Data Submitted (UTC 11): 2/14/2022 7:00:00 AM
First name: Jonathan
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Organization: Western Watersheds Project, Wyoming Office
Title: Director
Comments: Western Watersheds ProjectFebruary 15, 2022Dear Ashley Planning Team,We have reviewed the proposed forest plan thoroughly. The Forest's proposed plan fails in numerous areas to comply with the planning regulations."determine[hellip]the availability of lands and their suitability for resource management" (16 U.S.C. 1604(e)(2).The primary action authorized by the Forest that has the greatest impact and covers the greatest area and is the most poorly managed is, by far, livestock grazing. Yet the proposed plan fails to determine suitability, based on well-known criteria such as those laid out in the R4 protocol, attached.[sect] 219.10 Multiple use.While meeting the requirements of [sect][sect] 219.8 and 219.9, the plan must provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area as follows: (emphasis added)But, again, this capability has not been laid out. What is current forage production? What is current ecological condition of grazed lands? What is a science-based harvest coefficient? What is the history of the Forest Service's efforts at managing its livestock grazing program? And as a result of these factors what area are capable and not capable for authorizing livestock? The Forest Plan is entirely silent.(v) Suitability of lands. Specific lands within a plan area will be identified as suitable for various multiple uses or activities based on the desired conditions applicable to those lands. The plan will also identify lands within the plan area as not suitable for uses that are not compatible with desired conditions for those lands. The suitability of lands need not be identified for every use or activity. Suitability identifications may be made after consideration of historic uses and of issues that have arisen in the planning process. Every plan must identify those lands that are not suitable for timber production([sect] 219.11). (36 CFR 219.7(e)(1)(v)).Again, we see another set of requirements to determine suitability of lands within the planning area. This has not been done.Plan components must be within the inherent capability of the plan area, Forest Service authority, and the fiscal capability of the unit (36 CFR 219.1(g)).No information is provided regarding the inherent capability of the plan area or the budgetary capability, now or predicted to implement the Forest Plan.Regarding species management, the 2012 planning regulations state:The premise behind the coarse-filter approach is that native species evolved and adapted within the limits established by natural landforms, vegetation, and disturbance patterns prior to extensive human alteration. Maintaining or restoring ecological conditions similar to those under which native species have evolved therefore offers the best assurance against losses of biological diversity and maintains habitats for the vast majority of species in an areaFederal Register / Vol. 77, No. 68 / Monday, April 9, 2012 / Rules and Regulations at 21212The proposed plan does not implement this. The few Standards and Guidelines contained in the proposed plan do not provide for similar ecological conditions to what the species evolved in.A perfect example of this is the failure to provide for amphibian habitat. We provide extensive reviews of the Best Available Science (BAS) for these species, but the proposed plan fails to require ecological conditions similar to those that the species evolved under.The final rule would further require additional, species-specific plan components, as a "fine-filter," to provide for additional specific habitat needs or other ecological conditions of certain categories of species, when the responsible official determines those needs are not met through the coarse-filter. The species for which the rule requires fine filter plan components, when necessary, are federally listed threatened and endangered (T&E) species, proposed and candidate species, and species of conservation concern.Ibid At 21212Again, the proposed plan fails to provide any fine filter species requirements applicable to the impacts currently occurring or easily predicted to continue occurring from authorized actions.(1) Required plan components. Every plan must include the following plan components:(i) Desired conditions. A desired condition is a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined, but do not include completion dates.(ii) Objectives. An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives should be based on reasonably foreseeable budgets.(iii) Standards. A standard is a mandatory constraint on project and activity decisionmaking, established

