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Final Environmental Impact Statement for Management of the High Uinta Wilderness

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Intermountain Region
Ashley and
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Final Environmental Impact Statement

for Management of the High Uintas Wilderness

ENVIRONMENTAL IMPACT STATEMENT FOR MANAGEMENT OF THE HIGH UINTAS WILDERNESS

USDA - Forest Service
Ashley and Wasatch-Cache National Forests

Duchesne and Summit Counties, Utah

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Abstract: The Final Environmental Impact Statement analyzes four alternatives to amend the Ashley and Wasatch-Cache National Forest Land and Resource Management Plan (Forest Plan) to include Desired Future Condition for mapped Condition Classes with accompanying indicators and standards for the High Uintas Wilderness. The No Action Alternative is analyzed in depth also. Significant issues considered include effects of human overuse on ecosystem components, the extent visitor experience is impacted by rules and regulations, the extent visitor solitude is impacted by other users, structures and resource impacts, the extent trails meet wilderness objectives, the threat of human and animal waste to water quality, the threat of non-native plant species on the ecosystem, effects on threatened, endangered and sensitive species, effects on air quality, the extent fire plays a natural role in the ecosystem, effects on archeological and historic sites, effects on Research Natural Areas, and the effects of stocking fish on aquatic natural processes.

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INTRODUCTION

The Ashley and Wasatch-Cache National Forest Land and Resource Management Plans guide all resource management activities for these Forests Forest Plan decisions are programmatic in that they set a framework within which project level decisions and actions can be undertaken Project level decisions require a second level of analysis prior to decision making and implementation of the project activity

This Environmental Impact Statement has been developed to enhance programmatic direction for the High Uintas Wilderness which is managed jointly by the Ashley and Wasatch-Cache A proposed action is presented in Alternative 1, as are four other alternatives including continued management under current direction from the Forest Plans Each alternative sets a general framework for future project level decisions for the High Uintas

PURPOSE AND NEED

Both Forest Plans were approved in the mid-1980s They were developed independently and based on information and wilderness management concepts popular at that time The purposes of this analysis are to provide consistent, updated direction in the two Forest Plans through the provision of new desired future condition statements and standards for the High Uintas

At the time the Forest Plans were originally prepared, most Wildernesses were managed primarily for the recreational benefits they might provide While this is still a major focus for wilderness managers, it is now recognized that the sustenance of wild ecosystems for values other than those more directly related to human uses should also be a paramount consideration This analysis and the decisions that fall out of it fulfill a need to articulate this shift in national policy for wilderness management in the High Uintas

DECISIONS NEEDED

The Ashley and Wasatch-Cache Forest Supervisors are the officials responsible for deciding which alternative will be selected The following decisions will be made on whether or not to

- Define "desired condition" statements for certain classes of wilderness lands and allocate lands to these classes within the High Uintas Wilderness, and
- Define standards for the limits of acceptable change within the High Uintas Wilderness, and

- Define the monitoring requirements for the High Uintas Wilderness

PROPOSED ACTION

Alternative 1, the proposed action, provides "desired condition" statements for three classes of wilderness lands in the High Uintas Wilderness. The statements are intended to create general images for managers to work toward and for users to understand regarding the intended setting for these areas.

Additionally, the proposed action allocates certain areas of the High Uintas to these three desired condition classes, so that 23% of the wilderness area is in Class I, 68% is in Class II, and 9% is in Class III.

Alternatives (other than the no action alternative to manage under existing direction) vary by the amount and distribution of wilderness area allocated to each of the three desired condition classes, while keeping the same standards for the classes across all action alternatives.

ISSUES

Based on public scoping and internal consideration by a Forest Service professional interdisciplinary team, the following issues were determined to be the most significant to the analysis and were used to differentiate between alternatives.

1. Human overuse threatens the integrity of ecosystem components such as riparian areas, wetlands, lakes, streams, topsoil, and wildlife and threatens potential for reintroduction of extirpated species.

2. Extent visitor solitude and primitive recreation experience are affected by other recreationists, resource damage and rules and regulations.

3. Extent outfitting and guiding (O/G) operations are affected by use limits and desired conditions (Class I-III designations).

The following issues were considered to be within the scope of the analysis, and were tracked and discussed through the analysis. However, they were not pertinent to developing a range of alternatives, nor did they vary meaningfully among alternatives.

4. Extent system trails (including signs and bridges) meet wilderness objectives including: soil and water quality, and other indicators of pristine character. In some areas trails are inappropriate, they duplicate destinations, are poorly placed and/or are insufficiently maintained.

5. Human and animal waste threaten water quality.

6. Exotic (non-native) plant species threaten natural functions of the ecosystem.

7. The extent to which habitat and populations of native, endangered, threatened, proposed and Forest Service sensitive species of fish and wildlife are protected by wilderness management measures.

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8. The extent to which air quality is affected by pollution and management ignited prescribed smoke.

9. Extent fire is allowed to play its natural role in the ecosystem.

10. Archeological and historic sites.

11. Research Natural Areas (RNA).

The following several issues were identified, but were judged to be outside the scope of the analysis, outside legal limits to consider, outside the authority of the Forest Service to administer, or not necessary to build a reasonable range of alternatives.

i. Livestock grazing within designated wilderness.

ii. Predator control.

iii. Fish stocking in wilderness.

iv. Recreational hunting, wildlife and Colorado cutthroat trout preserves.

v. Enforcement of laws and regulations.

vi. Water rights, stabilization of dams and hydrometeorological data collection sites.

vii. Reserved mineral estate.

viii. Overflights.

ALTERNATIVES

Five alternatives are provided in the Draft Environmental Impact Statement. These alternatives, except for the no action alternative (continuance of management under existing direction from the Forest Plans) simply vary by the amount and location of areas allocated to each of the three desired condition classes.

LAC Process. The nationally recognized Limits of Acceptable Change (LAC) process was used in the development of the alternatives in this analysis. This process recognizes that there is value to management and visitors in defining different desired future classes within wilderness and zoning wilderness to provide a variety of potential experiences and settings. Also LAC promotes setting standards or limits beyond which change is no longer tolerable to human experience or damaging to the non-human setting. Measurable indicators for the standards are set to monitor biological as well as cultural trends related to the desired future definitions.

Alternatives eliminated from detailed consideration. During the wilderness planning effort, a group of interested citizens volunteered to develop some information on desired future condition classes for the High Uintas. The citizens were also asked to provide maps on how they might subdivide the wilderness into various classes. While their maps were reviewed for ideas by the ID Team in developing Alternatives 1 through 4, none of their maps has actually been used as one of the alternatives given detailed consideration in this analysis.

Alternatives given detailed consideration. Detailed consideration was given to Alternative 1 (Proposed Action), Alternatives 2 through 4, and Alternative 5.

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continuance under existing Forest Plan direction (No Action)

Alternative 1 (Proposed Action). This alternative maintains current conditions across the wilderness except in Naturalist Basin and the west end of the Highline trail, where it directs managers to bring that area up to wilderness standards

Alternative 2. This alternative responds to comments claiming the other alternatives were too restrictive It is the alternative with the least restriction/highest human use potential

Alternative 3. This alternative is designed to maximize pristine character of the wilderness

Alternative 4. This alternative is designed to maintain pristine character, while allowing for some increased human use

Alternative 5 (No Action). This alternative represents no change from existing management direction Management of the High Uintas Wilderness continues as prescribed in the Wasatch-Cache and Ashley national Forests Land and Resource Plans

Direction Common to All Action Alternatives (Alternatives 1-4). Direction common to all action alternatives is the proposed management direction that does not vary by any of the action alternatives This includes criteria to be used in issuing outfitter and guide permits, wilderness-wide and Class-specific desired future conditions, and standards and indicators for each Class

An important step in wilderness planning is defining the desired condition of the wilderness resource and of each Class within the wilderness The desired condition is interpreted from the 1964 and 1984 Wilderness Acts and regulations Indicators and standards established for these desired conditions are management tools They are used to indicate when an area is achieving desired conditions, or whether management actions need to be implemented to mitigate or negate actions that degrade wilderness character

Desired Conditions Wilderness-wide. An important step in wilderness planning is defining the desired condition of the wilderness resource and of each Class within the wilderness The desired condition is interpreted from the 1964 and 1984 Wilderness Acts and regulations

The High Uintas Wilderness is recognized as an important component of the National Wilderness Preservation System

Bio physical. Air quality meets Federal and State standards There is no measurable disturbance to water chemistry or biotic components due to acid deposition There is no measurable degradation to water quality Stream and river channels are naturally appearing and are maintained by natural flow conditions The ability of soils to support naturally occurring vegetation communities is not significantly impaired by human activities

Plant communities, including riparian communities, are affected by natural processes, and maintain their natural appearance Bare soil conditions may occur

due to natural processes Viable populations of indigenous High Uinta plants are sustained, with emphasis given to threatened, endangered and sensitive (TES) species The mosaic of plant communities contributes to overall biodiversity
Fire is one of the primary natural ecological processes serving an integral role in the maintenance of the wilderness ecosystem The wilderness ecosystem is allowed to be highly dynamic, evolving over time Smoke is part of the natural fire process and is seen in the wilderness and in adjacent areas

Wildlife and fish are recognized as an integral part of the wilderness and contribute significantly to overall biodiversity Natural processes and the forces of natural selection determine the diversity of wildlife and fish habitat and species Wildlife transplants are limited to indigenous species and considered only when a vacant niche has been identified Where potential exists for a transplant species to migrate into adjacent management areas, the impacts are included in the environmental analysis Re-establish indigenous species classified as sensitive The High Uintas Wilderness acts as a component to maintain indigenous species presently existing in the area

Social. Cultural and historic sites are recognized as an integral component of the wilderness resource Past human uses of the landscape are understood Values of cultural resources sites are preserved

Livestock grazing is recognized as an appropriate use of Wilderness Results of livestock grazing are consistent with desired condition of water, soils, wildlife and vegetation

There are opportunities for public use, enjoyment and understanding of the wilderness, through experiences that depend upon a wilderness setting Outstanding opportunities for solitude or a primitive and unconfined type of recreation exist An appropriate mix of outfitters and guides are needed to assist in managing and protecting the wilderness resource and provide for the well-being of visitors to the wilderness

Visitors find clean water and air, and indigenous fish, wildlife and plant species Visitors may encounter signs of fire, including smoke, and they are aware of the natural role of fire in wilderness Smoke from fire may impair visibility Historic and pre-historic cultural resources may be discovered Visitors may encounter administrative personnel Trails provide recreation access while protecting wilderness values Results of recreation, including hunting, fishing and commercial recreation*, are consistent with the desired conditions for soils, water, vegetation, wildlife and fish habitat and social conditions

Established permitted irrigation impoundments and hydrometeriological measuring devices are authorized and appropriate uses in this wilderness They are maintained and monitored using minimum tool concepts As opportunities arise, relocate water use and prediction functions outside the wilderness Stabilize and rehabilitate decommissioned reservoirs at a level that more naturally reflects the preconstruction conditions, allows natural stream flow processes to re-occur and at a level that poses no hazard, requires no maintenance or inspection, and requires no permit

Wilderness dependent research, including Research Natural Areas (RNAs) is appropriate and encouraged. Scientific values of the HUW are recognized.

Outfitting and Guiding Criteria. The following criteria will be used in issuing and evaluating outfitter and guide permits and service day allocations.

Criteria A: Ability to accomplish environmental and land stewardship education and interpretation goals.

Criteria B: Ability to accomplish resource protection and other National Forest goals (i.e. trail maintenance/construction and rehabilitation, and campsite rehabilitation and re-location).

Criteria C: Service Days actually used as compared to service days authorized. This may reflect either an increase or decrease in authorized service days. For example, an outfitter may be authorized 200 service days per season, and for 3 years running, use only 100 service days. Unless there are extenuating circumstances (weather, fire closure, business changes hands in middle of season, etc.), this indicates less citizen need for commercial outfitting services and would result in a decrease in authorized service days. Or, an outfitter may be authorized 200 service days and for three years running their actual use bumps this limit. At this point the outfitter can request more authorized service days if there are service days available in that drainage (refer to service day ceiling), and documentation is presented on how they meet these criteria.

Criteria D: Documented citizen requests over time for particular commercial services.

Criteria E: Ability of the agency to monitor existing permits for compliance with the forest plan and special use permit requirements. This may include:

- Self-monitoring of operating plan requirements (i.e. permittee evaluation of higher use areas using photographs, campsite monitoring, etc.).
- Agency budget allowance for proper and effective administration and monitoring of outfitter permits.

Criteria F: Lakes and trail corridors in Duchesne River, Henrys Fork, Smiths Fork and East/Stillwater Forks of the Bear River drainages are the least appropriate for outfitting operations because the current public use meets or exceeds the desired conditions for that area.

Criteria G: Outfitter knowledge of area, safety, equipment and quality of business and customer service.

- Guides' knowledge of the High Uintas, including years and type experience in the business.
- Safety practices and training.
- Condition of stock, tack and camping equipment.
- Client evaluations of service and use of generally accepted accounting and business practices.

Desired Condition Classes. Desired Condition Classes are applied as a means of acknowledging diversity in use patterns and user behavior. Establishing varying classes in the wilderness, allows management to use specific strategies for specific sections of the wilderness. Defining these classes provides managers with a tool to enhance the protection of wilderness. The kind and intensity of management varies based on the desired condition.

DESIRED CONDITION CLASS I

The area is characterized by an unmodified natural environment. Human induced change is temporary, minor and less than in Class II and III. Soil compaction and minor vegetation loss associated with human related activities are temporary, discontinuous and limited in extent to the area of activity. Human induced changes to soils, water and air quality, wildlife habitats, natural fire regimes, and vegetation do not disrupt the continuity of natural processes within the watershed.

