridor for animals moving between the Uinta Wasatch Cache National Forest to the west and the Ashley National Forest.- Contains multiple historic sites that have been found eligible for the National Register of Historic Places.- Includes several watersheds that are functioning at risk. - Over 97% of the unit is inventoried roadless areas.I feel this area should definitely be designated as wilderness, using GCTE[rsquo]s boundaries.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. Note the light-colored lines showing the strange boundaries given to the South Fork Rock Creek and Dry ridge units in the Ashley NF[rsquo]s evaluation [ndash] which GCTE combined into one unit. (Land within NF[rsquo]s evaluation boundaries is marked with dots.) I would really like an explanation of how and why the NF[rsquo]s boundaries were chosen.See [attachment for] image- Wild country between Bear Lake and Audry Lake that was inexplicably left out of the FS[rsquo]s evaluation. [copy] Chad HamblinTimber Canyon East Wilderness Inventory Area, Timber Canyon West Wilderness Inventory AreaThese areas provide important wildlife habitat and I think they should be reconsidered for wilderness designation.Wagon Road Ridge Wilderness Inventory AreaGCTE made the following comments about this area, which they call Wagon Wheel:- Wildlife corridor for animals moving between the Ashley and Uinta-Wasatch-Cache and corridor for animals moving between the High Uintas Wilderness to the north and winter range to the south (including the Tabby Mountain Wildlife Management Area).- Contains the Castle Rocks, an outstanding landscape feature.- 98% of the unit is inventoried roadless.This is an area where the Ashley NF[rsquo]s evaluation area boundaries make no sense whatsoever to me. Those boundaries had this wild area split in to two areas separated by a large unnecessary gap, and those Ashley NF areas have roads going right through the middle of them. GCTE[rsquo]s boundaries here are the only boundaries that make sense to me. I[rsquo]ve hiked in various parts of this area, including the parts left out of the Ashley NF[rsquo]s evaluation, and I can attest to the wildness of the entire area recommended by GCTE.I feel this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended wilderness unit. Note the light-colored lines showing the bizarre boundaries given to the unit in the Ashley NF[rsquo]s evaluation (land within NF[rsquo]s evaluation boundaries is marked with dots). As with other areas I would really like an explanation of how and why the NF[rsquo]s boundaries were chosen.See [attachment for] image- A series of waterfalls in Swift Creek. This part of Swift creek was left out of the FS[rsquo]s evaluation, and the part of the creek that was evaluated by the FS, further upstream, contains a much smaller amount of water. [copy] Chad HamblinWire Fence Wilderness Inventory AreaI hike and cross-country ski in this wild area, and one of the things I enjoy most about the area is the impressive ice flows that form each winter at a particular pour-off. I feel that this area would make a great addition to the wilderness preservation system.See [attachment for] image- These ice flows never cease to amaze me. [copy] Chad Hamblin7. Comments about wilderness-quality

areas that weren[rsquo]t evaluatedIn their comments submitted earlier in this process GCTE proposed the addition of seven wilderness areas that weren[rsquo]t evaluated for wilderness by the Ashley NF. At least some of those areas were evaluated previously in the 2006 Evaluation of Undeveloped Areas For Potential Wilderness Draft Information Packet. Information about three of those areas is included here.Big Brush CreekFrom earlier GCTE comments: The Ashley National Forest included this area in its 2006 Evaluation of Undeveloped Areas For Potential Wilderness Draft Information Packet. In the time since that evaluation, the area has retained its wild, natural condition and we feel it should be included in this current inventory. If anything, the wildness of the area has increased since 2006, as personnel from the Ashley National Forest have done a great job of closing and blocking vehicle routes in accordance with the current forest travel plan. The area contains almost 7,000 acres of rugged wildland that provides valuable habitat for plants and wildlife, and provides opportunities for solitude and primitive recreation for human visitors.This is one of my favorite places, and I feel very strongly that this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended Big Brush Creek wilderness unit.See [attachment for] image- Looking northwest in Big Brush Gorge, from a point near the southeast corner of the unit. [copy] Chad HamblinLightning RidgeFrom earlier GCTE comments: The Ashley National Forest included this area in its 2006 Evaluation of Undeveloped Areas For Potential Wilderness Draft Information Packet. In the time since that evaluation the area has retained its pristine condition and we feel it should be included in this current inventory. The area contains over 6,000 acres of rugged wildland that provides valuable habitat for wildlife, and provides opportunities for solitude and primitive recreation for human visitors.I feel this area should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended Lightning Ridge wilderness unit.See [attachment for] image- View to the south on top of Lightning Ridge. [copy] Chad HamblinRed CanyonHere is what GCTE said about this area:- 6,347 acres.- 96% of the unit is Inventoried Roadless Area.- Contains one of Utah[rsquo]s most popular day use river trips in a highly scenic, relatively pristine canyon of the Green River.- Home to the region[rsquo]s best tailwater trout fishery whose preservation and health is vital to sustaining the local economy.