to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements.(iv) Guidelines. A guideline is a constraint on project and activity decisionmaking that allows for departure from its terms, so long as the purpose of the guideline is met.Desired conditions and objectives without Standards and Guidelines are like gears stripped of their teeth. They don't do anything.As an example, the Forest Service defines:Standards:1. Place design or operational constraints on projects and activities, or prohibit the Forest Service from authorizing certain types of projects or activities to help achieve or maintain desired conditions, to avoid undesirable effects, or to meet applicable legal requirements (see required topics for standards or guidelines in sec. 23, ex. 01 of this Handbook).([sect] 219.15(d)(3)). Guidelines are established to help achieve or maintain a desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements.The proposed plan does not implement Standards and Guidelines needed to achieve desired conditions or objectives, or to avoid undesirable effects or meet legal requirements.Frequently what we found were Standards and Guidelines dealing with minor issues, yet no Standards and Guidelines for the vast majority of the impacts from a particular activity.219.8 (a) Ecological sustainability. (1) Ecosystem Integrity. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity,Take, for instance, the impacts of livestock grazing on ecological sustainability and species habitats. The proposed plan fails to implement Standards and Guidelines applicable to a wide range of these impacts(3) Riparian areas. (i) The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of riparian areas in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity,There are no Standards for the management of riparian areas despite these areas being some of the most degraded areas on the Forest due to the Forest's century long failure to implement effective management of these areas.There is no Standard to comply with state water quality standards. As worded, the proposed plan allows for violations of state water quality standards by authorized activities.219.9 (a) Ecosystem plan components. (1) Ecosystem integrity. As required by [sect] 219.8(a), the plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore their structure, function, composition, and connectivity.(2) Ecosystem diversity. The plan must include plan components, including standards or guidelines, to maintain or restore the diversity of ecosystems and habitat types throughout the plan area. In doing so, the plan must include plan components to maintain or restore:(i) Key characteristics associated with terrestrial and aquatic ecosystem types;(ii) Rare aquatic and terrestrial plant and animal communities; and(iii) The diversity of native tree species similar to that existing in the plan area.(b) Additional, species-specific plan components. (1) The responsible official shall determine whether or not the plan components required by paragraph (a) provide the ecological conditions necessary to: contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area.If the responsible official determines that the plan components required in paragraph (a) are insufficient to provide such ecological conditions, then additional, species-specific plan components, including standards or guidelines, must be included in the plan to provide such ecological conditions in the plan area.Again, no Standards and Guidelines are provided for "key characteristics".1909.12_20 22.1 1. Objectives, desired conditions, standards, and guidelines must be written clearly and concisely in a way that allows for monitoring to test their effectiveness and verify assumptions on which they are based.A fatal flaw of the Forest Plan is that livestock grazing no longer is reviewed under NEPA. Permit renewals are now universally rubber stamped under FLPMA 402c2. This failure to examine the impacts of livestock grazing combined with the failure to update AMP's results in major impacts going uncorrected.The Forest Plan states:Protecting water quantity and quality, the timing of flows, and national forest watersheds are critical to sustaining ecosystem functions of the Ashley National Forest.But the Plan contains no Standards reflective of the "critical" nature asserted by the Forest Service.There are no Standards to implement the Soils section Goals. The few Guidelines only address a tiny fraction of the soils impacts from Forest Service actions.This section does not comply with FSM 2500 R4 Supplement.In the watershed section, there are no Standards for the protection of fens. In fact there are no Standards at all. Again, as with nearly every resource category, there are nice sounding Goals but no requirements or limitations to reach those Goals.In the

Fisheries section there is a Desired Condition of <20% fines, which is a well- researched and critical component of fisheries habitat, but no Standards to get there.Shading and overhanging vegetation has been known to be critical for more than 60 years, but no requirements or limitations to provide that.The few Guidelines ignore the majority of impacts to fisheries habitat.For RMZ's we see a focus on providing for "desired nonnative plant, vertebrate, and invertebrate communities". Neither the FP nor the EIS even mention "desired nonnative' let alone list them or provide a rationale as to why they are supposedly "desired".FW-DC-TV 06 suffers from this same problem. Has the Forest taken the required "hard look" at this? No.Again, this critical section, specifically emphasized in the 2012 regulations, has not a single Standard to implement it. The 4 Guidelines deal with only a tiny subset