



# UINTAH COUNTY

## STATE OF UTAH

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February 6, 2022

*Submitted via electronic mail:* <https://www.fs.usda.gov/main/ashley/landmanagement/planning>

Susan Eickhoff  
Forest Supervisor  
Ashley National Forest  
355 North Vernal Avenue  
Vernal, Utah 84078

Subject: **Ashley National Forest Plan Revision Draft EIS**  
RDCC Project No. 81423

Dear Supervisor, Eickhoff:

Uintah County has reviewed the Ashley National Forest Plan Revision Draft Environment Impact Statement (DEIS). The County appreciated participating as a Cooperating Agency in the preparation of the Forest Plan Revision and the DEIS. Alternative D seems to be the most consistent with the County's interests and with the County's Resource Management Plan (RMP). The County offers the following general and technical comments for your review and consideration. We hope that our comments will be helpful in this process.

### **General Comment Regarding Current Forest Management**

Future management of the Ashley National Forest is very important to Uintah County and our citizens who use the forest for a wide variety of recreation activities or to generate income for their families. Decades of passive forest management under the current plan has led to unhealthy forest conditions which make it ripe for disease and uncharacteristic catastrophic wildfire.

*Cooperation, Coordination and Consistency*

When creating Land Use Plans, the USFS is required to coordinate their Plans with State and Local Government plans. Coordination is a separate process from Cooperation and must occur regardless of whether State or Local Governments were designated Cooperating Agencies. Agencies must make efforts to draft Federal Plans that coordinate with State and Local Plans.

The National Forest Management Act requires the USFS to coordinate with local governments but does not specify how the process of coordination is to be accomplished.

Forest Service regulations require:

- Responsible officials coordinate with local governments.
- Responsible officials shall review local plans and policies that are relevant to the federal plan. The review will consider the objectives of local plans, the compatibility and interrelated impacts between local and federal plans, opportunities to address impacts and contribute to joint objectives, and opportunities to resolve or reduce conflicts. This review must be included in the NEPA document.
- The responsible official will not direct or control management of lands outside of the planning boundary.

Consistency between federal, state, local, and tribal plans is the desired outcome for the coordination and cooperation processes required of federal agencies. The importance of coordination and cooperation between state, local, and Federal agencies during planning processes cannot be overstated. Early involvement and equal consideration in environmental reviews, as interdisciplinary team members, stakeholders, and Cooperating Agencies was the County's main objective and motivation for creation of our RMP. The RMP shall be followed unless inconsistent with any federal statute or duly promulgated regulation.

Page 6 of the DEIS states that: "The Forest Service collaborated with cooperating agencies throughout the planning process to consider ways the forest plan could contribute to common objectives, address impacts, resolve or reduce conflicts, and contribute to compatibility between the Forest Service and other agencies' plans."

The County requests that the DEIS be amended to recognize that some of the cooperating agencies have their own RMPs and indicate whether the USFS intends for the forest plan to be consistent with these plans to the greatest degree possible.

Page 323 of the DEIS addresses "Plan Consistency Review." Unfortunately, there is no mention in this section and of the inconsistencies between alternatives B & C and the County's RMP.

The County's RMP can be found at <http://co.untah.ut.us/Res%2008-12-2019%20R1-%20Uintah%20Resource%20Management%20Plan-%20CC%20Approved.pdf> Several areas of inconsistency between the proposed forest plan and its alternatives are discussed below.

### *Special Designations (Wilderness & Wild and Scenic Rivers)*

Page 5 of the DEIS states that: “Such temporary classifications do not guarantee formal designation, but they do influence forest plan guidance of how to manage the recommended areas.”

The County’s position is that there is no “temporary classification” established when a recommendation is made for a wild and scenic river or wilderness designation. Only Congress has the authority to “classify” lands or waters as wilderness or wild and scenic rivers. Instead, the term “recommended designation” (see footnote 1 in Table 2-1) should be used.

The County’s RMP, in Section 25, contains the following policies associated with Wilderness:

25.4.4 The county’s support for any recommendations made under a statutory requirement to examine the wilderness option during the revision of land and resource management plans or other methods will be withheld until the following are clearly demonstrated:

- The adopted transportation plans of the state and county or counties within the federal land management agency’s planning area (National Forest or BLM land) are fully and completely incorporated into the baseline inventory or information from which plan provisions are derived.
- Valid state or local roads and rights-of-way are recognized and not impaired in any way by the recommendations.
- The possibility of future development of mineral resources by underground mining or oil and gas extraction by directional or horizontal drilling or other non-surface disturbing methods are not affected by the recommendations.
- The need for additional administrative or public roads necessary for the full utility of the various multiple uses, including recreation, mineral exploration and development, forest health activities, operation and maintenance of water facilities, and grazing operations on adjacent land, or on subject lands for grandfathered uses, are not impaired by the recommendations.
- Minimization criteria is applied in proposed areas.
- The analysis compares the full benefit of multiple-use management to the recreational, forest health, and economic needs of the state and the county to the benefits of the requirements of wilderness management.