By managing the area to maintain very low use levels, outstanding opportunities for solitude or a primitive and unconfined type of recreation are available for the visitor who accepts the responsibility to travel in small groups, practice excellent wilderness ethics, use orienteering skills and spend extra effort to leave no trace. There are few if any system trails. Appropriate and properly designed system trails that pass through Class I are considered corridors and are maintained. Encounters with other groups and rangers are rare. Both the outfitted and general public disperse use, and practice and provide others with examples of leave no trace camping techniques. Regulations are communicated to visitors primarily outside the wilderness. Few direct contacts by wilderness rangers are made, unless needed to monitor conditions or address problems.

Generally, Class I is defined outside permitted livestock allotments, except areas within allotment boundaries that are unsuitable, vacant or unused (due to physical barriers or quality of forage). Lakes are generally not stocked with fish.

DESIRED CONDITION CLASS II

The area is characterized by predominately unmodified natural environment. Some human induced change is evident but will recover. Soil loss, compaction and minor vegetation loss associated with human related activities are discontinuous and limited in extent to the area of activity. Human induced changes to soils, water and air quality, wildlife habitats, natural fire regimes, and vegetation do not disrupt natural processes within the watershed.

Outstanding opportunities for solitude or a primitive and unconfined type of recreation exist. Compared to Class III, fewer areas of concentrated visitor use occur. In areas of concentrated human use, dead and down firewood is available but may be scarce. Developed, maintained and signed trails exist. Encounters with other groups, rangers and wilderness ranger camps are less than Class III but more than Class I. Both the outfitted and general public practice leave no trace camping techniques. Where regulation is needed to prevent deterioration of the

wilderness resource and visitor experience, it is communicated to visitors primarily outside the wilderness and on-site Permitted livestock grazing and fish stocking may occur

DESIRED CONDITION CLASS III

The area is characterized by a predominantly unmodified natural environment Impacts could persist from year to year Soil loss, compaction and minor vegetation loss associated with human related activities are discontinuous and limited in extent to the area of activity Human induced changes to soils, water and air quality, wildlife habitats, natural fire regimes, and vegetation do not disrupt natural processes and are not significant within the watershed

Concentrated use is more common than in Class II, but is managed to augment opportunities for solitude or a primitive and unconfined type of recreation During peak season and at popular sites, outstanding opportunities for solitude are more limited than in Class I and II In more popular campsites, dead and down firewood may be unavailable Well maintained and signed trails aid visitors Encounters with other groups, rangers and wilderness ranger camps are more common than in Classes I and II Both the outfitted and general public practice leave no trace camping techniques Where regulation and management actions are needed to prevent deterioration of wilderness resources and visitor experience, it is communicated to visitors both outside the wilderness and on-site Permitted livestock grazing and fish stocking may occur

Visitors may come in contact with water impoundments or hydrometerological measurement devices Repair, reconstruction or stabilization of water impoundments and associated activities (borrow sources, access roads) is performed so the ability of soils to support naturally occurring vegetation communities is not diminished

AFFECTED ENVIRONMENT

The affected environment includes the biophysical, social, and economic environments included in and closely related to the High Uintas Wilderness in northern Utah This 460,000 acre wilderness was designated by Congress in 1984 by the Utah Wilderness Act

The area is a rugged east-west trending mountain range with elevations ranging from about 8500 to over 13000 feet Forests of lodgepole pine, spruce-fir and aspen are common in lower elevations while unforested ridges of multi-colored quartzite and shales separate the wilderness into large scenic independent drainage basins

Hundreds of lakes dot the basin bottoms and range from small ponds to a few with surface areas over 50 acres These are a major attraction to visitors and key aquatic habitat for many species of fish and other non-vertebrate species

STANDARDS AND MONITORING REQUIREMENTS

Table S.1 Measurable limits of acceptable change in order to maintain or move toward the desired conditions.

Resource	Indicator	Standard	Monitoring Plan	Rationale
Air Quality	Deposition	*All Classes*: Nitrate and Sulphate loading will not exceed 1.5 kg/hectare yr and five kg/hectare yr, respectively.	One to three deposition sites near lake sites (see monitoring sites for surface water chemistry)	Nitrates and sulphates can contribute to acidification and promote submerged vegetation growth, high oxygen demands and high potential for winter fish kills in high mountain lakes.
	Standard Visual Range	*All Classes*: Long-term visibility impairment from human activities will not impair long term baseline visual range more than 10% of the 90th% ile (clean days) in Class II wilderness airsheds. Short-term (14 day) visual range impairment from human activities outside the wilderness such as Rx fir smoke will not reduce pre-activity visual range more than 20% in Class II wilderness airsheds.	Visual monitoring near Mill Park. Smoke emissions modeling.	Monitoring of Standard Visual Range will allow detection of air quality impacts that threaten to be long term or permanent. In the Clean Air Act (CAA), Congress established visibility as an Air Quality Related Value (AQRV) and set policy. USFS, NPS, and EPA surveys indicate that visibility (clean air distant views) is a national treasure on public lands in which citizens expect to be protected, maintained, or improved. The CAA and Wilderness Act hearings further demonstrate that visibility is a national concern, goal, and priority.
	Surface Water Chemistry (pH, alkalinity, cations, anions)	*All Classes*: Alkalinity will not be reduced more than 10% of the baseline in all surface waters. State of Utah water quality standards for pH, nitrates and sulfates, as defined in State of Utah Standards of quality of the Waters of the State (Amended 1/91) Section R448-2-14.2, Numeric Criteria for Wildlife.	Monitor appropriate number of sites (presently monitoring Dean, Bluebell*, and Walk-up Lakes).	Surface waters in higher elevation watersheds have been found to be highly sensitive to acidification. Surface water pH is a direct indication of the ability of a watershed to buffer, or neutralize, acids deposited by precipitation or dust. At lower pH values, acidification becomes toxic to fish and aquatic invertebrates. Under certain conditions, nitrates can act as a fertilizer promoting excessive submerged vegetation growth, high oxygen demands and high potential for winter fish kills. * In 1999, the Bluebell site will be replaced with a lake in the Henry's Fork drainage on the North Slope.

Resource	Indicator	Standard	Monitoring Plan	Rationale
Water Quality	coliform bacteria	All Classes: State of Utah water quality standard will be met for acceptable amounts of coliform bacteria in waters for their specific beneficial uses as defined in State of Utah Standards of Quality of the Waters of the State (effective 2/94), Section R448-2-14.1, Numeric Criteria for domestic, recreation and agricultural uses	Periodic monitoring of some lakes basins to ensure implementation of and compliance with campsite setback standards (campsites at least 200 feet from water sources). Sample existing site near Henry's Fork trailhead as needed	Certain lake basins experience high amounts of human uses. This creates the potential for introduction of human or livestock waste into surface waters. Campsite setback standards, where enforced, have proven effective in reducing this potential. The State of Utah assigns "beneficial uses" categories to different streams. Appropriate standards for fecal coliform counts accompany each "beneficial use" category.
	trail placement design	*Class I*: trailless* *Class II & III*: Trails avoid wetlands	Standards adhered to during trail construction and reconstruction	Trails can be a non-point source of sediment pollution to streams and other surface waters. Trails located in these areas will inevitably effect surface water quality, subsurface water flow patterns and wetlands and riparian area function. * Where a system trail core identified on the HUW map) passes through Class I, the trail (1/4 mile corridor) is zoned as Class II.
		Class II & III: Trails avoid stream crossings where bank gradients are greater than 30%.		
		Class II & III: Trails are designed and maintained so water does not run down the trail.		
	trail switchbacks	*Class I*: trailless* *Classes II & III*: Trail switchbacks do not show signs of short-cutting. [Special Order 36 (i) R 261.55(e)]	Field observation and incident report analysis	Short cutting trail switchbacks leads to deterioration of constructed trails. Shortcuts between switchbacks can severely erode causing sedimentation of streams and irreparable damage to trails.
	camping distance from water sources	*All Classes*: Terrain permitting, campsites must be at least 200 feet from water [Special Order 36 CFR 261.58(e)]	Field observation and incident report analysis	The purpose of this order is to protect natural resources and enhance the visitor's wilderness experience. Social impacts occur when multiple groups of campers concentrate activity near "beauty spots". Camping away from lake shores will tend to reduce encounters and preserve the aesthetic qualities of lake shores--a limited and highly valued resource (Cole, 1989). In the same reference, Cole goes on to suggest there is little evidence that pollution from lake shore campsites is a serious problem. However, there maybe some place where camping close to water causes pronounced pollution. Other researchers (Taylor and Erman, 1978) speculate that some subtle changes in aquatic ecosystems may be the result of recreation activities close to the lake shore.
	bedding or tethering any recreation stock	*All Classes*: Stock cannot be tethered within 200 feet of water sources for more than two hours. [Special Order 36 CFR 261.58 (aa)]	Field observation and incident report analysis	

Resource	Indicator	Standard	Monitoring Plan	Rationale
Soil Quality	A visual determination of erosion class will indicate where soil erosion, compaction, displacement have caused significant degradation to site productivity or water quality. These standards are best applied to evaluate soils resource conditions at areas where human recreation use is concentrated: campsites, overlooks, fishing spots and trails.	*Class I*: No more than 15% of all use areas have erosion Class I characteristics. 0% erosion Classes II or III	*Classes I, III*: Periodically monitor erosion control practices on sites that exceed erosion Class I or II standards.	Erosion Class I represents resource conditions (bare soil, exposed rock) that could occur under natural variations of climate. The scientifically recognized limit for measurement variations in site condition due to natural processes is 15%. Anything more than this is consistently noticeable and measurable result of human activities and therefore unacceptable in Class I areas. Since erosion Class I conditions are a precursor to erosion Class II and III conditions, it follows that occurrence of these conditions in Class I areas is also unacceptable.
			Class I: Monitor trend in campsite condition on one drainage (or portion of) that exceeds erosion Class I or II standards, at least once every 10 years.	
		Class II: No more than 25% of all use areas have erosion Class I characteristics, no more than 15% with erosion Class II characteristics, 0% with erosion Class III characteristics.	*Classes I, III*: Periodically monitor erosion control practices on sites that exceed erosion Class III standards.	Because erosion Class I characteristics are a precursor to acceptable resource conditions associated with erosion Class II characteristics, considerable amounts will be allowed to occur in Class II and III areas. Erosion Class II represents resource conditions that are early warnings of resource degradation. Because they are not yet an indicator of permanent resource damage, certain amounts will be tolerated. The standards represent a threshold at which periodic and more frequent monitoring will occur to ascertain whether resource damages are becoming permanent. Erosion Class III represents resource conditions that are indicative of permanent resource damage and violations of State and Federal water quality standards. As such, they are an unacceptable change within the wilderness.
			Class II: Monitor trend in campsite condition on one drainage (or portion of) that exceeds erosion Class II standards, at least once every 10 years.	
		Class III: No more than 50% of all use areas have erosion Class I characteristics, no more than 25% with erosion Class II characteristics. 0% erosion Class III	*Class III*: Monitor trend in campsite condition on one drainage (or portion of) that exceeds erosion Class I standards, at least once every 10 years.	

Resource	Indicator	Standard	Monitoring Plan	Rationale
Wildlife and Fisheries	Bank erosion (for aquatic habitat)	No standard (baseline inventory has not been completed) *LAC Factor:* Once inventories are complete a rate of bank erosion will be established within the range recorded for stable reaches within similar stream types and landforms.	Monitoring plan	High mountain lake stabilization is identified as mitigation for Uinta Basin Replacement proposal under the Central Utah Project (CUP) Completion Act Authority. Loss of storage, particularly where high mountain reservoired lakes are clustered, can result in channel adjustments and loss of aquatic habitat downstream.
	Neotropical birds	No standard (baseline inventory has not been completed) *LAC Factor:* Once inventories are complete, a specific population number and species diversity will be the standard.	No monitoring plan	There is a national standardized protocol for surveying neotropical migrant birds. By monitoring neotropical bird species, results can be compared to state, regional and or national data to see if changes are local or on a larger scale. At the local level results can be analyzed to determine and compare effects of management inside and outside the wilderness.
	Habitat available for U.S. Fish and Wildlife Service listed threatened or endangered (TE) species (none as of 4/96) and Forest Service sensitive (S) species	No standard (baseline inventory has not been completed) *LAC Factor:* Once inventories are complete, a specific acreage of habitat available will be the standard.	No monitoring plan	Management of wildlife on National Forest System lands is a joint responsibility. The Forest Service is responsible for managing wildlife habitat and the State of Utah is responsible for managing species populations. In order to identify suitable habitat for potential and resident wildlife species within the wilderness, we will use GIS (Geographic Information System) to analyze [illegible]tative cover and structure. This will make it possible to design the most cost effective survey areas (in partnership with the State of Utah) to verify presence or absence of TES species (i.e. lynx, etc.) and coordinate plans for possible reintroduction of extirpated species.