of the impacts that commonly occur within RMZ's.Under Terrestrial Vegetation the Forest Plan states:Desired conditions, standards, and guidelines for terrestrial vegetation are to be applied at the forestwide scale unless otherwise specified.This dilution to the 'forestwide' scale renders all these plan components meaningless.Despite the focus of the 2012 regulations on providing species with the habitat they evolved under this section completely ignores that, providing not a single Standard and instead on allowing nonnative species to be used across the Forest.No examination of what "nonnative" species are included. Guideline 02 states that "they should not invade and displace neighboring resilient native communities." But there is no analysis as to which species supposedly meet this definition.In the vegetation section we see the reliance on "plants of moderate to high resource value" but this has no connection to Historic Climax Plant Community.I am attaching a recent review of the "moderate to high resource value" theory by the Forest Service that explains in detail why the use of this theory is inappropriate.See 20180302 K17 WildlifeInputOnPlantSpeciesComposition Desired Conditions and AdjToProposedActionForWildlife_2-20-2018FW-DC-NFV 01 suffers from this same failure.FW-DC-NFDS 01 fails to deal with the critical component of Biological Soil Crust (BSC) and instead remains in the 19th century in thinking (and managing for) bare soil.To protect aspen regen the plan provides a Guideline:To help support sprouting and sprout survival sufficient to perpetuate the long- term viability and resilience of aspen clones, livestock utilization of key forage species should be limited to no greater than 50 percent of current year's growth, except where long-term monitoring and research demonstrates that a different allowable use level is appropriate.But provides no scientific or rational support that a 50% use limit on herbaceous protects aspen regen from browse.In FW-OB-NFV 01 we see "move towards upward trend". What does that even mean? This section has the objective of restoring 2,500 acres of degraded areas but neither the FP nor the EIS discuss where these degraded conditions are. To make matters far worse, the Objective simply seeks to "maintain desired conditions" to meet this ObjectiveIn the Climate Change section we see the stated position that "Land management response to current or future climate and its effects is critical to minimizing the risks of climate change impacts." Yet there is no follow through regarding requirements or limitations.What are the effects of climate change now on vegetative communities? What are the predicted changes over the next 20-30 years? Would it be expected that livestock allocations set at the middle of the 20th century would still be valid? Of course not. Does the Forest Plan address this? No.In the Wildlife section we see no follow through for the DC's and OB's. This entire section contains no Standards.The livestock section is a work of fiction. The preamble of this section states:Livestock grazing on National Forest System lands is an important contribution to the social and economic importance of rural communities. Domestic livestock grazing is authorized on active grazing allotments on the Ashley National Forest, and permit holders participate in managing grazing on these allotments. The allotments are managed to be responsive to current Federal and State environmental laws and regulations. Livestock grazing plan components are designed to support terrestrial vegetation, riparian areas, soils, socioeconomics, and other resource plan components. They apply adaptive management practices that use science and ecological conditions to inform decisions and respond to drought and documented climate changes.Livestock grazing is such a tiny contributor to the area economy as to be meaningless. No data supports the idea that livestock grazing on FS lands is important economically. The Forest Plan nor the DEIS discuss or implement 'adaptive management'. There is nothing implementing adaptive management in the livestock section this preamble covers.The DC's fail to encompass critical issues related to the impacts of livestock grazing. For instance, is it likely that forage availability, currently and with the significant warming and drying predicted to continue, will be the same when allocations were made 70 years ago? Has there been changes in in range science and priorities for ecosystem function since then?The goals, likewise, are meaningless and disconnected from the impacts of livestock grazing.There is not a single Standard despite this