25.4.5 Public lands that were determined to lack wilderness character during previous wilderness review processes cannot be managed as if they were wilderness based on new or revised views of wilderness character.

Considering the County’s policies, the wilderness recommendations of alternatives B and C must not be selected. The only alternatives that would be consistent with County policies associated with wilderness are A and D.

### *Effects of Wilderness Management on Forest Health*

Page 71 of the DEIS states that: *“Wilderness management protects riparian and wetland ecosystems through minimizing ground disturbance, eliminating motorized access, and reducing recreation use, all of which reduce impacts on riparian and wetland vegetation and inhibit the spread of nonnative species.”*

This may be true in the short term, but the “hands-off” approach to wilderness management increases the long-term risk of uncharacteristic wildfire, which can destroy riparian and wetland ecosystems.

Page 71 of the DEIS also states that: *“Hydrologic processes can be adversely affected by management activities, such as fire suppression, prescribed fire, timber extraction, fuels reduction, noxious weed treatments, road construction, recreation, and livestock grazing.”*

It should be recognized here that hydrologic processes can also be adversely affected by the lack of management activities in special designation areas such as wilderness. The inability to conduct restoration projects in wilderness area will hamper efforts to restore watersheds inside wilderness to properly functioning condition.

Page 119 of the DEIS states that: *“Terrestrial vegetation types, primarily alpine and conifer forest, would be subject to wilderness management direction, as described previously.”*

The County requests that the document be amended here to recognize that wilderness management direction removes many tools otherwise available to benefit terrestrial vegetation communities.

Page 119 of the DEIS states that: *“Alternative D also allows for minimum impact suppression tactics only in wilderness. Emphasis is to manage fire for protecting developed resources and would have limited focus to maintain or improve terrestrial vegetation types.”*

It is important to have flexibility in the forest plan to suppress naturally occurring fires in wilderness before they spread out of wilderness areas and do tremendous damage to ecosystems. The County recommends adding this flexibility to Alternative B.

### ***Effects of Wilderness Management on Recreation***

Page 15 of the DEIS states that: *“Mechanized travel (i.e., mountain bikes) is permitted on existing roads and trails.”*

E-bikes are growing in popularity as they offer an alternative mode of transportation for those physically unable to pedal a mountain bike over steeper terrain. The DEIS should indicate whether “e-bikes” are considered motorized travel or mechanized travel and if they would be permitted in special designation areas on the Ashley National Forest<sup>7</sup>.

Page 185 of the DEIS (Table 3-52) indicates that the visitor satisfaction levels in designated wilderness areas, (associated with developed facilities and services) rates at 96.6% satisfaction.

This data seems suspect when there are no developed facilities or services allowed in wilderness areas.

Page 205 of the DEIS states that: *“Access for recreation would also be maintained for all communities. However, the level of access and the recreational experience may be affected by variation in management areas that restrict future motorized access (i.e., recommended wilderness).”*

The County requests that the DEIS be amended here to recognize that wilderness areas restrict access to citizens with mobility disabilities and the elderly; many of which also have low incomes and should be part of the environmental justice considerations.

Page 206 of the DEIS states that: *“As discussed in the recreation section, users looking for solitude may have limited opportunities in the Ashley National Forest due to high demand and limited ROS classes with these opportunities.”* Page 207 states that: *“However, communities valuing solitude and naturalness for cultural uses may have limited options in the long term.”*

The County questions these conclusions that there may be limited opportunities/options for solitude considering there are at least 276,175 acres of High Uintas Wilderness on the Ashley National Forest (with even more acreage on the Uinta-Wasatch-Cache NF) and some 637,700 acres of Inventoried Roadless Areas on the Ashley NF that provide ample land area for solitude seekers.

### ***Effects of Wilderness Management on the Timber Industry***

Page 211 of the DEIS states that: *“In addition, alternative C has the lowest level of forest product removal of the action alternatives. This is because of an emphasis on natural processes for vegetation management and an increase in the acres managed as recommended wilderness areas and backcountry recreation areas where timber harvest would be restricted. This alternative would result in the lowest availability and removal of forest products and the associated economic effects related to the timber industry. Economic effects of forest product removal under alternative C would support 35 jobs and \$1.8 million in labor income in the local economy, annually.”*

Page 244 of the DEIS states that: *“Alternative B would introduce two additional areas for recommendation as wilderness, totaling approximately 10,300 acres. These newly recommended wilderness areas would prohibit timber production to maintain the option for future designation as wilderness, thus reducing the acres suitable for production when compared with alternative A.”*

Page 245 of the DEIS states that: “*Alternative C would include the most acres managed to maintain wilderness characteristics; no acres would be found suitable for timber harvest within these areas to preserve the suitability of these areas for wilderness designation. Alternative C would also introduce additional miles of suitable [streams] for inclusion in the NWSRS. This would reduce the available acres for timber harvest.*”

The reduction of lands suitable for timber production in favor of additional wilderness acreage under alternatives B and C would be inconsistent with adopted County RMP policies, as follows:

RMP, page 25:

10.4.1 Use active and adaptive forest management to improve forest health and support multiple use and sustained yield with emphasis on employment, forest product production, open space, wildlife habitat, forage, recreation, and other social and economic benefits.