Resource	Indicator	Standard	Monitoring Plan	Rationale
Vegetation	Habitat available for US Fish and Wildlife Service listed threatened or endangered (TE) plant species (none as of 3/96) and Forest Service sensitive (S) species	No more than 10% of habitat for sensitive species Papaver radicatum var. Pygmaeum and Draba densifolia var. Apiculata are not adversely altered by human uses	Monitor three populations of each sensitive plant where there is a high potential of human alteration to the habitat. Include Anderson Pass site for changes to Papaver radicatum	These plants reside on talus slopes at very high elevations. The potential for habitat alteration by human uses is very low.
	Alpine vegetation types: slopes < 10%; potential ground cover	[illegible] 85% of potential	Ground cover measurements taken at selected sites. These will reflect various use levels, including areas of little or no use, which will be used to verify potential for ground cover. Evaluations will be made on a 10-year or longer interval where slow change is indicated	Forest Service Region 4 Standard for ground cover is implied at 85% of potential as a minimum. Ground cover at or near potential is a sensitive indicator for desired plant communities as well as watershed conditions. Monitoring ground cover is direct and relatively simple, requiring only simple equipment. Training required to monitor ground cover rather than species composition is less costly. More detailed information on using ground cover as a management indicator is available at the Ashley Forest Supervisor's Office.
	Alpine types: slopes > 10%; potential ground cover	[illegible] 85% of potential		
	Aspen types: potential ground cover	[illegible] 85% of potential		
	Riparian types (away from greenline): potential ground cover	[illegible] 85% of potential		
	Riparian types (greenline*): stream bank stability	[illegible] 85% of potential (standard criteria in "Integrated Riparian Evaluation Guide")	Greenline studies conducted at selected sites. These will reflect various use levels. Evaluations made on a 10-year or longer interval where very slow change is indicated	* For stream types where vegetation has a strong stream bank controlling influence (E and others), the greenline is an indicator of resource value for fish habitat and other stream functions.
	Natural fire regime	[illegible] 100% of prescribed fires (PF) are managed so fire can play, as nearly as possible, its natural role in the ecosystem	Evaluate all PFs to verify if they are meeting wilderness resource objectives. Evaluate all natural ignitions that are declared wildfires. Determine how similar fires in the future can be maintained in prescribed natural fire (PNF) status	Restore fire to the wilderness ecosystem by developing prescriptions allowing for unplanned natural ignitions and limited use of planned ignitions to achieve wilderness resource objectives. Suppress fires that may escape the wilderness boundary only if they threaten life, property or resources. Continue fire history studies to verify frequency and size of natural fires for various forest types. Include studies in Engelmann spruce, mixed conifer and lodgepole pine dominated forest types.

Resource	Indicator	Standard	Monitoring Plan	Rationale
Vegetation	Tethering stock directly to a tree [Special Order CFR 261.52 (a)]	*All Classes.* Over two hours or sooner if damage to the tree or vegetation at the base of the tree is occurring	Field observation and incident report analysis	When stock are tied to trees for long periods, they excavate wells around the base of trees, exposing and trampling roots (McClaren and Cole 1993)
	Overnight use or grazing by recreational stock [Special Order 36 CFR 261.57 (c)]	No overnight use or grazing by rec stock in Chain Lakes basin (Uinta drainage)	Field observation and incident report analysis	Pack stock impact wilderness vegetation, soils, water, wildlife and esthetics by defoliating vegetation, trampling, depositing wastes and interacting with wildlife and with visitors. These impacts occur mainly when animals graze vegetation and when they are confined around camps (McClaren and Cole 1993)

Resource	Indicator	Standard	Monitoring Plan	Rationale
Recreation	Litter human waste [Special Order 36 CFR 261 57 (g)] I	All Classes Disposing of litter or waste in an inappropriate way	Field observation and incident report analysis	Litter is not a long-term ecological problem, however, is one of the more serious problems in the opinion of wilderness users (Roggenbuck and et al, 1982)
	Campsite density (distance between occupied campsites)	Class I 80% probability occupied campsites are one mile apart	Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years	Each desired condition class offers varying levels of expectations for solitude Expectations and assurances of solitude are higher in Class I and reduce accordingly in Class II and II areas Proximity of occupied campsites to each other is a tangible measure and indicator of solitude
		Class II 80% probability occupied campsites are 1 4 mile apart		
		Class III 80% probability occupied campsites are 200 feet apart		
	Campsite assessment rating (modified from campsite assessment rating David Cole defined in 1988)	Class I 0% campsites have an SII rating greater than 40	Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years	Site Impact Indexes (SII) are calculated from campsite inventories that rate impact data and are weighted according to ecological importance SII ratings are an indication of accumulated human use changes to the vegetation, soils, and ascetics at each campsite SII ratings above 40 indicate deleterious impacts SII ratings above 40 indicated a risk that the site will have difficulty recovering from human uses SII ratings below 40 typically indicate potential for annual recovery of vegetation, soils and ascetics Campsite inventory and monitoring in Grandaddy Basin (1992 and 1996) resulted in a spread of SII ratings of 66-26
		Class II 10% or fewer campsites have an SII rating greater than or equal to 50		
		Class III 20% or fewer campsites have an SII rating greater than or equal to 50		
	Group size	Class I seven people seven stock	Field observation and registration card analysis	Recommended group size for overnight use Cole (1987) indicates that small parties are critical to avoid the creation of new campsites and trails in little-used places
		Class II 14 people 15 stock [Special Order 36 CFR 261 58 (f)]		The purpose of this order is to protect natural resources and enhance the visitor's wilderness experience Studies indicate that most back country visitors prefer not to encounter other people, but if necessary, most visitors preferred contact with smaller rather than larger (over 10-12) groups (Stankey, 1973) Cole (1987) indicates that larger groups can also cause greater resource impacts, particularly in fragile areas or areas that have received little use
		Class III 14 people 15 stock [Special Order 36 CFR 261 58 (f)]		
	Length of stay at one campsite	Class I 1-2 nights maximum recommended overnight stay	Field observation and incident report analysis	Recommended Cole (1987) indicates that small parties are critical to avoid the creation of new campsites and trails in little-used places
		Classes II & III 14 nights at an individual site [Special Order 36 CFR 261 58 (a)]	Field observation and incident report analysis	Interpretation of the 1964 Wilderness Act, "where man is a visitor who does not remain" In addition, this prevents campers from taking up long term residence, and permits sites to be used by other visitors

Resource	Indicator	Standard	Monitoring Plan	Rationale
Recreation	Firewood availability dead woody debris in size class 0.25-4.0 inches including dead wood still attached at base of trees (ground to 7') available for campfire wood within 200' of campsites and comparable unused (control) sites	"Abundant" campfire wood: any activity area greater than or equal to seven tons/acre will be open to campfire wood gathering and campfires will be allowed regardless of intensity of recreational use (standard will be determined after baseline data is collected in 1996) *Class I*: no restrictions *Class II*: no restrictions *Class III*: no restrictions	Data is collected in activity areas along random transects to measure quantity of wood available (tons/acre) for campfires and nutrient cycling. Comparable unused areas (same species elevation slope aspect) will be sampled to determine the amount of wood potentially available for campfires. Data transects will be in camping activity areas and within 200' of at least one typical campsite.* The data collected will be evaluated to determine the proportion of potentially available wood (control sites) and actually available wood (activity areas) and a standard developed in tons per acre to allocate amount of woody debris available for campfire wood collection (in relation to amount left for nutrient cycling). The amount of woody debris available for campfires will be evaluated utilizing the methodology described in handbook for Inventorying Downed and Woody Material (Brown)	Abundant quantities of dead wood debris are available for campfires while still providing the size classes of wood most important for nutrient cycling within the ecosystem. Cutting down live trees and hacking up dead standing trees occurs only rarely because downed wood is available. No restrictions on campfire use necessary. *Classes I-III*: Visitor use level should not effect availability of small woody debris (twigs-4" branches) for nutrient cycling and campfires.
		"Acceptable" campfire wood: any activity area with greater than or equal to seven tons/acre but less than or equal to seven tons/acre will be open to campfire wood gathering and campfires allowed (standard will be determined after baseline data is collected in 1996) *Class I & II*: Wood gathering and campfires are prohibited within 1/4 mile of the activity area as soon as possible the season the standard is exceeded. *Class III*: Wood gathering and campfires are prohibited with 1/4 mile of the activity area at the beginning of the following season when the standard is exceeded.		Acceptable amounts of campfire wood are available for firewood collection and to provide sustainable nutrient cycling within the ecosystem (monitor closely to avoid reaching the "scarce to no" standard within one season). *Classes I-II*: Acceptable amounts of campfire wood are available for firewood collection and to provide sustainable nutrient cycling within the ecosystem. Cutting down live trees and hacking up dead standing trees occurs only rarely because downed wood is available. No restrictions are necessary. *Class III*: In high use areas there is not enough dead wood debris for firewood collection and to provide for sustainable nutrient cycling within the activity area. Cutting down live trees and hacking up dead standing trees occurs frequently due to lack of downed wood available for campfires. Prohibit campfires the following season. *Forest visitors typically scavenge for wood within a radius of 2-300' from their campsites (Darvilla, 1979).
		Scarce to no: less than or equal to seven tons/acre (standard will be determined after baseline data is collected in 1996) *Class I, II & III*: Wood gathering and campfires prohibited within 1/4 mile of any activity area where standard is exceeded.		Scarce to no dead woody debris available for campfires while still providing the size classes of wood most important for nutrient cycling within the ecosystem. *Class I-III*: All campfire wood collection is prohibited in affected activity area. Also prohibit campfire wood collection if visitor use displaces the effects of campfire wood collection to areas within 1/4 mile.

Resource	Indicator	Standard	Monitoring Plan	Rationale
Recreation	Campfires	In Naturalist Basin (Duchesne drainage): building, maintaining, attending or using a fire or campfire unless in a designated campfire location is prohibited [Special Order 36 CFR 261.52 (a)]	Field observation and incident report analysis	This area has been denuded of downed woody debris and many live and dead trees have been cut to supply campfires with wood, leaving a very unnatural appearance. In addition, large, decaying wood plays a vital part (soil productivity, water retention), in the environment that cannot be replaced by any other component in the ecosystem (Cole and Dalle-Molle, 1982). This regulation is most important where (1) proper fire location, construction and cleanup practices are not followed, and (2) in popular places, where firewood supplies have been depleted (Cole, 1989).
	Outfitting/guiding permits	Stock: 7* Non-stock: 4	Administration of permits	Because public need is being met, maintain current number of permits. Offer new permits only if managers recognize a public need not being met by existing outfitters. Offer vacated permits through prospectus based on O/G needs criteria. * Currently Yellowstone and Lake Fork are issued as one permit, so the total existing stock use permits equals six.
	Outfitting/guiding service days: stock use	Each alternative defines maximum authorized service days available by drainage (see description of alternatives Chapter II). Use same method as above to authorize and increase service days.	Monitor operating plans and actual use reports	Each drainage was evaluated by wilderness managers. The maximum service days per drainage were decided based on (1) mix of Classes, (2) amount of existing public use, (3) campsite potential (i.e. rocky talus slopes vs. flat ground), (4) historic outfitted use figures, and (5) margin for growth based on O/G Needs Criteria (Chapter II).
	Outfitting/guiding service days: non-stock use outfitters	Each alternative defines maximum authorized service days available by drainage (see description of alternatives Chapter II).		
	Outfitting/guiding: type camps	*Class I*: Drop camps only; no spike or assigned camps. Overnight group size limited to seven people and/or seven stock. *Class II*: Maximum one assigned site per drainage. *Class III*: Drop camps only; no spike or assigned camps.		Assigned and spike camps are inappropriate uses of Class I and III. It is the District Ranger's discretion to determine if and where assigned camps are appropriate in Class II. Drop Camp: Either client and/or gear is dropped at an appropriate campsite; uncatered. Spike Camp: Client and gear are moved to new camp either daily or less often; catered. Assigned Camp: Camp outfitted (tents, latrine facilities, etc.) to cater to successive parties of clients. The District Ranger approves and a fee is paid for this site. Camp is removed completely with no cash left behind at the end of the season. (This type camp can eliminate excessive stock use to transport camp equipment and supplies during the season.)