impacting the most acres of any activity.The Guidelines also are something out of the 1950's. The 2012 planning regulations require the use of best available science. Range science has not supported the use of 50% utilization in western systems for decades. The EIS provides no support for the choice of 50%. Let alone basic plant health and soil building, how does the 50% utilization limit provide for pollinators or winter range among many issues. We examined the literature cited in the DEIS and also found nothing to support the Forest's decision.The primary range science textbook sums up current science regarding utilization rates when it states: "Conventional wisdom has been that moderate stocking involves 50 percent use of forage (Table 8.2). This guideline applies well in the southern pine forests, humid grasslands, and annual grasslands but results in rangeland deterioration in[hellip] coniferous forest rangelands" (pg. 140 of Holechek et al. 2011).The textbook's review of the literature found that Troxel and White, 1989, Lacey et al, 1994, Johnson et al, 1996, White and McGinty, 1997 as well as USDA NRCS, 1997 all recommend stocking based on allocation of "25% of the current year forage to livestock, and another 25% to natural disappearance (insects, wildlife, weathering) with 50% left for site protection. The approach developed by Holechek (1988) is based on maximizing forage by livestock, while Troxel and While (1989) works well for range betterment and minimization of risk." Id at 157. The textbook concludes that "use of a harvest coefficient higher than 25% invariably leads to land degradation." Id at 157.Galt et al, 2000 in Rangelands 22(6) echoes the foundational importance of proper stocking rates "We increasingly hold the opinion that a 25% harvest coefficient is a sound idea for most western rangelands. After careful analysis of their own and existing research, Johnston et al. recommended a 25% harvest coefficient for Australian rangelands. It allows both forage species and livestock to maximize their productivity, allows for error in forage production estimates, greatly reduces problems from buying and selling livestock, reduces the risk of financial ruin during drought years, and promotes multiple use values."As a reminder, FSH 2209.21, at 32.1 requires that proper use criteria be based on the limiting factor:The limiting factor, as to the degree of grazing allowed, may be the degree of use of key species in riparian habitats, degree of use allowed on critical wildlife habitats, such as big game winter ranges, calving areas, nesting, and brooding areas, esthetics, and so forth. Appropriate disciplines should be used to help identify limiting factors and help design and monitor the studies necessary to determine when proper use has been reached.Develop proper-use criteria from interdisciplinary input; for example: fishery surveys, stream surveys, vegetative trend analysis, research findings, coordination requirements, observations, and good judgment. It is necessary that they be based on the factor that becomes critical first; the limiting factor. Where similar soils, ecological types, and coordination requirements extend over an entire rangeland management unit, a given set of proper-use criteria may be applicable to an entire management unit. On the other hand, where a mosaic of streams, soils, vegetation types and coordination requirements exist, it is necessary to develop separate criteria for each important situation. On some rangeland management units, it may be necessary to establish more than one set of proper-use criteria. (emphasis added. Note "coordination requirements" are requirements like MA emphasis.)Similarly, no support was provided for the choice of 4" stubble on the greenline with the supposed rationale of "forage resources in riparian areas". If this were the case the use would be measured in the riparian areas not "between the greenline and bankfull".How dies such a short stubble provide for fisheries habitat needs of shade and overhanging vegetation? How does a 4" stubble height provide for amphibian habitat?The EIS is entirely silent on these issues.Again, the pattern is clear, there are Standards and Guidelines for minor, insignificant impacts while all the primary types of impacts are ignored.Again to remind you:The premise behind the coarse-filter approach is that native species evolved and adapted within the limits established by natural landforms, vegetation, and disturbance patterns prior to extensive human alteration. Maintaining or restoring ecological conditions similar to those under which native species have evolved therefore offers the best assurance against losses of biological diversity and maintains habitats for the vast majority of species in an areaFederal Register / Vol. 77, No. 68 / Monday, April 9, 2012 / Rules and Regulations at 21212This direction has not been implemented.We provide a literature review on the issue of annual bank trample and all the literature points to a maximum 20% annual trample limit, but the Forest Plan and the EIS are entirely silent on this.Bighorn SheepThe Regional Forester has designated bighorn sheep as a Species of Conservation Concern (SCC), demonstrating that they have "determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area." 36 CFR [sect] 219.9 9 (c). As such, the Forest must include plan components that will "maintain a viable population of each species of conservation concern within the plan area." When plan components designed to