10.4.2 Manage forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by society, including ecosystem and community health and resilience.

10.4.3 Encourage and support the expansion of the local forest product market at sustainable harvest levels.

RMP, pages 26-27

***Forest Management Policies***

10.4.15 USFS forest plans should address commercial tree species selection, stocking levels, age class distribution, integrated pest management, and fuel loading. Additionally, areas for timber and non-timber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.

10.4.18 Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.

10.4.24 Forest management plans shall be written, and effective management techniques should be adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative.

RMP, pages 27 and 31

### ***Inventoried Roadless Area Policies***

10.4.33 Uintah County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially with in the county and their suggested future management classifications.

10.4.34 Uintah County supports efforts by the State of Utah to petition the Department of Agriculture and Congress to establish new management provisions for Inventoried Roadless Areas across the state.

12.4.19 Uintah County calls for the re-inventory, boundary adjustment, consolidation or deletion of the Inventoried Roadless Areas within or partially with in the county and their suggested future management classifications.

### ***Effects of Backcountry Management areas on Recreation***

Page 71 of the DEIS states that: *“In general, watersheds with more than 1 mile of road per square mile can be considered to have moderate to high road density (Forest Service 2011c).”*

The County disagrees with this general consideration regarding road density. If a road were 20 feet wide, a mile of road would occupy 105,600 square feet or 2.42 acres of a 640-acre square mile. This is only .00378 percent of a square mile occupied by roads; which is hardly a moderate to high road density.

Page 211 of the DEIS states that... *“Recreation experience—As under alternative B, alternative C would include the establishment of recreation management areas. Under alternative C, however, recreation emphasis would focus on expanded backcountry management areas and further restrict motorized use in these areas. This alternative also has the most acres set aside as proposed wilderness, and it includes additional stream segments managed as suitable for inclusion in the NWSRS.”*

This reduction of motorized recreation opportunities under alternative C in favor of additional wilderness and backcountry management areas would be inconsistent with adopted state and local resource management plan policies associated with motorized recreation as follows:

RMP, pages 49-50

19.4.14 State and federal land management agencies shall achieve and maintain traditional access to outdoor recreational opportunities available on federal lands as follows:

- Hunting, trapping, fishing, hiking, camping, rock hounding, OHV travel, biking, geological exploring, pioneering, recreational vehicle camping, and sightseeing are activities that are important to the traditions, customs, and character of the county and should be allowed to continue.
- Wildlife hunting, trapping, and fishing should continue at levels determined by the Utah Wildlife Board and the Utah Division of Wildlife Resources. Traditional levels of group camping, group day use, and other traditional forms of outdoor recreation, both motorized and non-motorized, should be allowed to continue.
- The broad spectrum of outdoor recreational activities available on the subject lands should be available to citizens for whom a primitive, non-motorized, outdoor experience is not preferred, affordable, or physically achievable.

19.4.16 Existing levels of motorized public access to traditional outdoor recreational designations in the county must be continued, including both snow machine and OHV use.

19.4.17 OHV loops should be provided to connect communities with the region. Open area riding as well as looped and stacked trail systems should be offered, with a variety of levels of trail difficulty.

#### ***Effects of Backcountry Management areas on Timber Industry***

Page 245 of the DEIS states that: *“Under alternative C, there would be an emphasis on management of recreation areas to improve the backcountry experience for recreationists, unlike under alternative A. This management would increase the acreage of backcountry management areas and would prohibit timber harvest within them. This would result in the decreased number of acres suitable for timber production and harvest.”*

Reduction of lands suitable for timber harvest in favor of backcountry management areas would be inconsistent with our adopted RMP policies, (see policies previously listed under “Effects of Wilderness Management on the Timber Industry).”

#### ***Effects of Alternatives B and C and special designations on Grazing***

Page 18 of the DEIS states that: *“Under alternative B, forage for livestock grazing would have specific utilization levels included in management (50 percent) as well as 4-inch stubble height guidelines to provide criteria to help meet desired conditions for terrestrial vegetation.”*

Establishing one-size-fits-all utilization levels and stubble height guidelines is inconsistent with the County RMP. If exceptions or on-site modifications are allowed under Alternative B, please indicate here. A more flexible, adaptive management approach, such as

proposed in Alternative D, accounting for range conditions at site-specific locations, should be used to meet desired conditions.