HIGH UINTAS WILDERNESS EXISTING CONDITIONS (1994)

South Slope

	DUCHESNE RIVER	ROCK CREEK	LAKE FORK	YELLOWSTONE & SWIFT CREEKS	UINTA CANYON
hectares (acres)	9200 (23,000)	24,828 (62,069)	25,232 (63,081)	28,981 (72,452)	29,484 (73,710)
county	Summit Duchesne	Duchesne	Duchesne	Duchesne	Duchesne
type visitor	urban	urban wme rural	rural some urban	rural	rural
visitor days (approx)	7,000	14,000	13,000	13,000	14,000
visitor attractions	easy access, lakes	easy access, lakes	50 mile hike, lakes	Kings Peak, lakes	Kings Peak, lakes
high use areas	Naturalist Basin	Grandaddy Basin, 4 Lakes Basin	Brown Duck Basin	Garfield Basin, Swift Creek	Chain Lakes, Atwood Basin
# waters (lakes, ponds, etc) / 1 surface acre	1/17				
% waters w fish	19%				
# major trails	2	5	4	5	4
type outfitting	none	stock non-stock	stock non-stock	stock non-stock	stock non-stock
# outfitted s-days (approx)	none	stock- 150 non-stock- 50	stock- 200 non-stock- 250	stock- 100 non-stock- 550	stock- 100 non-stock-400
additional rules and regs	yes	no	no	no	yes
type allotment	rec stock	sheep cows rec stock	sheep cows rec stock	sheep cows rec stock	recreation stock
# AUMs (approx)	rec stock	cows 58 rec stock 164	sheep 1362 cows 264 rec stock 164	sheep (rest) cows 249 rec stock 164	sheep 570 rec stock 164
# dams, shore sites	none	none	4 dams 1 motel	8 dams 1 motel	5 dams
# P-SAs	none	none	none	none	1

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HIGH UINTAS WILDERNESS EXISTING CONDITIONS (1994)

North Slope

	BURNT FORK	BEAVER CREEK	HENRYS FORK	SMITHS FORK	E/M/W FORK BLACKS FORK	STILLWATER & EAST FORK BEAR
Hectares (acres)	9234 (23,084)	12,342 (30,855)	5995 (14,987)	11,154 (27,884)	15,555 (38,888)	10,945 (27,362)
county	Summit, UT	Summit, UT	Summit, UT	Summit, UT	Summit, UT	Summit, UT
type visitor	rural	rural	urban	urban	rural	urban rural
visitor days/apr's	6,000	3,100	15,500	16,000	4,700	8,000
visitor attraction	lakes, hunting	easy access lakes	easiest access Kings Pk	Kings Peak lakes	lakes	lakes
high use areas	Island, Kabell Lakes, hunting camps	Gilbert, Beaver, Coffin Lakes	Bear, Sawmill, Grass, Island, Henrys Fork & Dollar Lk	Lower and East Red Castle Lakes, Hessie Lake	west bench of East Little Fork, Dead Horse Lake	Alsop, Nonce Lakes, Amethyst Basin
# waters (lakes, ponds, etc) / 1 surface acre	4/6					
% waters w fish	23%					
# major trails	4	6	3	3	5	6
type outfitting	stock	stock	non-stock	non-stock	stock	none
# outfitted s-days (approx)	stock -100	stock-100	n-s 100	n-s-100	stock -100	stock-0
further rules regs	no	no	no	no	no	no
type allotment	sheep cows rec stock	cows rec stock	sheep rec stock	sheep cows rec stock	sheep rec stock	sheep cows rec stock
# AUMs (approx)	s-vacant c-120 rec-46	s-854 c-228 rec-44	s-854 c-65 rec-50	s-858 c-1150 rec-171	s-1662 rec-42	s-421 c-90 rec-56

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	BURNT FORK	BEAVER CREEK	HENRYS FORK	SMITHS FORK	E/M/W FORK BLACKS FORK	STILLWATER & EAST FORK BEAR
# dams, snotel	1 dam	none	precip gauge aerial marker	none	none	none
# RNAs	none	none	none	none	none	none

Envi onmental Effects of Each Alternative

ISSUE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5 (No Action)
	Class I-23% Class II-68% Class III-9%	Class I-14% Class II-61% Class III-25%	Class I-40% Class II-58% Class III-2%	Class I-17% Class II-78% Class III-5%	No designation of Classes. Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts
1. Human overuse threatens integrity of ecosystem components	No threat to ecosystem function	Threat is expected to be low, but higher than for other alternatives	No threat to ecosystem function	Threat to ecosystem function is expected to be very low	Threat to ecosystem function is expected to be very low
2. Extent visitor solitude and primitive recreation experience are affected by other recreationists, resource damage and rules and regulations	Compared to Alternative 5, existing opportunities for solitude are enhanced in areas that currently do not meet Wilderness standards. However, increased regulation is likely in these areas (Naturalist Basin and west end of Highline Trail)	Compared to Alternative 5, opportunities for visitor solitude are highly threatened due to increased Class III areas. Like Alt 1, increased regulation is possible in areas moving from Class III or II to Class II or I. However, threat of increased regulation is very low.	Compared to Alternative 5, opportunities for visitor solitude are highly enhanced due to increased Class I areas and decreased Class II & III areas. Like Alt 1, increased regulation is possible in areas moving from Class III or II to Class II or I. Therefore, threat of increased regulation is higher than for other alternatives.	Compared to Alternative 5, opportunities for visitor solitude are moderately enhanced due to slightly decreased Class III areas. Like Alt 1, increased regulation is possible in areas moving from Class III or II to Class II or I. Therefore, threat of increased regulation is moderate.	The area maintains current solitude conditions, except where it is highly threatened in areas that do not currently meet Wilderness standards (Naturalist Basin and west end of Highline Trail). Increased regulation is likely in above areas to enhance wilderness qualities.

ISSUE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5 (No Action)
	Class I-23% Class II-68% Class III-9%	Class I-14% Class II-61% Class III-25%	Class I-40% Class II-58% Class III-2%	Class I-17% Class II-78% Class III-5%	No designation of Classes. Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts
3. Extent outfitting and guiding operations are affected by use limits and desired conditions (Class designations)	Minor negative economic effects in some drainages	20%-50% reduction in service days available in Yellowstone and Uinta. With redistribution, negative economic effects are minimal	8%-61% reduction in service days in several drainages. Negative economic effects are higher than for other alternatives	No negative economic effects	*Stock* - *Slope*: 2 hunting O Gs (300 service days each) *S. Slope*: 5 hunting fishing O Gs (service days limited by existing use patterns resource conditions) Education other (service days limited by existing use patterns resource conditions) *N. Slope*: no more than 2 in wilderness at one time *S. Slope*: no more than two per district at one time
	Total service days available stock 1850 n-stock 2550 4400	Total service days available stock 1475 n-stock 2550 4025	Total service days available stock 1300 n-stock 1825 3125	Total service days available stock 2050 n-stock 2950 5000	
	Maximum outfitter permits available *Stock outfitting*: no more than seven *Non-stock outfitting*: no more than four No new outfitting permits will be issued				
4. Extent system trails meet wilderness objectives	23% of area has no system trails. Increased erosion and sedimentation from trail activities is less likely than Alternative 5	14% of area has no system trails. Increased erosion and sedimentation from trail activities is most likely when compared to all other alternatives	40% of area has no system trails. Increased erosion and sedimentation from trail activities is least likely when compared to all other alternatives	17% of area has no system trails. Increased erosion and sedimentation from trail activities is less likely than Alternative 5	No system trails on approximately 23% of the acreage. Increased erosion and sedimentation from trail activities is less likely than Alternatives 2 and 3
5. Human and animal wastes threaten water quality	With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality	With enforcement of existing camping and tethering of stock at least 200' from water, threat to water quality very low, but higher than for other alternatives due to increased Class III areas	With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality	With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality	With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality

ISSUE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5 (No Action)
	Class I-23% Class II-68% Class III-9%	Class I-14% Class II-61% Class III-25%	Class I-40% Class II-58% Class III-2%	Class I-17% Class II-78% Class III-5%	No designation of Classes. Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts
6. Exotic plant species threaten functions of ecosystem by replacing native plant species	Threat of exotic plant species invading wilderness ecosystem is expected to be very low, but slightly higher levels of exotic species might be expected than with Alternatives 2,3 & 5	More Class III indicates slightly higher opportunity for exotic species invasion and proliferation than in other alternatives. However ecosystem function does not appear to be threatened	No threat to ecosystem function is expected due to decreased levels of human induced disturbance	Threat of exotic plant species invading wilderness ecosystem is expected to be very low, but slightly higher levels of exotic species might be expected than with Alternatives 3 & 5	Threat of exotic plant species invading wilderness ecosystem is expected to be very low, but slightly higher levels of exotic species might be expected than with Alternatives 1, 3 & 4
	An evaluation of vegetation in Grandaddy Basin (1974-1975) showed only two exotic species present in very small amounts and mostly restricted to along trails. No threat to ecosystem function was apparent				

ISSUE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5 (No Action)
	Class I 23% Class II-68% Class III-9%	Class I-14% Class II-61% Class III-25%	Class I-40% Class II-58% Class III-2%	Class I-17% Class II-78% Class III-5%	No designation of Classes Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts
7. Extent wildlife and fish habitat is protected	Habitat effectiveness not compromised significantly	Decrease in habitat effectiveness due to higher human use (25% Class III)	Habitat effectiveness not compromised significantly	Habitat effectiveness not compromised significantly	Habitat effectiveness not compromised significantly
	No effects on federally listed threatened or endangered species. Viability of Forest Service designated sensitive species not threatened				
8. Extent air quality is affected by pollution and prescribed fire	During prescribed burns outside wilderness, air quality may be temporarily effected				
9. Extent prescribed fire is allowed to play its role	Restore fire to the HLW ecosystem by developing prescriptions allowing unplanned natural ignitions (lightning) to achieve wilderness resource objectives. Suppress unplanned human caused fires and those fires that threaten life or property				Continue fire suppression actions
10. Extent archeological and historic resources are preserved	The alternatives are equal with respect to potential effects to archeological and historic sites. No alternative will have a significant effect on these resources				
11. Extent Research Natural Areas (RNA) are preserved	Values of RNAs are maintained under all alternatives				
	Shale Creek RNA is in Class I in alternatives 1-4. Proposed Painter Basin RNA is in Class II in alternatives 1-4				Values of RNAs are maintained
12. Extent fish stocking meets wilderness objectives	Approximately 20 lakes in Class I may qualify for change in stocking practices	Approximately five lakes in Class I may qualify for change in stocking practices	Approximately 60 lakes in Class I may qualify for change in stocking practices	Approximately 15 lakes in Class I may qualify for change in stocking practices	Undetermined Approximately 20 lakes in Class I may qualify for change in stocking practices

chapter one

PURPOSE AND NEED

Chapter I

INTRODUCTION

The Uintas Range in northeastern Utah is the longest and highest east-west trending range in the continental United States. It is a spectacular, wild and remote place, one where humans are dwarfed by 13,000 foot summits and sometimes threatened by a caprice of nature.

For a long time, people have worked and played in the High Uintas, escaping the crowds and structures of the twentieth century. Many of these local people and others around the country have generally recognized that this high alpine setting ought to remain virtually unchanged, and allowed to steer its own ecodestiny with a minimum amount of human interference.

As a result of this consensus, in 1984, 456,705 acres of the Ashley and Wasatch-Cache National Forests became the High Uintas Wilderness (HUW) through the passage of the Utah Wilderness Act (P.L. 98-428). Since 1931, 244,000 acres of this total had been previously managed as the High Uintas Primitive Area. Most of the additional wilderness acreage was designated at the eastern end of the old Primitive Area.

The High Uintas Wilderness is by far the largest wilderness in Utah, nearly ten times larger than the next largest wilderness in the state, and greater in area than all the other wilderness areas in Utah combined. Partly because of its size, but more because of its outstanding wildland scenery and remoteness, the High Uintas has been a flagship of the wildlands in the state.

This Environmental Impact Statement has been developed to analyze the proposed programmatic direction for the High Uintas Wilderness. It will disclose and compare the significant physical, biological, and social effects on the human environment.

PURPOSE AND NEED

The 1964 Wilderness Act defines wilderness as a place affected primarily by nature, where people are visitors who do not remain, and where natural ecological processes operate freely. Outstanding opportunities for solitude and primitive recreation are available. The Act states that wilderness areas "...shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness and so as to provide for the protection of these areas, the preservation of their wilderness character..."

As human use increases and the demand for this type of opportunity grows, some areas in the High Uintas Wilderness have already experienced impaired wilderness attributes. Other more remote areas are at risk for degrading existing wilderness qualities.

Both the Wasatch-Cache and Ashley Land and Resource Management Plans provide management direction for the wilderness and specific guidance to use Limits of Acceptable Change (LAC) process for wilderness planning. The Plans were approved in 1985 and 1986 respectively. At the time, these plans included accurate and contemporary guidance for wilderness management. However, perspectives and policy on wilderness management have changed significantly since the early 1980s. Now after a decade, the existing direction is outdated and insufficient to provide the needed direction to manage the High Uintas considering today's use and the effects of increasing numbers of people. There is a need to amend current direction in the Forest Plans to ensure the intent of the 1964 and 1984 Wilderness Acts is met. Additionally, each Forest Plan contains separate direction and standards for its portion of the wilderness. While much of the direction is similar, some is not, which often leads to conflicting and confusing management for employees and visitors alike. There is a need to amend the existing direction to provide clear, consistent direction for the entire wilderness.

The purpose of amending the Ashley and Wasatch-Cache Forest Plans is to provide updated and consistent direction to managers of the High Uintas Wilderness. It will direct land managers to 1) maintain a wilderness where ecosystems are influenced primarily by the forces of nature, 2) provide a diversity of opportunities for public use, enjoyment and understanding of wilderness, and 3) preserve a high quality wilderness resource for present and future generations.

PROPOSED ACTION

The proposed action amends the Ashley and Wasatch-Cache Forest Plans to provide more definitive, updated and consistent direction for management of the High Uintas Wilderness.

The proposed action divides the wilderness into desired condition classes designed to achieve desired wilderness conditions.

Class I zones are characterized by an unmodified natural environment where encounters with others are rare and human influence not evident. The proposed action allocates 23% of the wilderness to this class.

Class II zones are characterized by a predominantly unmodified natural environment where some human influence is evident (but will recover). The proposed action allocates 68% of the wilderness to this class.

Class III zones are characterized by a predominantly unmodified natural environment, however some sites are affected by the actions of users (and will take several years of non-use to recover). In Class III zones, encounters with others are common, trails are developed, maintained, and signed. The proposed action allocates 9% of the wilderness to this class.

This allocation is best represented on a map showing the High Uintas Wilderness divided into the three different classes in the alternative chapter. Specific standards and indicators are defined for each class (i.e. amount and kind of outfitted use, appropriate areas for firewood collection,

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and acceptable amounts of vegetation loss at campsites, etc.). The proposed action is represented in Alternative 1.

DECISION TO BE MADE

The decisions to be made are whether or not to amend the Forest Plans to 1) define desired condition for each Class within the wilderness and allocate portions of the wilderness to each class, 2) identify standards (thresholds) to define the limits of acceptable change, and 3) identify monitoring requirements for standards. The Responsible Officials are the Forest Supervisors of the Ashley and Wasatch-Cache National Forests.

Decisions Not Made in this Document. Congress made the determination of the lands designated as wilderness in the 1984 Utah Wilderness Act. The EIS does not re-examine the decision.