- Agreement was reached in 2014 to protect a stretch of the Green River in this unit as Wild and Scenic in the Rep. Rob Bishop Public Lands Initiative.I enjoy visiting this area and feel is should be designated as wilderness.See [attachment for] image- GCTE[rsquo]s recommended Red Canyon wilderness unit.See [attachment for] image- Boating the Green River in the Red Canyon proposed wilderness. Photo [copy] Tim Peterson8. Comments about the areas where wilderness is recommendedThe Flat Top Mountain, Goose Egg Peak, East Uintas, and Queant Lake areas are all recommended for wilderness designation in the DEIS, and I think each of those areas should be protected as wilderness. However, I don[rsquo]t think those areas should be looked at separately. There is wilderness-quality land connecting all of those areas and I think they should all be considered together with the lands between them and the lands adjacent to them, as shown in the maps of the areas recommended by GCTE.Out of the hundreds of thousands of acres of lands that qualify for wilderness designation I feel it is unacceptable that such a paltry amount of land is being recommended as wilderness, and I feel this either shows a lack of understanding and appreciation on the part of the revision team, or a lack of courage.9. The need for more wilderness, especially in lower elevation areasElevationI think it is important to note that the additional acres that are being recommended for wilderness designation are high-country lands similar to what is already protected in the High Uintas Wilderness Area. While I think it[rsquo]s great to add more high-elevation lands to the High Uintas Wilderness, I think it is much more important to add lower elevation lands [ndash] ecoregions with habitat types that are currently lacking in wilderness protection. For example, ponderosa pine forests and aspen forests are two habitat types that I think are very much lacking in protection and should be added to the wilderness preservation system as much as possible. These habitat-types, along with sagebrush habitat, pinion juniper habitat, and other habitat types would benefit from [ldquo]Low Uintas[rdquo] and South Ashley wilderness area designations.Much of what would be added in the Ashley National Forest[rsquo]s recommended additions would be above timberline in the Bollies [ndash] an example of the [ldquo]rock and ice wilderness[rdquo] that already has more relative representation than so many other habitat types in the wilderness preservation system.See [attachment for] image- Lower elevation habitat in GCTE[rsquo]s recommended East Uintas High Country Wilderness Area. Only the most distant part of this photo was evaluated by the FS. [copy] Chad HamblinWildlife and PlantsDeer, elk, and many other species migrate between high-country habitat and low-country habitat. It doesn[rsquo]t do them much good to have protected lands in the high country if they lose the low elevation winter habitat that they also

depend on for their survival. And there are also all of the full-time lower elevation species of plants and animals that need protection just as much as the high-country speciesSee [attachment for] image- A mule deer fawn resting in the relatively low-elevation Pole Creek Evaluation area. [copy] Chad HamblinAccessibility and RecreationThe high Uintas Wilderness is more difficult to access than the lower elevation wilderness- quality lands in the summer, and it is extremely difficult to access in the winter via the non- motorized means of skies or snowshoes. There are many accessible wild areas in the Ashley that are great for cross-country skiing and snowshoeing that currently qualify as wilderness, but none of them are designated as wilderness or recommended in the DEIS as wilderness - and they are threatened with the possibility of losing their wilderness character. I[rsquo]ve only once ever cross-country skied in the High Uintas Wilderness and it was brutally difficult and not something I plan on ever doing again (unless of course the boundaries are changed to include more accessible places). On the other hand I have cross- country skied a lot in areas that would be protected through designation of lower-elevation lands.Even in the summer I seldom visit the High Uintas Wilderness, because I prefer to recreate in the lower areas that are currently unprotected and at risk of losing their wilderness character. The wilderness character of those areas is specifically why I enjoy them.See [attachment for] image- My cross-country ski tracks in the Mt. Lena area - winter recreation in a beautiful, and accessible, wild landscape. [copy] Chad Hamblin10. ConclusionI feel that, considering the ever-worsening climate crisis afflicting the world and considering the role natural forests play in countering the causes of the crisis through their absorption and sequestering of carbon, it is now more important than ever to permanently protect areas through designation as wilderness. The wild lands of the Ashley are now more important than ever as habitat for the vegetation and wildlife that depends on them. I can[rsquo]t think of any [ldquo]existing conflicting uses[rdquo] that could possibly be as important as combating climate change and providing habitat for plants and animals. And I believe it is also good to remember the importance of these areas for us as people [ndash] since we can find solitude and experience wild nature in them. There are so few remaining natural, old-growth forests that we urgently need to protect those that still exist and don[rsquo]t have a protected status.I feel very strongly that all the wilderness-related steps of the Ashley National Forest[rsquo]s forest plan revision - inventory, evaluation, analysis, and recommendations [ndash] have been done insufficiently and have resulted in an unacceptable final DEIS product. Please re- evaluate your work and take another look at all the unprotected wild lands that should be recommended for inclusion in the wilderness preservation system.Thank you for the opportunity to comment on the forest plan revision! Sincerely,Chad Hamblinconcerned citizen, outdoorsman, taxpayer And for:Jason Christensen [ndash] Director Yellowstone to Uintas Connection