Pages 210-211 of the DEIS state that: *“An alternative assumption (that all affected pastures would be closed and not proportionally reduced) would result in a larger reduction of HMs—a loss of 3,318 HMs—and a small, but measurable, impact on the regional economy. Whether the entire pastures would be closed would depend on whether the management areas could be managed to restrict cattle (for example, with fencing, natural barriers, or herding). The closure of these allotments would result in an estimated loss of 7 jobs and \$120,000 in labor income on an average annual basis. This would result in the lowest estimated HMs of all alternatives and the lowest level of economic effects, in terms of jobs and income related to livestock grazing.”*

Pages 251-252 of the DEIS state that: *“The most likely impact from management of recommended or designated wilderness would be alterations to the timing and intensity of grazing operations to meet desired conditions to maintain wilderness character. Other potential impacts on grazing management due to recommended or designated wilderness include impacts to access of allotments for maintenance of structural range developments, the ability to haul salt and minerals, and the retrieval of sick animals due to restrictions on motorized use.”*

Page 253 of the DEIS states that: *“Forage for livestock would be limited to 50 percent utilization and a stubble height of 4 inches unless monitoring indicates a different level sufficient to meet and maintain desired conditions (table 3-68). In areas where these guidelines are not met and exceptions are not made, there could be modifications to the timing and intensity of grazing operations, particularly adjustments to livestock numbers or season of use, or both, and associated reductions in numbers and season of use permitted to grazing operators, when compared with alternative A.”*

Page 254 of the DEIS states that: *“Under alternative C, forage for livestock would be limited to a level of 40 percent utilization and a stubble height of 4 inches (table 3-71). Exceptions will not be made for utilization levels and stubble-height guidelines.”*

The one-size-fits-all utilization and stubble height standards and restricting the timing and intensity of grazing in favor of increased areas managed to maintain wilderness characteristics under Alternatives B and C (see previous four references above) is inconsistent with our adopted RMP policies listed below. The flexibility in Alternative D is preferable.

RMP, page 38-39

15.4.1 Maintain cattle and sheep grazing on BLM and U.S. Forest Service lands at historic levels and historic seasons of use.

15.4.3 Manage lands to maintain or increase forage allocation for livestock grazing. Require annual checking and verification that lands are still up to standard.

15.4.4 Public land agencies should not decrease livestock grazing permits and grazing allocations below present levels considering the impacts of fire and drought.

15.4.15 Land management plans, programs, and initiatives should provide the amount of domestic livestock forage, expressed in AUMs, for permitted, active use as well as the wildlife forage included in that amount, be no less than the maximum number of AUMs sustainable by range conditions in grazing allotments and districts, based on an on-the-ground and scientific analysis.

15.4.16 The county favors the best management practices that are jointly sponsored by cattlemen's, sportsmen's, and wildlife management groups such as chaining, logging, seeding, burning, and other direct soil and vegetation prescriptions that are demonstrated to restore forest and rangeland health, increase forage, and improve watersheds in grazing districts and allotments for the mutual benefit of domestic livestock and wildlife. When the practices described above increase a grazing allotment's forage beyond the total permitted forage use that was allocated to that allotment in the last federal land use plan or allotment management plan still in existence as of January 1, 2005, a reasonable and fair portion of the increase in forage beyond the previously allocated total permitted use should be allocated to livestock as recommended by a joint, evenly balanced committee of livestock and wildlife representatives that is appointed and constituted by the governor for that purpose. The county favors quickly and effectively adjusting wildlife population goals and population census numbers in response to variations in the amount of available forage caused by drought or other climatic adjustments, and state agencies responsible for managing wildlife population goals and population census numbers will give due regard to both the needs of the livestock industry and the need to prevent the decline of species to a point where listing under the terms of the Endangered Species Act is possible, when making such adjustments.

#### ***Effects of Alternatives B and C Scenery Requirements on Utilities and Infrastructure***

Page 273 of the DEIS states that: *“The prohibition of new communication sites, roads, utility corridors, and other infrastructure in recommended wilderness areas would be the same as described under alternative B; however, recommended wilderness would occur over a greater area of the national forest. This would constitute 50,200 acres under alternative C, compared with 10,300 under alternative B. Any maintenance to dams, bridges, and administrative and drinking water facilities would require methods designed to ensure preservation of wilderness values. This would result in increased maintenance costs associated with compliance.”*

Another reason that Alternative C is not acceptable to the County is the increased costs of maintaining water infrastructure in wilderness areas or wilderness study areas. For example, recent stabilization of a high mountain lake in the High Uintas Wilderness cost

some \$600,000 more than it normally would have due to the requirement to airlift equipment to the job site by helicopter.

Page 296 of the DEIS states that: *“Under alternative C, SIO acres would be assigned to the forest, as shown in table 3-84 (see figure 2-10). Alternative C would increase the number of acres in areas where the management emphasis would maintain or enhance the valued scenic character. This is because 74 percent of the lands would have high or very high SIOs, compared with 51 percent under alternative A.”*

This high percentage of high or very high SIO’s under Alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with our RMP policies set forth in this letter, including the provision of utilities and infrastructure, such as communication towers and transmission lines needed to serve a growing population and a growing renewable energy power grid.