The Utah Division of Wildlife Resources (UDWR) has the legal responsibility and management authority for the fish resources of the State of Utah. As directed in Forest Service Manual 2323.34 the Regional Forester will develop a Memorandum of Understanding (MOU) with the State outlining a stocking policy for each Wilderness in the State and decisions of fish stocking wilderness lakes will be addressed in the MOU.

The decision on stocking wilderness lakes with fish will not be made in this document. However, the Forest Service's preference on where fish stocking is appropriate is expressed in the desired condition of the three Classes. Information on fish stocking is included in this document for analysis purposes.

The determination of which lands are available and suitable for grazing was made in the two Forest Plans. The EIS will not re-examine these decisions. The Forest Plan suitability decision and more recent analysis is reflected in the desired condition of the three Classes.

Decisions on how grazing allotments will be managed will be made through Allotment Management Planning in adherence to the Congressional Grazing Guidelines. Future grazing decisions will have to be consistent with new management direction in a Forest Plan amendment.

Other components of wilderness management are considered outside the scope of the analysis. They are described later in this chapter in the section and include predator control, hunting, enforcement of regulations, water rights, reserved mineral estate and overflights.

RELATIONSHIP TO OTHER PLANS

Subsequent documents, such as implementation schedules, and site-specific projects will be consistent with any new management direction and standards. Any standards decided upon from this EIS will also provide standards and desired conditions for future planning efforts, such as Allotment Management Plans.

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WILDERNESS MANAGEMENT

Policy and direction for managing wilderness is derived from several sources at the National, Department and Agency level Some of the more pertinent direction follows

The Wilderness Act. The 1964 Wilderness Act provides general direction for managing wilderness values The Act states that wilderness areas

" shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character "

Department of Agriculture Regulations. The U S Department of Agriculture (USDA) regulations further specify that Forest Service wilderness areas will be managed to protect and where necessary restore the wilderness character of the land and its specific values of solitude, physical and mental challenge, scientific study, inspiration and primitive recreation To achieve that objective, the Department policy directs that natural ecological succession be allowed to operate freely, use levels in the wilderness be consistent with the maintenance of primitive conditions, and wilderness values will be dominant when resolving conflicts over resource use (39 CFR 293 2)

Forest Service Manual. Detailed direction for wilderness management is provided in the Forest Service Manual Wilderness is to be managed to ensure its character and values are dominant and enduring Wilderness is to be managed as one resource rather than a series of separate resources

The objectives for wilderness management (FSM 2320 2) include

- Maintain and perpetuate the enduring resource of wilderness as one of the multiple uses of National Forest System land

- Maintain wilderness in such a manner that ecosystems are unaffected by human manipulation and influences so that plants and animals develop and respond to natural forces

- Minimize the impact of those kinds of uses and activities generally prohibited by the Wilderness Act, but specifically excepted by the Act subsequent legislation

- Protect and perpetuate wilderness character and public values including, but not limited to, opportunities for specific study, education, solitude, physical and mental challenge and stimulation, inspiration and primitive recreation experiences

- Gather information and carry out research in a manner compatible with preserving the wilderness environment to increase understanding of wilderness ecology, wilderness uses, management opportunities, and visito, behavior

Wilderness management policy in the Forest Service Manual (FSM 2320 3 & 2320 06) includes

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- Where there are alternatives among management decision, wilderness values shall dominate over all other considerations except where limited by the Wilderness Act, subsequent legislation or regulations

- Manage the use of other resources in wilderness in a manner compatible with wilderness resource management objectives In wilderness, where the establishing legislation permits resource uses and activities that are non-conforming exceptions to the definition of wilderness as described in the Wilderness Act, manage these non-conforming uses and activities in such a manner as to minimize their effect on the wilderness resource

- Cease uses and activities and remove existing structures not essential to the administration, protection, or management of wilderness for wilderness purposes or not provided for in the establishing legislation

- Because wilderness does not exist in a vacuum, consider activities on both sides of the wilderness boundaries during planning and articulate management goals and the blending of diverse resources in forest plans Do not maintain buffer strips of undeveloped wildland to provide an informal extension of wilderness Do not maintain internal buffer zones that degrade wilderness values Use the Recreational Opportunity Spectrum (FSM 2310) as a tool in adjacent land management

- Manage each wilderness as a total unit and coordinate management direction when they cross other administrative boundaries Use interdisciplinary skills in planning for wilderness use and administration

- Gather necessary information to carry out research programs in a manner that is compatible with the preservation of the wilderness environment

- Whenever and wherever possible, acquire non-Federal lands located within wilderness Inform wilderness visitors that they face inherent risks of adverse weather conditions, isolation, physical hazards and lack of rapid communications, and that search and rescue may not be as rapid as expected in an urban setting in all publications and personal contacts

- Manage wilderness toward attaining the highest level of purity in wilderness within legal constraints

- Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value Economy, convenience, commercial value and comfort are not standards of management or use of wilderness

- Develop a monitoring plan to ensure standards are met

EARLIER PLANNING FOR THE HIGH UINTAS

Several use-monitoring and planning efforts have been conducted over the last 25 years for the High Uintas Many had to do with the suitability of the area for wilderness designation These earlier efforts provide some good historic background on the management perspective that has been in

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place for unroaded areas of the Uintas, and some baseline information that can be used for comparative purposes

It is interesting to note that there is a history of interaction between the Ashley and Wasatch-Cache National Forests on managing the Uintas throughout the period The first joint planning action was the 1981 High Uintas Interim Management Plan

By 1986, both the Ashley and the Wasatch-Cache National Forests had signed Forest Plans as required by the National Forest Management Act (1976) These documents took planning a step further in terms of integration with other resource concerns and added considerably more public involvement to make decisions establish acceptable standards for w. management The High Uintas is still managed under these mid-80s Forest Plans

PUBLIC INVOLVEMENT AND ISSUE IDENTIFICATION

Preliminary planning assessments (initiated in 1990) included public sensing, data collection, and analysis for development of desired conditions A scoping document was mailed to interested organizations and individuals in June of 1994 A Notice of Intent to prepare an Environmental Impact Statement (EIS) was published in the Federal Register May 16, 1995 describing the proposed action and inviting comments All comments received by mail, in person, FAX, on the phone and in public meetings are the basis for the issues

ISSUES CONSIDERED WITHIN THE SCOPE OF ANALYSIS AND SIGNIFICANT

The following issues were identified by an interdisciplinary team as within the scope of analysis and pertinent to the development of a reasonable range of alternatives to the proposed action The issues are based on content of public comment and on data collected after development of the proposed action

Issue 1. Human overuse threatens the integrity of ecosystem components such as riparian areas, wetlands, lakes, streams, topsoil, and wildlife and threatens potential for re-introduction of extirpated species (species that most likely inhabited this area at one time).

Some people are concerned that eroded, compacted, trampled and barren recreation areas and livestock pastures affect the ability of ecosystems to interact and function They also feel these uses may preclude opportunities for re-introduction of extirpated species Congressional designated wilderness areas were clearly intended to feature some level of human use To preserve the integrity of the wilderness ecosystem, these uses (i e camping, hiking, fishing, grazing, water storage, hunting, scientific studies, wildlife manipulations, etc) must be within the inherent biological and physical capabilities of the land

Vegetative Conditions. Vegetation in the wilderness is affected by humans in several ways For example, some recreationists compact soils around popular camping spots denuding the area of vegetation, tie their

stock to trees damaging root systems, strip live trees of branches for firewood, and sterilize soils by building large campfires Some livestock grazing practices retard natural vegetative diversity, denude soil and erode stream banks in riparian areas

When vegetative cover and natural composition of plant species have been adversely affected, wilderness values are compromised In order to meet direction outline in the Wilderness Act (natural ecological processes operate freely), native plant species should dominate plant communities Introduced (non-native) species are indicators of disturbance These include plants listed by the State of Utah as noxious weeds and other plants such as common dandelion

Measurement indicator(s) used to compare alternatives will be

1a) A qualitative description of habitat available to re-introduce extirpated species and the barriers presented by human uses

1b) A qualitative description of the extent to which soil productivity, as measured by topsoil conservation, is affected by all human uses in high elevation alpine areas

Issue 2. Extent visitor solitude and primitive recreation experience are affected by other recreationists, resource damage and rules and regulations.

Section 2 (c) of the Wilderness Act (1964) states that a wilderness "has outstanding opportunities for solitude or a primitive and unconfined type of recreation " Managers of any Wilderness of the National Wilderness Preservation System must concern themselves with whether they are meeting the intent of the law and visitor expectations for these qualities

Solitude or remoteness is a perceived condition of being in an untrammeled, secluded, inaccessible, and out of the way area Many people are concerned that the signs, sounds and evidence of humans within wilderness impact solitude, particularly in more heavily used areas

An important component of primitive recreation is getting away from the limited flexibility of daily schedules, the rigid structure created by laws and regulations, and the authorities who enforce them Posted wilderness regulations and special orders and even Wilderness Rangers may affect one's perception of being in a remote, secluded area and being on your own It can feel as if the "do's and do not's" have essentially followed them into the wilderness

It is difficult to define what is enough solitude or appropriate primitive recreation within the Wilderness context Wilderness visitors have different backcountry capabilities, skill levels, values and expectations for what experience is appropriate and desirable in the High Uintas User groups, skills, expectations and values are identified in Chapter III in the sections on Social Setting and Recreation

Measurement indicators used to compare alternatives will be

2a) A quantitative comparison of the acreage available by Class (I, II, and III) for each alternative, and how three types of users may be affected

2b) A qualitative discussion of the effects of other users on the solitude and primitive recreation experience of three types of users, for each alternative

2c) Effects of management actions directly in the High Uintas Wilderness, including signing, trail work, wilderness ranger camps, ranger presence on the three types of users

2d) Effects of management actions outside the High Uintas Wilderness, including education programs, trailhead information, specials orders for camping, fires, group size

<u>Issue 3</u>. Extent outfitting and guiding (O/G) operations are affected by use limits and desired conditions (Class) designations.

The Wilderness Act of 1964 states, "except as provided for by this Act, (no exceptions to this rule are provided for in the HUW) and subject to existing private rights, there shall be no commercial enterprise and no road within any wilderness area designated by this Act ... except as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act." Section 4(d)6 continues, "Commercial Services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper to realizing the recreational or other wilderness purposes of the areas."

Outfitters and Guides in the High Uintas Wilderness provide wilderness visitors land use ethics education, wilderness and cultural interpretation, opportunities to assist in wilderness management projects, and appropriate recreation opportunities not provided by other entities.

Even so, outfitting in wilderness is authorized only if there is a documented need for the services. A "Needs Analysis" for outfitting and guiding in the High Uintas Wilderness is included in Appendix A of this document.

Measurement indicators used to compare alternatives will be:

3a) Acres available with the highest opportunity for outfitted use

3b) Relative level of use authorized for outfitters and guides per drainage

3c) Economic effects on outfitter operations

<u>Issue 4</u>. The extent system trails (including signs and bridges) meet wilderness objectives including soil and water quality, and other indicators of pristine character. In some areas trails are inappropriate, they duplicate destinations, are poorly placed and/or are insufficiently maintained.

Trails can impact wilderness experience for some visitors. Trails are permanent improvements and can be perceived as instruments to control one's movements. Some people are also concerned that hiker, recreational and domestic livestock movement along poorly located trails is

affecting wildlife security and behavior, and soils and water quality. Too many trails to a single destination (more than one trail into a basin) can encourage recreation overuse of the destination.

Measurement indicators used to compare alternatives will be:

4a) Acres available with no system trails

4b) A qualitative description of how surface and subsurface water flow regimes are affected by all human uses in riparian areas

<u>Issue 5</u>. Human and animal waste threaten water quality.

Water quality and quantity originating in the wilderness is important to downstream users. The State of Utah depends on water originating in the High Uintas Wilderness for both culinary and agricultural use. Wilderness visitors expect clean, clear water and resident wildlife depend on it.

Some recognized sources of pollution are livestock and wilderness visitors. The significance of pollution created by these sources has not been quantitatively evaluated, however water quality monitoring of streams outside the wilderness reveal that State water quality standards are not being violated by water generated from wilderness watersheds.

<u>Issue 6</u>. Exotic (non-native) plant species threaten natural functions of the ecosystem.

Aggressive exotic species (including those designated as noxious weeds) have the capacity to replace native species and alter composition of native plant communities. In extreme cases, including cheatgrass on the Snake River Plains of Idaho and leafy spurge and spotted knapweed in Montana, these plants alter natural functions of native ecosystems. Most of the High Uintas Wilderness is not threatened by aggressive exotic plants. However, a few species listed as noxious weeds in Utah are capable of persisting at lower elevations of this wilderness. They were present in some canyon bottoms of the south slope prior to wilderness designation in 1984.

<u>Issue 7</u>. The extent to which habitat and populations of native, endangered, threatened, proposed and Forest Service sensitive species of fish and wildlife are protected by wilderness management measures.

One of the specific purposes for which the High Uintas Wilderness was established was preservation of fish and wildlife habitat. Habitat for a variety of species can be found within the High Uintas. The following species groups will be used in comparing the alternatives.

Federally listed endangered, threatened and proposed species identified by the U.S. Fish and Wildlife Service:

Peregrine falcon
Whooping crane
Bald eagle

U.S. Fish and Wildlife candidate species and/or Forest Service sensitive species which inhabit or have habitat near or within the High Uintas Wilderness

Spotted bat
Boreal owl
Townsends big-eared bat
North American lynx
Flammulated owl
Colorado cutthroat trout
Wolverine
Great gray owl
Northern three-toed woodpecker
Northern goshawk
Spotted frog
Bonneville cutthroat trout
Alpine poppy
Clustered Lady's Slipper

Species of concern These species are not candidates for official listing, however we list them here because the entire range and distribution of these species are within the High Uintas Wilderness (*) or, it has been listed for similar habitat in Colorado (#)

Uintah pika*
Uintah Parrya*
Uinta Beardtongue*
Boreal toad#

Issue 8. The extent to which air quality is affected by pollution and management ignited prescribed fire smoke.