maintain ecosystem integrity and diversity will not be sufficient to ensure population viability for an SCC, the Forest must develop species-specific plan components that will ensure the species will persist. 36 CFR [sect] 219.9 9 (b)(1).No Alternative included in the draft plan meets the requirements of the 2012 planning rule, as no alternative contains actionable measures to address threats to the bighorn sheep population from pathogens carried by domestic sheep.Under all Alternatives included in the draft plan, the Forest Service will not address the risk stemming from authorized livestock grazing in the absence of voluntary measuresinitiated by a grazing permit holder. Voluntary permit waivers may never occur, however, meaning that the greatest threat to bighorn sheep persistence, and the one which has been responsible for the greatest number of bighorn sheep deaths on the Forest, will continue indefinitely. The Forest Service acknowledges this, albeit in a misleading manner: "Forest plan components specific to bighorn sheep would reduce the risk of contact between domestic sheep and bighorn sheep by providing separation of domesticsheep and bighorn sheep when a permit is waived without preference." DEIS Appendix D at 11. In reality, Forest plan components specific to bighorn sheep would reduce the risk of contact between domestic sheep and bighorn sheep by providing separation of domestic sheep and bighorn sheep only if a permit is waived without preference.In order to comply with the SCC requirements of the 2012 Planning Rule, the Forest Service must utilize the best available science to determine areas where domestic sheep grazing puts wild bighorn sheep at risk of disease, and must directly address those areas through actionable and effective plan components regardless of whether commercial forest users accede. This includes vacating domestic sheep allotments that are shown to be high and moderate risk based on the best available science even in the absence of voluntary permit waivers.In order to ensure the continued persistence of bighorn sheep on the Forest, the Ashley must include clear and effective standards addressing the significant known threats to bighorn populations. At a minimum, those standards must include the following:- Maintain effective separation of domestic sheep and bighorn sheep on active grazing allotments to reduce the likelihood and risk of disease transmission. Effective separation is defined as spatial and/or temporal separation between bighorn sheep and domestic sheep resulting in minimal risk of contact and subsequent transmission of respiratory pathogens between animal groups. Effective separation is determined through quantitative methods, including the Risk of Contact model or other best available science. Minimal risk of contact and disease transmission is defined as a cumulative estimated disease interval of greater than 50 years occurring from all sources which could impact a bighorn population, including those occurring off Forest Service lands.- Authorized activities limiting connectivity and genetic exchange between bighorn sheep herds are prohibited.- Projects that will result in displacement of bighorn sheep are prohibited.- The use of pack goats is prohibited within the likely foray distance of bighorn sheep herds.- The use of sheep and goats for vegetation management is prohibited within the likely foray distance of bighorn sheep herds.- Domestic sheep and goats authorized to graze on the Forest will be counted when moved onto and off of allotments, and counts will be reported to CPW within 24 hours.- Known or suspected contacts between bighorn sheep and domestic sheep and goats will be reported to CPW within 24 hours.- Stray, unattended, or unauthorized sheep and goats will be reported to CPW within 24 hours.- Bighorn sheep observations outside of documented use areas will be reported to CPW within 24 hours.- Domestic sheep or goats left unattended, stray domestic sheep or goats, or domestic sheep or goats not within an authorized sheep and/or goat use area or time period will be impounded or lethally removed within 24 hours of an initial report, or as soon as possible. Efforts shall be made to contact the owner prior to impoundment or removal, but mitigation of risks to bighorn sheep will be prioritized.- Following the discovery of permitted sheep or goats outside of an authorized area or time period, authorizations and permit terms and conditions will be reviewed and revised as needed to prevent further risk scenarios. If sheep and goats cannot be managed to prevent straying or dispersal outside of an authorized area or time period, the domestic sheep/goat permit(s) will be revoked.Cattle have been implicated in pneumonia-related die-offs of bighorn sheep, as well as in outbreaks of Bovine Viral Diarrhea and other diseases impacting wild sheep. Bovine respiratory syncytial virus (BRSV) and bovine parainfluenza virus 3 have been identified as co-agents in pneumonia outbreaks in bighorn sheep populations, affecting bighorn herds exposed to primary agents Mycoplasma ovipneumoniae and Mannheimia haemolytica. Mannheimia haemolytica originating in cattle is believed to have been a primary respiratory disease agent in at least one bighorn sheep pneumonia outbreak. See Spraker, T., Collins, J., Adrian, W., Otterman, J. (1986). Isolation and serologic evidence of a Respiratory Syncytial Virus in bighorn sheep from Colorado. Journal of Wildlife Diseases, 22(3), 416-418 Dassanayakea, R., Shanthalingam, S., Herndon, C., Subramaniam, R.