Page 297 of the DEIS states that: *“Every 5 years, the Forest Service would consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternative A.”*

If the need for an easement arose, a proponent should not have to wait for the beginning of the next 5-year review period before such easement could be considered. The annual review in alternative D is preferable for flexibility in responding to easement requests.

Page 299 of the DEIS states that: *“Therefore, when combined with the impacts described above from reasonably foreseeable future actions, alternative C would have the fewest cumulative impacts on the scenic character.”*

While Alternative C would preserve scenic character to the greatest degree, this high percentage of high or very high SIO’s under Alternative C would likely impact the ability of the Ashley National Forest to manage the forest for multiple use in accordance with our RMP policies contained in this letter.

Page 304 of the DEIS states that: *“Recent increased activity in large transmission projects, such as the Zephyr, Energy Gateway South, and Transwest Express projects, demonstrates that along with increased interest in communication uses and technologies, the demand for enhanced energy infrastructure and electrical connectivity is on the rise and is expected to increase.”*

The high percentage of high or very high SIO’s under Alternative C would likely impact the ability of the Ashley National Forest to accommodate these increasing demands for energy transmission infrastructure to the detriment of clean energy development and reliability of the power supply in the western grid.

## Technical Comments

The remainder of our comments focus on sections of the DEIS where corrections are needed, or additional statements should be added to the analysis or conclusions. Text shown in **bold, underlined type** indicates text that should be added to the DEIS. Text in **bold type** indicates County suggestions for improvement of the DEIS or reasons for the edits suggested. Text that is overstruck should be removed from the DEIS. The County believes that these edits will better inform the decision maker of the implications of the various alternatives and lead to a better result. The County also agrees with all the edits to the DEIS that have been submitted by the State of Utah. The County's comments are as follows and are listed by DEIS page number:

### Page

18 Specifically for bighorn sheep, management has been included to limit authorization of new permitted domestic sheep or goat allotments unless separation from domestic sheep and goats can be demonstrated, or research **and consultation with state wildlife management agencies** indicates that the potential for pathogen transfer would be limited.

19 Increased restrictions on resources uses, such as timber, would support ecosystem services associated with clean water, ~~including municipal water supplies.~~ **Restricting timber harvest may enhance water quality but would likely reduce the quantity of water produced by a watershed, which would negatively impact municipal water supplies.**

32 ...a 70-acre portion the Ashley National Forest north of Vernal is at the ~~northwest~~ **northeast** extreme of this nonattainment area boundary. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.**

36 The Ashley National Forest is in conformance with each of the NAAQS, except for 70 acres that fall within the ~~northwest~~ **northeast** boundary of the Uintah Basin marginal ozone nonattainment area. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.**

38 Emissions in the 70-acre portion of the Ashley National Forest that lies in the ~~northwest~~ **northeast** boundary of the Uintah Basin marginal ozone nonattainment area would be similar to those that currently occur. **Given the location north of Vernal and those portions of the nonattainment area are in Duchesne County (below an elevation of 6,250 feet) this 70 acres must be in the northeast extreme; not the northwest.**

39 Under all alternatives, vegetation and fuels treatments would be used, in varying degrees, to reduce tree density and the quantity of surface fuels and to remove insect-affected trees, which, in turn, lowers the risk of severe wildfire. **Alternative C would rely more on natural processes than active vegetation management.**

48 Soil quality in these areas can be expected to be maintained or altered depending on the management of recreation and livestock grazing impacts. **Fire and fuels management (or the lack thereof) also has a significant impact on soil quality in special designation areas. Focusing solely on recreation and grazing impacts could be interpreted as being bias against those activities.**

53 This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height ~~exceeds~~ **exceeding** 4 inches is rare.

60 Human-made stressors on stream dynamics and hydrology include dams and diversions, herbivory from livestock and wild ungulates, fire suppression, roads, and motorized recreation. **Non-motorized recreation can also affect stream dynamics and hydrology, such as non-motorized trail improvements near streams. Failure to list that stressor could be interpreted as showing bias for non-motorized recreation and against motorized recreation.**

61 The area includes a portion of the Ashley National Forest encompassing the Duchesne-Roosevelt Ranger District and portions of the Vernal Ranger District within the Whiterocks River drainage that is within the original treaty boundary of the Uintah and Ouray Ute Indian Reservation (Indian Country). **Please provide a map of what is considered “Indian Country” by the EPA.**

72 These protective plan components would reduce impacts on water quality from surface disturbance, recreation, and motorized and nonmotorized users but may prohibit certain restoration projects that could benefit water quality in the long term.

72 This raises the possibility of increased sedimentation, higher water temperatures, and shifts in flood severity or frequency, essentially destabilizing watersheds, when compared to Alternatives B and D.