Currently, the HUW is designated as a Class II airshed As such, the Forest Service does not review Prevention of Significant Deterioration applications and therefore has no regulatory control over new sources of air pollution exterior to the wilderness that can contribute to changes in air quality related values such as water chemistry, soil ph, and visibility (like coal burning power plants) Sometimes visibility quality is impaired by smoke from management ignited prescribed fire outside the wilderness

Issue 9. Extent fire is allowed to play its natural role in the ecosystem.

Since the 1920s Forest Service policy has been to suppress all fires across the National Forest system Ecologists have recognized fire suppression activities as an interruption to natural fire cycles, especially in fire dependent vegetation types like lodgepole pine stands Much of the High Uintas Wilderness is located in large stands of lodgepole pine, where fire suppression policies have the potential to interrupt fire's natural role in the ecosystem

Issue 10. Archeological and Historic Sites.

Several analyses by experts in both historic preservation and wilderness management (Knudsen, Attenbury) have determined solutions amenable to proponents of the resource values are not difficult to accommodate Historic and prehistoric sites are evidence that humans have used and inhabited wilderness settings at earlier times and with different technological capabilities, social and ethnic traditions and economic focuses Self-discovery of these few relic sites can be a valuable part of the overall wilderness experience

Treatment of significant historic sites will not be different from one opportunity class to another Decisions regarding maintenance, preservation, scientific investigation or removal of historic properties from the HUW (such sites are relatively rare, especially

structural historic sites) will be made on a case by case basis

Issue 11. Research Natural Areas (RNA).

An RNA is an area set aside by a public or private agency specifically to preserve a representative sample of an ecological community, primarily for scientific and educational purposes Several RNAs (2-3) have been proposed for the HUW One is very close to being formally established The mandates applicable to RNAs will be met in both Class I and II RNAs will be best served by drawing as little attention to them as possible

Issue 12. Extent stocking of previously fishless waters with fish effects historic aquatic natural processes.

Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12 It is recognized that fish stocking invites excessive human use in some areas and that stocking can interfere with natural lake ecology (Holden, et al, 1996) However, in lakes that are currently being stocked, impacts to the historic aquatic natural systems have already occurred (Cowley, 1997, personal communication)

The Forest Service adheres to the 1964 and 1984 Wilderness Acts which state that "nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to fish and wildlife management in the National Forests." As a result of this direction, any decisions about stocking lakes and streams with fish must be made in coordination with the Utah Division of Wildlife Resources Comments regarding fish stocking in the HUW will be shared with UDWR as negotiations proceed on an Memorandum of Understanding for management of aquatic habitats

ISSUES CONSIDERED OUTSIDE THE SCOPE OR, OR NOT SIGNIFICANT TO THE ANALYSIS

The following issues were identified by an interdisciplinary team as not within the scope of analysis, pertinent to the developments of a reasonable range of alternatives to the proposed action, or necessary for the evaluation of effects

Livestock grazing within designated wilderness. Some responding to the scoping document commented that grazing should not be allowed within the wilderness Specific language was included in the 1964 Wilderness Act to provide for the continuation of livestock grazing where established prior to the date of the enactment of the Act The language in Section 301 of the 1984 Utah Wilderness Act reaffirms that intent (See Questions Related to the Decisions in this chapter)

Predator control. Predator control within the wilderness is outside the scope of this document As of May 1995, the Forest Service recognizes the Animal and Plant Health Inspection Service (APHIS) - Animal Damage Control program and State agencies as having the authority and expertise to conduct predator control on National Forest System lands, to determine livestock losses,

and to determine methodology for animal damage management (See Forest Service Manual, Chapter 2650). APHIS prepared an environmental analysis document (1996) for predator control and other animal damage management activities initiated by APHIS on National Forest System lands.

Fish stocking in wilderness. Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter IV.

Recreational hunting, wildlife and Colorado cutthroat trout preserves. The State is responsible for establishing and administering regulations for hunting and fishing. The Forest Service is responsible for managing healthy habitats. Hunting will continue in the High Uintas Wilderness when and where deemed appropriate by Utah Division of Wildlife Resources. The Utah Wildlife Board is the body who accepts proposals on special fish and wildlife protection regulations.

Enforcement of laws and regulations. Respondents to the scoping phase of this analysis identified the following as potential issues. Other rules and regulations also apply to this area; they are discussed in Chapters II-IV.

Snowmobiles within the wilderness. The 1964 Wilderness Act prohibits commercial enterprise (except for activities appropriate for recreation or other wilderness purposes), permanent or temporary roads, use of motor vehicles, motorized equipment or motorboats, landing of aircraft, other forms of mechanical transport, and structures or installation. Exceptions can be made for administration of the area when it meets minimum requirements and in emergencies involving the health and safety of persons within the area.

People using snowmobiles within the wilderness are doing so unlawfully and will be prosecuted when discovered.

Illegal outfitting and guiding. Occupancy and use of National Forest lands for commercial gain without special use authorization from the district ranger is prohibited by CFR 261.10. Illegal outfitters and guides will be prosecuted when discovered.

The ability of Forest officers to enforce the above laws reflects budget levels. Illegal outfitting and guiding activities are a top priority for investigation on the South slope. Some illegal entry of snowmobiles into the wilderness has been reported primarily on the North slope.

As with most enforcement situations, these problems may never be completely solved. However, with a combination of education, cooperation from public users, authorized outfitter/guides and enforcement, the problem can be minimized.

Water rights, stabilization of dams and hydrometeorological data collection sites. Water rights will not be affected by this wilderness management plan. They will continue to be administered under existing laws and regulations. The issue of reservoir maintenance and water storage will not be affected by this wilderness management plan. This issue is being addressed through the

Central Utah Project. There are presently three hydrometeorological data collection sites in the High Uintas Wilderness. These sites will not be affected by this wilderness management plan. The management of existing sites will be managed according to the Wilderness Act, HUW Designating Legislation and Forest Service regulation and policy.

Reserved mineral estate. According to Forest Service status records, the State of Utah retains a reserved mineral estate of approximately 500 acres within the High Uintas Wilderness near the headwaters of Smiths Fork and East Smiths Fork. The state retains the right to mine or lease these acres. Any proposal for entry to mine would be considered and evaluated with further NEPA analysis.

This plan does not address and will not affect any other mineral rights. Mineral rights/activities are addressed through existing mining laws and wilderness legislation, and other Forest Service regulation and policy.

Overflights. Overflights can detract from the wilderness experience in terms of visuals and noise. At present all flights over Wilderness are regulated by the FAA. Landings in the wilderness are prohibited except with approval of the Regional Forester or the Forest Supervisor in the case of emergencies. Approved search and rescue plans outline appropriate approvals for landings and overflights in the wilderness. Any future requests for sightseeing type flights will be analyzed in light of present restrictions and NEPA requirements.

QUESTIONS RELATED TO THE DECISIONS MADE IN THIS ANALYSIS

How will grazing decisions on allotments within the wilderness be made?

Congress provided for continued grazing as articulated in the Congressional Grazing Guidelines, sometimes called the Colorado Grazing Guidelines. The guidelines have been adopted by the Forest Service as agency policy. They consist of five sets of statements. Three pertain to range improvements, one to motorized use, and one to grazing in general. The guideline states, "there shall be no curtailment of grazing in wilderness areas simply because an area is, or has been designated wilderness, nor should wilderness designation be used as an excuse by administrators to slowly 'phase out' grazing. Any adjustments in the numbers of livestock permitted to graze in wilderness areas should be made as a result of revisions in the normal grazing and land management planning and policy setting process, giving consideration to legal mandates, range condition, and the protection of the range resource from deterioration." Because of this guidance, any grazing decisions will continue to be made in Allotment Management Plans or the equivalent.

How will this document be implemented and does it relate to on-the-ground site-specific actions?

Forest planning is a two-step process. The National Forest Management Act (NFMA) of 1976 directs that Land and Resource Management Plans (Forest Plans) be developed for each national forest. They

focus on relatively large scale units of land and define goals, objectives, and management guidelines for those units The decisions reflected in forest plans (such as this document) are more general or programmatic in nature

At the second step, when projects or activities are proposed to implement a forest plan, another, more site-specific level of environmental analysis and documentation must occur Site-specific decisions must be consistent with the direction contained in the LMP

For the wilderness planning effort, site-specific (or project level) environmental analysis will address if and how recreation use (including commercial recreation) should be restricted when standards for social, physical and/or biological resources are exceeded It will determine the appropriate tools to use if standards are exceeded (for example, environmental and wilderness ethics education, overnight use restrictions, designated campsites, campfire restrictions, large group permits, trailhead quotas, trailhead quotas on total number of visitors, group size limits, etc) Wilderness education is an especially important tool, it will be used extensively to offset the need for regulations

The wilderness planning effort will also help identify critically needed baseline data These inventories will be included in Wilderness Implementation Schedules with other future actions

What is the relationship between fish stocking and wilderness planning?

Perhaps the most popular recreational activity in the High Uintas Wilderness is fishing, usually in high elevation lakes Wilderness rangers are asked more frequently where fish are biting than any other single question

Stocking trout and grayling in the High Uintas (and throughout Utah) is done by the Utah Division of Wildlife Resources To meet the fishing demand, the State of Utah has been stocking many High Uintas lakes since the agency was created (some lakes are unstocked) Both native (Colorado and Bonneville Cutthroat) and non-native (Rainbow, Brook, Grayling) species have been stocked The Wilderness Act (1964) provides that "nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests" (16 U S C 1133)

Providing and maintaining habitat for fish and wildlife is the responsibility of the Forest Service Federal law also provides protection for species which are threatened or endangered by potential extinction under the Endangered Species Act Concern for Colorado and Bonneville Cutthroat populations have made them "sensitive" species for Forest Service management, and reviews of both species for listing under the Threatened and Endangered Species Act have been conducted by the U S Fish and Wildlife Service

Over the past few years, proponents of sustaining and/or reintroducing native fish and other non-fish aquatic species and allowing ecological processes freedom to operate without any human influence have

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come into conflict with others who support traditional recreational fishing and fish stocking Both groups cite legal and ethical mandates for their causes (see above) Consequently, federal and state agencies have sometimes been forced to opposite sides of the issue and placed in seemingly confrontational positions without any real will to be adversaries

Rather, the Forest Service, Bureau of Land Management and the International Association of Fish and Wildlife Agencies (an association of state fish and game departments) are committed to interagency cooperation and consultation regarding the management of habitats and populations This agreement is outlined in "Policies and Guidelines for Fish and Wildlife Management in National Forest and Bureau of Land Management Wilderness" (the IAFWA agreement)

Responding to this need for consultation, the Utah Division of Wildlife Resources (UDWR) has developed a fish stocking inventory and history for the High Uintas Lakes Both agencies will be using the best information available on current populations, wilderness values, and desirable and appropriate recreation for the area as the policy is developed

Managers and specialists at UDWR and the Forest Service are committed to working through concerns about how fisheries and aquatic habitats will be managed in the High Uintas Wilderness The result will be an agreement between the agencies (MOU) describing standards for high lakes fisheries and habitat management for the High Uintas Wilderness

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chapter two

ALTERNATIVES

Chapter II

INTRODUCTION

This chapter describes the Limits of Acceptable Change planning process, current forest plan direction for the High Uintas Wilderness, alternatives eliminated from further consideration, and the five alternatives considered in detail including the No Action

The Limits of Acceptable Change Planning Process. The Interdisciplinary Team used a nationally recognized planning process called the Limits of Acceptable Change (LAC) for establishing acceptable resource and social conditions. This process is a deviation from recreational carrying capacity concept, with the primary emphasis on the conditions desired in an area rather than on how much use an area can tolerate. LAC should not be confused with a management objective that one is attempting to achieve, but rather a maximum limit of negative change allowed. A detailed description of the nine steps involved can be found in the project record

FOREST PLAN DIRECTION

The two Land and Resource Management Plans (Forest Plans) provide direction for High Uintas Wilderness through goals, management prescriptions, direction, and standards and guidelines. The following is the portion of Forest Plan direction from the Ashley and Wasatch-Cache Forest Plans that will not be changed as a result of this environmental analysis. Other management direction that is not within the scope of this analysis (such as managing for the visual quality objective of preservation) but still relevant to management of the HUW, will be re-issued in the Forest Plan amendment in a manner as to provide identical management direction for both Forests

Wasatch-Cache National Forest

Goal - 14. Preserve and protect wildernesses as examples of natural ecosystems for future generations. Promote "leave no trace" camping practices (WCLRMP IV-7)

Ashley National Forest

Goal. Administer the High Uintas Wilderness in accordance with the Utah Wilderness Act of 1984 (ALRMP IV-21)

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER CONSIDERATION

As mentioned earlier in the document, during the wilderness planning effort a group of interested citizens (Wilderness Task Force) worked in developing a desired condition for

the HUW As part of the planning effort, different group members suggested various ways for mapping Classes across the High Uintas Wilderness landscape

One map of Classes developed in this early planning effort represents a group of Task Force members working together in Evanston, WY A similar array of Classes was submitted by the Utah Wilderness Association and Wilderness Watch organizations during scoping These three maps were used in the development of Alternative 3