Paulraj K. Lawrence, Bavananthasivam, J., Cassirer, F., Haldorson, G., Foreyt, W., Rurangirwaa, F., Knowles, D., Besser, T., Srikumaran, S. (2010).Mycoplasma ovipneumoniae can predispose bighorn sheep to fatal Mannheimia haemolytica pneumonia. Veterinary Microbiology, 145, 354-359.Wolfe, L. Diamond, B., Spraker, T., Sirochman, M., Walsh, D., Machin, C., Bade, D., Miller, M. (2010). A bighorn sheep die-off in southern Colorado involving a Pasteurellaceae strain that may have originated from syntopic cattle. Journal of Wildlife Diseases, 46(4), 1262-8.BuyoutsVoluntary permit relinquishment and allotment closure is a commonly practiced tool for conflict resolution.The following Standard should be added:Grazing privileges that are lost, retired, relinquished, canceled or have base property sold without transfer would have attached AUMs held for watershed protection and wildlife habitat.Best Available Science[sect] 219.3 Role of science in planning.The responsible official shall use the best available scientific information to inform the planning process required by this subpart. In doing so, the responsible official shall determine what information is the most accurate, reliable, and relevant to the issues being considered. The responsible official shall document how the best available scientific information was used to inform the assessment, the plan decision, and the monitoring program as required in [sect][sect] 219.6(a)(3) and 219.14(a)(4). Such documentation must: identify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered.As attachments, we provide some BAS that needs to be implemented into the Forest Plan1) Trample - BT Alteration Implementation - Final - Literature review on streambank alteration impacts and limit implementation2) Amphibian management:a. DeLong_2015_ReviewAndAnalysisScienceForSpFrogA V3 - Current BAS literature review on Sensitive amphibian species habitat needsb. Amphibians_BridgerTeton_PowerPointc. 20140625AmphibianWorkshopAgendaPresentationsCombined Part1 1 2 and 3d. Presentation_HerbRetentionForAmphibs_3-31-20213) Herbaceous vegetation management for wildlife needsa. ZZ C_AppendixA_WhyHerbSpeciesCompositionIsImportab. ZZ B_ApplicabilityOfR4Watershed-protectionSpeciesc. ZZ AdjToProposedActionForWildlife_2-20-20184) Grazing Managementa. Carter et al 2017 Upland Water and Rotational Grazingb. Cattle Impacts to Water Quality in Sierra Nevadac. Clary - Managing Grazing of Riparian Areas int_gtr263 HIGHLIGHTEDd. Compatibility of Grazing Systems with Fisheries - Platts1989e. Dobkin et al Riparian Recover (grazing)f. Duck Creek paperg. Final TR 1737-17 - copyright free versionh. Final TR 1737-20 See highlighted sectionsi. Grazing and Riparian Management - Myers Undated -j. Grazing Impacts to Macroinverts - Herbst et al 2012k. Hart Mt - Removal of Livestock Increases Bird Density and Vegetationl. Hart Mt Riparian recovery - Batchelor et al 2015m. Impacts of Livestock Grazing on Fish and Wildlife in Riparian - Ohmart 1996n. Livestock Effects on Water Quality Bibliographyo. Meyers, Fiske, Layhee. 2017. Pathogenic bacteria in streams on CA NFWe look forward to working with the Forest Service in fulfilling the intent of NEPA, NFMA and the other statutes and regulations the Forest Service works within, through a complete and accurate analysis of the impacts of the plan.Recently, we provided a complete standalone Forest Plan for the Manti-LaSal revision process which can be found at https://www.mantilasalconservationalternative.org/More than 90% of this alternative would be directly applicable to the Ashley National Forest.We also incorporate by reference the comments submitted by Yellowstone to Uintas Connection.Sincerely,Jonathan B. RatnerDirector, Wyoming Office