72 The threat of uncharacteristic wildfire would continue and be the highest of all alternatives, except for Alternative C, which would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment.

74 The threat of uncharacteristic wildfires would continue and would be the highest under all alternatives (except for Alternative C); the overall watershed condition would be at risk from uncharacteristic wildfires with the potential to reduce overall WCF scores. **Alternative C would have the highest acreage of special designations where active vegetation and fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire.**

76 Recommended wilderness areas include extra protection for riparian and wetland vegetation, including restrictions on surface disturbance, development, and access that would

preserve riparian and wetland vegetation and structure in these areas; however, restrictions on restoration **and fuels management** in recommended wilderness could affect the Forest Service's ability to improve **and protect** these riparians, wetlands, and possibly fen communities.

79 Impacts on water quality would be reduced, compared with alternative A, from reductions in surface disturbance, restrictions on motorized travel, and a reduction in the concentration of recreation users. **However, areas with special designations rely more on natural processes rather than active fuels management and restoration projects, which can lead to increased risk of uncharacteristic wildfire and resultant negative impacts on water quality from "flood after fire" events.**

80 Alternative C would reduce disturbance from such activities as recreation and mechanical treatments, compared with alternative A; however, additional constraints on restoration treatments could also affect the effectiveness of restoration. **Alternative C would rely more on natural processes, which could leave riparian vegetation at greater risk for uncharacteristic wildfire.**

82 Improper grazing, such as intensive grazing in riparian, wetland, and fen communities may change the vegetation composition by reducing highly palatable plant species while increasing less palatable plant species, including nonnative and invasive plant species; reduce vegetation cover; diminish plant species richness; and reduce the hydrological function related to the quality and quantity of riparian and green line vegetation. Desired condition plan components common to all action alternatives for riparian areas, livestock grazing, and soil should minimize the potential for adverse impacts related to livestock grazing. **This statement implies that flexible grazing management could lead to improper grazing, which would not be the case if forest service range managers are doing an effective job of managing allotments.**

83 Beyond the Ashley National Forest boundary, past, present, and future actions by other entities, as well as activities associated with rural residential communities, **impact watersheds and aquatic and riparian ecosystems.**

89 Together, these coniferous vegetation types cover about 53 percent of Ashley National Forest lands, with mixed conifer and ~~Engelmann spruce~~ **Lodgepole pine** comprising the largest amounts. **Table 3-14 indicates more acreage of Lodgepole pine than Engelmann spruce.**

127 Table 3-27: **Please explain to the reader how a flame length can be less than 0 feet. Perhaps it would be better to use "unburnable" as in Table 3-28?**

131 However, with a greater proportion of managed wildland fire, there would be an increased risk of the unintended outcome/consequence that a fire could escape; this could lead to larger wildfires, habitat and watershed damage, and recreation closures. Depending on the extent of such fires, impacts may persist over the long term. **In addition, Alternative C would have the highest acreage of special designations where active vegetation and**

**fuels management would not be allowed and allowing wildfires to burn would be the main fuel treatment. Thus, under Alternative C, there would be the highest risk of uncharacteristic wildfire. Management direction under Alternative C relies on natural processes, which removes many tools otherwise available to reduce the risk of uncharacteristic wildfire.**

147-148 Management concerns related to this species include habitat impacts from invasive plant species, climate change, oil and gas development, predation, and livestock grazing (Forest Service 2017a). **Wildfire, whether natural or human-caused, should be considered as one of the major impacts on greater sage grouse habitat.**

153-154 **The analysis assumptions need to address predation of these species, which is one of the major stressors.**

176 Unlike the other action alternatives, limits to forage utilization and stubble height would not be predetermined, but they would be based on land health standards. This could limit habitat improvements for wildlife and at-risk species if greater forage utilization and lower stubble height were generally used; this would translate to reduced habitat features such as forage and cover. **With forage utilization and stubble height determined based on land health standards, this should not translate to reduced habitat features provided that USFS range managers are accurately assessing land/range health.**

189 and elsewhere: 2008 Beliefs and Values study (Russell 2008) **The 2008 Krannich study was based on responses from residents in the Daggett, Duchesne and Uintah County area. Where were the respondents from in the Russell study? If those respondents were not from the proximity of the Ashley National Forest, that may explain how the mindset of the Russell respondents differ considerably from that of the Krannich respondents.**

189 Key tribal resources and relevant habitat types are identified in table 3-53, in “Areas of Tribal Importance.” **Table 3-53 is entitled “Minority and Low-Income Populations within the Socioeconomic Plan Area (2018)”. Areas of Tribal Importance don’t seem to be included in this table.**

197 There are numerous commercial fuelwood operations and five sawmills that process timber in the economic analysis area, as detailed in “Timber.” **Page 186 states that there are seven local sawmills rather than five.**