Two other maps were developed in the above planning effort by a group of Task Force members working together in Roosevelt, UT and another group of Task Force members in Heber City, UT This information was used in the development of Alternative 4

ALTERNATIVES CONSIDERED IN DETAIL

Direction Common to All Action Alternatives (Alternatives 1-4). Direction common to all action alternatives is the proposed management direction that does not vary by any of the action alternatives This includes criteria to be used in issuing outfitter and guide permits, wilderness-wide and Class-specific desired future conditions, and standards and indicators for each Class

An important step in wilderness planning is defining the desired condition of the wilderness resource and of each Class within the wilderness The desired condition is interpreted from the 1964 and 1984 Wilderness Acts and regulations Indicators and standards established for these desired conditions are management tools They are used to indicate when an area is achieving desired conditions, or whether management actions need to be implemented to mitigate or negate actions that degrade wilderness character

Desired Conditions Wilderness-wide. An important step in wilderness planning is defining the desired condition of the wilderness resource and of each Class within the wilderness The desired condition is interpreted from the 1964 and 1984 Wilderness Acts and regulations

The High Uintas Wilderness is recognized as an important component of the National Wilderness Preservation System

Bio physical. Air quality meets Federal and State standards There is no measurable disturbance to water chemistry or biotic components due to acid deposition There is no measurable degradation to water quality Stream and river channels are naturally appearing and are maintained by natural flow conditions The ability of soils to support naturally occurring vegetation communities is not significantly impaired by human activities

Plant communities, including riparian communities, are affected by natural processes, and maintain their natural appearance Bare soil conditions may occur due to natural processes Viable populations of indigenous High Uinta plants are sustained, with emphasis given to threatened, endangered and sensitive (TES) species The

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mosaic of plant communities contributes to overall biodiversity

Fire is one of the primary natural ecological processes serving an integral role in the maintenance of the wilderness ecosystem The wilderness ecosystem is allowed to be highly dynamic, evolving over time Smoke is part of the natural fire process and is seen in the wilderness and in adjacent areas

Wildlife and fish are recognized as an integral part of the wilderness and contribute significantly to overall biodiversity Natural processes and the forces of natural selection determine the diversity of wildlife and fish habitat and species Wildlife transplants are limited to indigenous species and considered only when a vacant niche has been identified Where potential exists for a transplant species to migrate into adjacent management areas, the impacts are included in the environmental analysis Reestablish indigenous species classified as sensitive The High Uintas Wilderness acts as a component to maintain indigenous species presently existing in the area

Social. Cultural and historic sites are recognized as an integral component of the wilderness resource Past human uses of the landscape are understood Values of cultural resources sites are preserved

Livestock grazing is recognized as an appropriate use of Wilderness Results of livestock grazing are consistent with desired condition of water, soils, wildlife and vegetation

There are opportunities for public use, enjoyment and understanding of the wilderness, through experiences that depend upon a wilderness setting Outstanding opportunities for solitude or a primitive and unconfined type of recreation exist An appropriate mix of outfitters and guides are needed to assist in managing and protecting the wilderness resource and provide for the well-being of visitors to the wilderness

Visitors find clean water and air, and indigenous fish, wildlife and plant species Visitors may encounter signs of fire, including smoke, and they are aware of the natural role of fire in wilderness Smoke from fire may impair visibility Historic and pre-historic cultural resources may be discovered Visitors may encounter administrative personnel Trails provide recreation access while protecting wilderness values Results of recreation, including hunting, fishing and commercial recreation*, are consistent with the desired conditions for soils, water, vegetation, wildlife and fish habitat and social conditions

Established permitted irrigation impoundments and hydrometeriological measuring devices are authorized and appropriate uses in this wilderness They are maintained and monitored using minimum tool concepts As opportunities arise, relocate water use and prediction functions outside the wilderness Stabilize and rehabilitate decommissioned reservoirs at a level that more naturally reflects the preconstruction conditions, allows natural streamflow processes to re-occur and at a level that poses no hazard, requires no maintenance or inspection, and requires no permit

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Wilderness dependent research, including Research Natural Areas (RNAs) is appropriate and encouraged. Scientific values of the HUW are recognized.

Outfitting and Guiding Criteria. The following criteria will be used in issuing and evaluating outfitter and guide permits and service day allocations.

Criteria A. Ability to accomplish environmental and land stewardship education and interpretation goals.

Criteria B. Ability to accomplish resource protection and other National Forest goals (i.e. trail maintenance/construction and rehabilitation, and campsite rehabilitation and re-location).

Criteria C. Service Days actually used as compared to service days authorized. This may reflect either an increase or decrease in authorized service days. For example, an outfitter may be authorized 200 service days per season, and for 3 years running, use only 100 service days. Unless there are extenuating circumstances (weather, fire closure, business changes hands in middle of season, etc.), this indicates less citizen need for commercial outfitting services and would result in a decrease in authorized service days. Or, an outfitter may be authorized 200 service days and for three years running their actual use bumps this limit. At this point the outfitter can request more authorized service days if there are service days available in that drainage (refer to service day ceiling), and documentation is presented on how they meet these criteria.

Criteria D. Documented citizen requests over time for particular commercial services.

Criteria E. Ability of the agency to monitor existing permits for compliance with the forest plan and special use permit requirements. This may include:

- Self-monitoring of operating plan requirements (i.e. permittee evaluation of higher use areas using photographs, campsite monitoring, etc.)
- Agency budget allowance for proper and effective administration and monitoring of outfitter permits.

Criteria F. Lakes and trail corridors in Duchesne River, Henrys Fork, Smiths Fork and East/Stillwater Forks of the Bear River drainages are the least appropriate for outfitting operations because the current public use meets or exceeds the desired conditions for that area.

Criteria G. Outfitter knowledge of area, safety, equipment and quality of business and customer service.

- Guides' knowledge of the High Uintas, including years and type experience in the business.
- Safety practices and training.
- Condition of stock, tack and camping equipment.
- Client evaluations of service and use of generally accepted accounting and business practices.

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Desired Condition Classes. Desired Condition Classes are applied as a means of acknowledging diversity in use patterns and user behavior. Establishing varying classes in the wilderness, allows management to use specific strategies for specific sections of the wilderness. Defining these classes provides managers with a tool to enhance the protection of wilderness. The kind and intensity of management varies based on the desired condition.

DESIRED CONDITION CLASS I

The area is characterized by an unmodified natural environment. Human induced change is temporary, minor and less than in Class II and III. Soil compaction and minor vegetation loss associated with human related activities are temporary, discontinuous and limited in extent to the area of activity. Human induced changes to soils, water and air quality, wildlife habitats, natural fire regimes, and vegetation do not disrupt the continuity of natural processes within the watershed.

By managing the area to maintain very low use levels, outstanding opportunities for solitude or a primitive and unconfined type of recreation are available for the visitor who accepts the responsibility to travel in small groups, practice excellent wilderness ethics, use orienteering skills and spend extra effort to leave no trace. There are few if any system trails. Appropriate and properly designed system trails that pass through Class I are considered corridors and are maintained. Encounters with other groups and rangers are rare. Both the outfitted and general public disperse use, and practice and provide others with examples of leave no trace camping techniques. Regulations are communicated to visitors primarily outside the wilderness. Few direct contacts by wilderness rangers are made, unless needed to monitor conditions or address problems.

Generally, Class I is defined outside permitted livestock allotments, except areas within allotment boundaries that are unsuitable, vacant or unused (due to physical barriers or quality of forage). Lakes are generally not stocked with fish.

DESIRED CONDITION CLASS II

The area is characterized by predominately unmodified natural environment. Some human induced change is evident but will recover. Soil loss, compaction and minor vegetation loss associated with human related activities are discontinuous and limited in extent to the area of activity. Human induced changes to soils, water and air quality, wildlife habitats, natural fire regimes, and vegetation do not disrupt natural processes within the watershed.

Outstanding opportunities for solitude or a primitive and unconfined type of recreation exist. Compared to Class III, fewer areas of concentrated visitor use occur. In areas of concentrated human use, dead and down firewood is available but may be scarce. Developed, maintained and signed trails exist. Encounters with other groups, rangers and wilderness ranger camps are less than Class III but more than Class I. Both the outfitted and general public practice leave no trace camping techniques. Where regulation is needed to prevent deterioration of the

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wilderness resource and visitor experience, it is communicated to visitors primarily outside the wilderness and on-site Permitted livestock grazing and fish stocking may occur

DESIRED CONDITION CLASS III

The area is characterized by a predominantly unmodified natural environment Impacts could persist from year to year Soil loss, compaction and minor vegetation loss associated with human related activities are discontinuous and limited in extent to the area of activity Human induced changes to soils, water and air quality, wildlife habitats, natural fire regimes and vegetation do not disrupt natural processes and are not significant within the watershed

Concentrated use is more common than in Class II, but is managed to augment opportunities for solitude or a primitive and unconfined type of recreation During peak season and at popular sites, outstanding opportunities for solitude are more limited than in Class I and II In more popular campsites, dead and down firewood may be unavailable Well maintained and signed trails aid visitors Encounters with other groups, rangers and wilderness ranger camps are more common than in Classes I and II Both the outfitted and general public practice leave no trace camping techniques Where regulation and management actions are needed to prevent deterioration of wilderness resources and visitor experience, it is communicated to visitors both outside the wilderness and on-site Permitted livestock grazing and fish stocking may occur

Visitors may come in contact with water impoundments or hydrometerological measurement devices Repair, reconstruction or stabilization of water impoundments and associated activities (borrow sources, access roads) is performed so the ability of soils to support naturally occurring vegetation communities is not diminished

STANDARDS AND MONITORING REQUIREMENTS

Table S-1. Measurable limits of acceptable change in order to maintain or move toward the desired conditions

Resource	Indicator	Standard	Monitoring Plan	Rationale
Air Quality	Deposition	*All Classes*: Nitrate and Sulphate loading will not exceed 3-5 kg/hectare/yr and five kg/hectare/yr, respectively	One to three deposition sites near lake sites (see monitoring sites for surface water chemistry)	Nitrates and sulphates can contribute to acidification and promote submerged vegetation growth, high oxygen demands and high potential for winter fish kills in high mountain lakes.
	Standard Visual Range	*All Classes*: Long-term visibility impairment from human activities will not impair long term baseline visual range more than 10% of the 90th%ile (clean days) in Class II wilderness airsheds. Short-term (14 day) visual range impairment from human activities outside the wilderness such as Rx fir smoke will not reduce pre-activity visual range more than 20% in Class II wilderness airsheds.	Visual monitoring near Mill Park. Smoke emissions modeling.	Monitoring of Standard Visual Range will allow detection of air quality impacts that threaten to be long term or permanent. In the Clean Air Act (CAA), Congress established visibility as an Air Quality Related Value (AQRV) and set policy. USFS, NPS, and EPA surveys indicate that visibility (clean air distant views) is a national treasure on public lands in which citizens expect to be protected, maintained, or improved. The CAA and Wilderness Act hearings further demonstrate that visibility is a national concern, goal, and priority.
	Surface Water Chemistry (pH, alkalinity, cations, anions)	*All Classes*: Alkalinity will not be reduced more than 10% of the baseline in all surface waters. State of Utah water quality standards for pH, nitrates and sulfates, as defined in State of Utah Standards of quality of the Waters of the State (Amended 1-91) Section R448.2-14.2, Numeric Criteria for Wildlife.	Monitor appropriate number of sites (presently monitoring Dean, Bluebell*, and Walk-up Lakes).	Surface waters in higher elevation watersheds have been found to be highly sensitive to acidification. Surface water pH is a direct indication of the ability of a watershed to buffer, or neutralize, acids deposited by precipitation or dust. At lower pH values, acidification becomes toxic to fish and aquatic invertebrates. Under certain conditions, nitrates can act as a fertilizer promoting excessive submerged vegetation growth, high oxygen demands and high potential for winter fish kills. * In 1996, the Bluebell site will be replaced with a lake in the Henry's Fork drainage on the North Slope.

