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Comments on Draft EIS Ashley National Forest

Submitted by:

Uintah County Cattlemen's

Uintah County Farm Bureau

Uintah County Cattlemen's Association/Uintah County Farm Bureau

2/10/22

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

Subject: Ashley National Forest Plan Revision Draft EIS
Comments and concerns from the Uintah County Cattlemen's Association

Dear Supervisor, Eickhoff

The Uintah County Cattlemen's Association/ Uintah County Farm Bureau appreciates the opportunity to comment on and address concerns with the draft EIS. We hope you will find these comments and recommendations useful and important.

As Cattlemen/ Women and Agriculturalist of Uintah County the ability to access resources from the Ashley National Forest is critical. The lands within Uintah, Daggett and Duchesne Counties are largely owned by the Federal Government. Without access to resources on public lands the ability to operate successful agricultural operations in this area would be impossible. Not only is the grazing on public land vital but the water resources generated on public lands are essential for growing crops. The renewable resources from the Ashley National Forest have been a critical economic and cultural driver for local society. The members of the Uintah County Farm Bureau and Uintah County Cattlemen's Association produce \$42.2 million worth of agricultural products as of 2019. Nearly all the production is dependent on the renewable resources derived from the Ashley National Forest via water resources and grazing.

Concerns:

- 1) Many of the alternatives within the DEIS do not adequately recognize or parallel the local resource management plans (RMP). State and local governments have developed these plans to address local historic, cultural, ecological and economic impacts. These plans should be carefully considered and paralleled.
- 2) Wilderness and Wild and Scenic River Designation: Some of the alternatives in the DEIS are extreme in the approach to designating wilderness or wild and scenic rivers. While some areas may be appropriate for designation, the large areas proposed in some of the listed alternatives are inappropriate. Often, the lack of proper management in these designated areas leads to catastrophic wildfires and watershed degradation. Within some of the proposed designations exists structures that are critical to the local population. The ability to access these structures in a timely and cost-effective way must be maintained. For example, many of the beautiful reservoirs within the Ashley that people and wildlife enjoy were created by our forefathers. Therefore, the historic right-of-way access to these structures and the ability to maintain, improve and construct new structures if required must be recognized. The Cattlemen's association/Farm Bureau believes the nearly 1,000,000 acres already designated wilderness or roadless area within the Ashley are sufficient, the addition of more acreage would be inappropriate.

- 3) Timber Harvest: Many of the alternatives listed in the DEIS do not properly address management flexibility to properly maintain a healthy forest. There are many areas within the Ashley that could and should be opened for timber harvest. Many of these areas are ripe for a catastrophic wildfire that would potentially cripple many uses including local culinary water systems. Many of the previously timbered areas that were enjoyed by wildlife, recreation and livestock have been allowed to regrow with small dog-hair pines that are so thick a person cannot walk through them. These areas are no longer viable for the wildlife, people and livestock that once enjoyed these areas. The lumber industry on the Ashley was once a viable industry for the local economy and helped improve the ecological condition of the forest. The Cattlemen's Association/Farm Bureau believes the timber management on the Ashley has not been appropriate for the health of the forest and for the protection of vital resources. The Forest management plan needs to incorporate larger parameters and flexibility for timber management.
- 4) Grazing: The Uintah County Cattlemen's Association/Uintah County Farm Bureau believes that most of the alternatives listed in the DEIS are too restrictive and lack the flexibility to properly manage forage and water resources for ecological, cultural and economic sustainability. As range conditions change, from year to year and season to season, the need for a flexible management plan is crucial. Site specific management is the best practice for managing grazing lands. As vegetation and water resources are so varied across the Ashley, a blanket management plan is not appropriate. The language in the DEIS concerning grazing in wilderness areas and the possible impacts to grazing are concerning. Possible restrictions on access and reduction in grazing from historic levels are unacceptable unless substantial evidence shows restrictions are necessary and there are no other mitigation measures available. The grazing management plan on wilderness within the Ashley should be in accordance with the Committee on Interior and Insular Affairs of the Representatives accompanying H.R. 5487 of the 96th Congress (H. Rept. 96-617). Most other wilderness areas are managed in accordance with this report. The language in the DEIS that restricts use to 40-50% and a stubble height of 4-7" is not compatible to the conditions on the Ashley. There are many areas on the Ashley that never have and probably never will reach the 4-7" even without the impacts of grazing. The Cattlemen's Association/Farm Bureau encourages the Forest service to adopt an alternative that incorporates language that does not set stringent use tables but encourages more site-specific data. Any alternative adopted should allow for a potential increase in livestock grazing if conditions permit and an increase in available forage should be equally allocated between livestock and wildlife. The language on page 203 of the DEIS is not accurate. The ability of grazers to access public lands on the Ashley and throughout the west is a major contributor to the sustainability of their livestock operations. The formula used to derive the impact was incorrect. The formula was corrected by the USU extension in their comments that were incorporated with Uintah Counties comments. Due to the large amount of land controlled by the federal government in the west private grazing land is limited. Vegetation management projects proposed in the DEIS that affect grazing should be accomplished in a way to minimize the impacts on grazing. An alternative should be adopted that would allow for the grazing of areas that were historically grazed, that are no longer grazed, that could be incorporated when vegetation projects or wildfire have affected grazing in other areas.

Conclusion: The Uintah County Cattlemen's Association/Uintah County Farm Bureau supports continued multiple use of the Ashley National Forest. We believe the DEIS in many areas understated the important impact the Ashley has on livestock, agriculture and all

other industry in the Uintah Basin. Agriculture/grazing has been a historical, cultural, and economic driver in the Uintah Basin, and this continues to be the case today. Our forefathers constructed many of the roads, trails and water infrastructures that exists on the Ashley. They did so without government resources and support. Rather, they used their own resources at great personal expense. We are beneficiaries of their sacrifice. Any effort by the U.S. Forest Service to diminish multiple use is contrary to the culture, traditions and heritage of the Uintah Basin. The Uintah County Cattlemen's Association/Uintah County Farm Bureau believes with proper management the ecological health of the Ashley can be improved while maintaining the variety of uses the people of the Uintah Basin enjoy.

The Uintah County Cattlemen's Association/Uintah County Farm Bureau also support the comments and language changes submitted by Uintah County.

Thank you for considering our comments and recommendations we hope you will find them useful and constructive.

Thanks again,

Ritchie Anderson

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