199 Table 3-57. Recreation Experiences Matrix **The following recreation usage should be recognized in the DEIS:**

**Families use Destination Recreation Areas (see Tables 3-60, 3-61 & 3-62), General Recreation Areas, Trails with Mechanized Access, and Trails with Motorized Access.**

**Large Groups use Trails with Mechanized Access and Trails with Motorized Access.**

**Hunters use Remote areas with low use.**

**Anglers use Destination Recreation Areas, Backcountry Recreation Areas and Developed Recreation sites.**

**Mountain Bikers use Destination Recreation Areas and Backcountry Recreation Areas (see Tables 3-60, 3-61 & 3-62)**

**OHV users use Developed Recreation sites and Backcountry Recreation Areas where there are existing motorized routes (see Tables 3-60, 3-61 & 3-62).**

**Cultural and Historic Site visitors use Trails with Mechanized Access and Trails with Motorized Access to reach these sites.**

**Environmental Justice populations also use Trails with Motorized Access.**

202 Overall, oil and natural gas prices have dropped significantly since much higher levels seen earlier this decade. **This statement needs to be updated to reflect the recent rebound in energy prices from the historic lows in 2020 due to travel and gathering restrictions associated with the COVID 19 pandemic.**

203 Under all alternatives, grazing on National Forest Service lands will continue to represent only minor contributions to the ability of the traditional use to continue in the area, particularly for cattle grazing. **This statement seems to conflict with a statement on Page 247, which reads: “Although typical operators depend only partially on public lands to sustain their livestock, forage sources on Federal lands still represent a critical part of grazing operations.” The County feels that the statement on Page 247 is accurate and the statement on Page 203 is not.**

204 The lack of quantitative objectives for vegetation treatments under alternative A, **and the limitations on vegetation treatments under alternative C** however, would limit the ability to achieve forest-wide changes.

207 This would limit any impacts on environmental justice, **elderly and mobility disabled** communities related to their ability to use preferred recreation sites; it also would minimize constraints on time and costs to travel to recreation.

210 Additional recommended wilderness areas could result in site-specific impacts on the access for recreation and the type of recreational uses available, which may disproportionately affect environmental justice, **elderly, and mobility disabled** communities in terms of costs for access.

213 Overall, alternative C would still decrease the potential for uncharacteristic wildfire and subsequent adverse impacts on water quality, as compared with Alternative A **however, to a lesser degree than alternative B, due to the restrictions on active vegetation management.**

213 Under alternative C, reduced mechanical treatments and reliance on natural processes would reduce short-term impacts from treatment **but provide reduced long-term benefits on ecosystems when compared to alternative B.**

213 Exposure pathways—Impacts under alternative C would be similar to those described under alternative B. Due to a reliance on natural processes, short-term impacts from use of prescribed fire would be reduced compared with other action alternatives; however, emissions would occur from use of managed wildland fires. **Under alternative C, the risk of uncharacteristic wildfire and associated health impacts from emissions would be greater than under alternative B due to the restrictions on active vegetation management in alternative C.**

215 This would limit impacts on access for environmental justice, **elderly, and mobility disabled** communities.

234 Surface-disturbing activities are associated with economic uses of the Ashley National Forest **and may lead to the discovery of previously unknown cultural resources.** However, Cultural cultural resources can be directly affected during surface disturbance by the modification, displacement, and loss of artifacts, features, and middens, resulting in the loss of valuable cultural resource information on the site function, date of use, subsistence, past environments, and other research questions.

241 The lack of natural fire **and the implementation of passive forest management policies** over a century has led to timber stands that are increasingly dense with older trees, and thus more susceptible to insects and disease. Historical fire suppression **and passive forest management** has led to conditions that may have increased the frequency and scale of native bark beetle outbreaks, which can lead to cascading effects on soil, water, and wildlife.

242 The combination of fire suppression, **passive forest management** and insect infestation has also resulted in stand conditions that are potentially more susceptible to high-intensity wildfires.

249 Factors affecting livestock operations and range management on the Ashley National Forest are largely based on market demand for livestock and rangeland conditions, both of which are based primarily on forage availability. **The market demand for livestock is based on consumer preference rather than forage availability.**

251 Fugitive dust can increase the incidence of dust pneumonia and also reduce the palatability of forage **in the short-term, until precipitation or winds remove the dust.**

254 Treatments on 1,500 acres of the Ashley National Forest annually (1,200 acres in the second decade) would affect grazing operations through changes in grazing systems; however, these types of management are generally planned around grazing rotations to minimize impacts on grazing operations. **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,500 acres of treatments in the first year and 1,200 acres in subsequent years).**

255 Treatments on 1,000 acres of the Ashley National Forest on an average annual basis (800 acres on an average annual basis in the second decade), ... **This acreage of treatments**

is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,000 acres of treatments in the first year and 800 acres in subsequent years).

256 Treatments on 1,600 acres of the Ashley National Forest annually (1,300 acres in the second decade) would affect grazing operations through changes in grazing systems; ... **This acreage of treatments is inconsistent with the acreage of treatments indicated in Table 3-67 (i.e. 1,600 acres of treatments in the first year and 1,300 acres in subsequent years).**

263-264 An act of Congress is not a reasonably foreseeable action, so environmental consequences on leasable and locatable minerals are expected to be the same as under alternative A. **Even though it cannot be predicted whether Congress will officially designate additional wilderness areas under alternatives B and C, even if these areas are left for a long period of time as recommended wilderness or wilderness study areas, management will preclude any land use that would impact wilderness characteristics. Thus, the environmental consequences for leasable and locatable minerals will be different than under alternative A.**

292 Managing for natural-appearing scenery is important to the public. **This blanket statement may not be accurate. There are certain areas of the forest where natural-appearing scenery is important, but other areas, such as in the current Partial Retention or Modification VQO areas, where modifications of scenery would likely be acceptable to the public.**

298 The Forest Service would annually consider and prioritize easements identified and agreed upon by state and county governments and private landowners, for providing access to the national forest. This would provide the Forest Service with more opportunities to plan for changes that affect the visual character, compared with alternatives A **and C.**

299 Within the Ashley National Forest's boundaries, landownership (containing surface and subsurface) includes public lands managed by the Forest Service, private inholdings, and Utah State lands **and subsurface mineral resources owned by ??????**

299-300 Land status is determined by legal regulations, restrictions, and permissions on how the land is used or managed for use, including planning, zoning, easements, and other legal designations. **County zoning ordinances and zoning maps do not apply to USFS lands, but they do to inholdings.**

300 Under the land adjustment programs, the Forest Service acquires and consolidates key tracts of non-Federal land to conserve valuable natural habitat, reduce the risk of permanent development in sensitive areas, and enhance public recreation opportunities. **The plan should also state that, under the land adjustment programs, the Forest Service may dispose of lands no longer needed to meet Forest Service objectives.**

313 Of the four eligible segments evaluated in the suitability study, none were determined to be suitable for inclusion in the National Wild and Scenic River System in the preliminary

suitability determination. **Then why are they being proposed for designation under alternative C?**

316 Under all alternatives, there would be no changes to the FGNRA, scenic byway miles, national recreation trails, geologic areas, or wilderness areas. These areas would continue to be managed according to the enabling legislation for which they were designated. **How can this be true when alternatives B and C would establish additional potential wilderness areas that would be managed to protect those wilderness characteristics?**

### Comments from Uintah County USU Extension Office

Forest-wide grazing guidelines are inflexible

Alternative B and C include adopting Forest-wide guidelines to limit grazing to 50% (Alternative B or D) or 40% utilization (Alternative C) and 4 inch stubble height. While Forest-wide guidelines might be easier to implement, adopting them reduces the flexibility of managers to adapt grazing plans to real resource concerns.

Bighorn Sheep

Bighorn sheep were removed from Utah's SGCN (list of species with greatest conservation need) in 2021. The justification given by Utah DWR was the reassessment of socio-economic factors resulted in this species no longer meeting SGCN inclusion criteria. The new Forest Plan should not include more restrictive policies towards domestic sheep and goats than the previous plan. Grazing by domestic sheep and goats instead of only cattle would be healthy for the range. See Walker, J. 1994. "Multispecies Grazing: The Ecological Advantage." Sheep Research Journal Special Issue 52-64.

Understatement of the impact to the Beef Cattle Industry of grazing on the Ashley Forest

On page 203, the document states that Ashley Forest supports 5 percent of the cattle in the area based on the portion of Head-Months(HM) divided by the total number of cattle and calves in the 2017 inventory for four counties in the area. Using the cattle inventory for the counties of Daggett, Duchesne and Uintah Counties more accurately addresses the importance of grazing on the Ashley Forest to the local beef industry, which is the relevant sector of the cattle industry to the plan. Head-months in the case of cattle is the number of wean-animal months and includes a cow and her unweaned calf. But the numbers used in the estimate of support includes unweaned calves. A high portion of the beef animals grazing on the forest are cow-calf pairs. Therefore, a more accurate estimate of the impact to the Beef industry would use the number of weaned beef cattle as the denominator. That number isn't given in the 2017 inventory but can be estimated by taking the number of all cattle and calves and subtracting milk cows and 85% of the number of beef cows (an estimate of the number of unweaned beef calves). Using these figures, the Ashley Forest allotments support about 12 percent of the beef cattle in Daggett, Duchesne and Uintah Counties.

## Conclusion

Uintah County is grateful for the opportunity to make comments on this forest plan revision. Based on our analysis of the DEIS Alternative D best represents policies found in our RMP. We are hopeful that our comments will be helpful in the DEIS process and as a decision is made and a new forest plan is adopted. Please reach out if you have any questions or if you would like more clarification.

Respectfully,

  
Brad Horrocks, Commissioner

  
William Stringer, Commissioner

  
Bart Haslem, Commissioner

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