Resource	Indicator	Standard	Monitoring Plan	Rationale
Water Quality	coliform bacteria	All Classes: State of Utah water quality standard will be met for acceptable amounts of coliform bacteria in waters for their specific beneficial uses as defined in State of Utah Standards of Quality of the Waters of the State (effective 2/94), Section R448-2-14.1, Numeric Criteria for domestic, recreation and agricultural uses	Periodic monitoring of some lakes basins to ensure implementation of and compliance with campsite setback standards (campsites at least 200 feet from water sources). Sample existing site near Henry's Fork trailhead as needed	Certain lake basins experience high amounts of human uses. This creates the potential for introduction of human or livestock waste into surface waters. Campsite setback standards, where enforced, have proven effective in reducing this potential The State of Utah assigns "beneficial uses" categories to different streams. Appropriate standards for fecal coliform counts accompany each "beneficial use" category
	trail placement design	*Class I*: trailless* *Class II & III*: Trails avoid wetlands	Standards adhered to during trail construction and reconstruction	Trails can be a non-point source of sediment pollution to streams and other surface waters. Trails located in these areas will inevitably effect surface water quality, subsurface water flow patterns and wetlands and riparian area function * Where a system trail (one identified on the HLW map) passes through Class I, the trail (1.4 mile corridor) is zoned as Class II
		Class II & III: Trails avoid stream crossings where bank gradients are greater than 30%.		
		Class II & III: Trails are designed and maintained so water does not run down the trail.		
	trail switchbacks	*Class I*: trailless* *Classes II & III*: Trail switchbacks do not show signs of shortcutting. [Special Order 36 DFR 261.55(e)]	Field observation and incident report analysis	Short cutting trail switchbacks leads to deterioration of constructed trails. Shortcuts between switchbacks can severely erode causing sedimentation to streams and irreparable damage to trails
	camping distance from water sources	*All Classes*: Terrain permitting, campsites must be at least 200 feet from water [Special Order 36 CFR 261.58(e)]	Field observation and incident report analysis	The purpose of this order is to protect natural resources and enhance the visitor's wilderness experience. Social impacts occur when multiple groups of campers concentrate activity near "beauty spots." Camping away from lake shores will tend to reduce encounters and preserve the aesthetic quality of lake shores--a limited and highly valued resource (Cole, 1989). In the same reference, Cole goes on to suggest there is little evidence that pollution from lake shore camping is a serious problem. However, there may be some place where camping close to water causes pronounced pollution. Other researchers (Taylor and Erman, 1978) speculate that some subtle changes in aquatic ecosystems may be the result of recreation activities close to the lake shore
	bedding or tethering any recreation stock	*All Classes*: Stock cannot be tethered within 200 feet of water sources for more than two hours. [Special Order 36 CFR 261.58 (aa)]	Field observation and incident report analysis	

Resource	Indicator	Standard	Monitoring Plan	Rationale
Soil Quality	A visual determination of erosion class will indicate where soil erosion, compaction, displacement have caused significant degradation to site productivity or water quality. These standards are best applied to evaluate soils resource conditions at areas where human recreation use is concentrated campsites, overlooks, fishing spots and trails.	*Class I* No more than 15% of all use areas have erosion Class I characteristics. 0% erosion Classes II or III	*Classes I-III* Periodically monitor erosion control practices on sites that exceed erosion Class I or II standards. *Class I* Monitor trend in campsite condition on one drainage (or portion of) that exceeds erosion Class I or II standards, at least once every 10 years.	Erosion Class I represents resource conditions (bare soil, exposed rock) that could occur under natural variations of climate. The scientifically recognized limit for measurement variations in site condition due to natural processes is 15%. Anything more than this is consistently noticeable and measurable result of human activities and therefore unacceptable in Class I areas. Since erosion Class I conditions are a precursor to erosion Class II and III conditions, it follows that occurrence of these conditions in Class I areas is also unacceptable.
		Class II No more than 25% of all use areas have erosion Class I characteristics, no more than 15% with erosion Class II characteristics, 0% with erosion Class III characteristics.	*Classes I-III* Periodically monitor erosion control practices on sites that exceed erosion Class III standards. *Class II* Monitor trend in campsite condition on one drainage (or portion of) that exceeds erosion Class II standards, at least once every 10 years.	Because erosion Class I characteristics are a precursor to acceptable resource conditions associated with erosion Class II characteristics, considerable amounts will be allowed to occur in Class II and III areas. Erosion Class II represents resource conditions that are early warnings of resource degradation. Because they are not yet an indicator of permanent resource damage, certain amounts will be tolerated. The standards represent a threshold at which periodic and more frequent monitoring will occur to ascertain whether resource damages are becoming permanent. Erosion Class III represents resource conditions that are indicative of permanent resource damage and violations of State and Federal water quality standards. As such, they are an unacceptable change within the wilderness.
		Class III No more than 50% of all use areas have erosion Class I characteristics, no more than 25% with erosion Class II characteristics, 0% erosion Class III	*Class III* Monitor trend in campsite condition on one drainage (or portion of) that exceeds erosion Class I standards, at least once every 10 years.	

Resource	Indicator	Standard	Monitoring Plan	Rationale
Wildlife and Fisheries	Bank erosion (for aquatic habitat)	No standard (baseline inventory has not been completed) *All Classes*: Once inventories are complete a rate of bank erosion will be established within the range recorded for stable reaches within similar stream types and landforms	Monitoring plan	High mountain lake stabilization is identified as mitigation for Uinta Basin Replacement proposal under the Central Utah Project (CUP) Completion Act Authority. Loss of storage, particularly where high mountain reservoired lakes are clustered, can result in channel adjustments and loss of aquatic habitat downstream
	Neotropical birds	No standard (baseline inventory has not been completed) *All Classes*: Once inventories are complete, a specific population number and species diversity will be the standard	No monitoring plan	There is a national standardized protocol for surveying neotropical migrant birds. By monitoring neotropical bird species, results can be compared to state, regional and or national data to see if changes are local or on a larger scale. At the local level results can be analyzed to determine and compare effects of management inside and outside the wilderness
	Habitat available for U.S. Fish and Wildlife Service listed threatened or endangered (TE) species (none as of 1996) and Forest Service sensitive (S) species	No standard (baseline inventory has not been completed) *All Classes*: Once inventories are complete, a specific acreage of habitat available will be the standard	No monitoring plan	Management of wildlife on National Forest System lands is a joint responsibility. The Forest Service is responsible for managing wildlife habitat and the State of Utah is responsible for managing species populations. In order to identify suitable habitat for potential and resident wildlife species within the wilderness, we will use GIS (Geographic Information System) to analyze vegetative cover and structure. This will make it possible to design the most cost effective survey areas (in partnership with the State of Utah) to verify presence or absence of TES species (i.e. lynx, etc.) and coordinate plans for possible reintroduction of extirpated species

Resource	Indicator	Standard	Monitoring Plan	Rationale
Vegetation	Habitat available for US Fish and Wildlife Service listed threatened or endangered (TE) plant species (none as of 3/96) and Forest Service sensitive (S) species.	No more than 10% of habitat for sensitive species Papaver radicatum var. Pygmaeum and Draba densifolia var. Apiculata are not adversely altered by human uses	Monitor three populations of each sensitive plant where there is a high potential of human alteration to the habitat. Include Anderson Pass site for changes to Papaver radicatum	These plants reside on talus slopes at very high elevations. The potential for habitat alteration by human use is very low.
	Alpine vegetation types slopes 10% potential ground cover	All Classes: 85% of potential	Ground cover measurements taken at selected sites. These will reflect various use levels, including areas of little or no use, which will be used to verify potential for ground cover. Evaluations will be made on a 10-year or longer interval where slow change is indicated	Forest Service Region 4 Standard for ground cover is implied at 85% of potential as a minimum. Ground cover at or near potential is a sensitive indicator for desired plant communities as well as watershed conditions. Monitoring ground cover is direct and relatively simple, requiring only simple equipment. Training required to monitor ground cover rather than species composition is less costly. More detailed information on using ground cover as a management indicator is available at the Ashley Forest Supervisors Office.
	Alpine types slopes 10% potential ground cover	All Classes: 85% of potential		
	Aspen types potential ground cover	All Classes: 85% of potential		
	Riparian types (areas from greenline) potential ground cover	All Classes: 85% of potential		
	Riparian types (greenline*) stream bank stability	All Classes: 85% of potential (standard criteria in "Integrated Riparian Evaluation Guide")	Greenline studies conducted at selected sites. These will reflect various use levels. Evaluations made on a 10-year or longer interval where very slow change is indicated	* For stream types where vegetation has a strong stream bank controlling influence (1 and others), the greenline is an indicator of resource value for fish habitat and other stream functions.
	Natural fire regime	All Classes: 100% of prescribed fires (PF) are managed so fire can play, as nearly as possible, its natural role in the ecosystem	Evaluate all PFs to verify if they are meeting wilderness resource objectives. Evaluate all natural ignitions that are declared wildfires. Determine how similar fires in the future can be maintained in prescribed natural fire (PNF) status.	Restore fire to the wilderness ecosystem by developing prescriptions allowing for unplanned natural ignitions and limited use of planned ignitions to achieve wilderness resource objectives. Suppress fires that may escape the wilderness boundary only if they threaten life, property or resources. Continue fire history studies to verify frequency and size of natural fires for various forest types. Include studies in Engleman spruce, mixed conifer and lodgepole pine dominated forest types.

Resource	Indicator	Standard	Monitoring Plan	Rationale
Vegetation	Tethering stock directly to a tree [Special Order CFR 261.52 (a)]	*All Classes*: Over two hours or sooner if damage to the tree or vegetation at the base of the tree is occurring	Field observation and incident report analysis	When stock are tied to trees for long periods, they excavate wells around the base of trees, exposing and trampling roots (McClaren and Cole, 1993).
	Overnight use or grazing by recreational stock [Special Order 36 CFR 261.57 (e)]	No overnight use or grazing by rec stock in Chain Lakes basin (Uinta drainage)	Field observation and incident report analysis	Pack stock impact wilderness vegetation, soils, water, wildlife and ecotones by defoliating vegetation, trampling, depositing wastes and interacting with wildlife and with visitors. These impacts occur mainly when animals graze vegetation and when they are confined around camps (McClaren and Cole, 1993).

Resource	Indicator	Standard	Monitoring Plan	Rationale
Recreation	Litter human waste [Special Order 36 CFR 261.57 (g)] I	All Classes: Disposing of litter or waste in an inappropriate way	Field observation and incident report analysis	Litter is not a long-term ecological problem, however, is one of the more serious problems in the opinion of wilderness users (Roggenbuck and et al. 1982)
	Campsite density (distance between occupied campsites)	Class I: 80% probability occupied campsites are one mile apart	Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years	Each desired condition class offers varying levels of expectations for solitude. Expectations and assurances of solitude are higher in Class I and reduce accordingly in Class II and II areas. Proximity of occupied campsites to each other is a tangible measure and indicator of solitude
		Class II: 80% probability occupied campsites are 1/4 mile apart		
		Class III: 80% probability occupied campsites are 200 feet apart		
	Campsite assessment rating (modified from campsite assessment rating David Cole defined in 1988)	Class I: 0% campsites have an SII rating greater than 40	Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years	Site Impact Indexes (SII) are calculated from campsite inventories that rate impact data and are weighted according to ecological importance. SII ratings are an indication of accumulated human use changes to the vegetation, soils, and asetics at each campsite. SII ratings above 40 indicate deleterious impacts. SII ratings above 40 indicated a risk that the site will have difficulty recovering from human uses. SII ratings below 40 typically indicate potential for annual recovery of vegetation, soils and asetics. Campsite inventory and monitoring in Grandaddy Basin (1992 and 1996) resulted in a spread of SII ratings of 66-26
		Class II: 10% or fewer campsites have an SII rating greater than or equal to 50		
		Class III: 20% or fewer campsites have an SII rating greater than or equal to 50		
	Group size	Class I: seven people seven stock	Field observation and registration card analysis	Recommended group size for overnight use. Cole (1987) indicates that small parties are critical to avoid the creation of new campsites and trails in little-used places
		Class II: 14 people 15 stock [Special Order 36 CFR 261.58 (f)]		The purpose of this order is to protect natural resources and enhance the visitor's wilderness experience. Studies indicate that most back country visitors prefer not to encounter other people, but if necessary, most visitors preferred contact with smaller rather than larger (over 10-12) groups (Stankey, 1973). Cole (1987) indicates that larger groups can also cause greater resource impacts, particularly in fragile areas or areas that have received little use
		Class III: 14 people 15 stock [Special Order 36 CFR 261.58 (f)]		
	Length of stay at one camps	Class I: 1-2 nights maximum recommended overnight stay	Field observation and incident report analysis	Recommended. Cole (1987) indicates that small parties are critical to avoid the creation of new campsites and trails in little-used places
		Classes II & III: 14 nights at an individual site [Special Order 36 CFR 261.58 (a)]	Field observation and incident report analysis	Interpretation of the 1964 Wilderness Act, "where man is a visitor who does not remain." In addition, this prevents campers from taking up long term residence, and permits sites to be used by other visitors

Resource	Indicator	Standard	Monitoring Plan	Rationale
Recreation	Firewood availability dead woody debris in size class 0.25-4.0 inches including dead wood still attached at base of trees (ground to 7') available for campfire wood within 200' of campsites and comparable unused (control) sites	"Abundant" campfire wood: any activity area greater than or equal to seven tons/acre will be open to campfire wood gathering and campfires will be allowed regardless of intensity of recreational use (standard will be determined after baseline data is collected in 1996) *Class I:* no restrictions *Class II:* no restrictions *Class III:* no restrictions	Data is collected in activity areas along random transects to measure quantity of wood available (tons/acre) for campfires and nutrient cycling. Comparable unused areas (same species/elevation/slope aspect) will be sampled to determine the amount of wood potentially available for campfires. Data transects will be in camping activity areas and within 200' of at least one typical campsite.* The data collected will be evaluated to determine the proportion of potentially available wood (control sites) and actual/% available wood (activity areas) and a standard developed in tons per acre to allocate amount of woody debris available for campfire wood collection (in relation to amount left for nutrient cycling). The amount of woody debris available for campfires will be evaluated utilizing the methodology described in handbook for Inventorying Downed and Woody Material (Brown)	Abundant quantities of dead wood debris are available for campfires while still providing the size classes of wood most important for nutrient cycling within the ecosystem. Cutting down live trees and hacking up dead standing trees occurs only rarely because downed wood is available. No restrictions on campfire use necessary. *Classes I-III:* Visitor use level should not effect availability of small woody debris (twigs-4" branches) for nutrient cycling and campfires.
		"Acceptable" campfire wood: any activity area with greater than or equal to seven tons/acre but less than or equal to seven tons/acre will be open to campfire wood gathering and campfires allowed (standard will be determined after baseline data is collected in 1996) *Class I & II:* Wood gathering and campfires are prohibited within 1/4 mile of the activity area as soon as possible the season the standard is exceeded. *Class III:* Wood gathering and campfires are prohibited with 1/4 mile of the activity area at the beginning of the following season when the standard is exceeded.		Acceptable amounts of campfire wood are available for firewood collection and to provide sustainable nutrient cycling within the ecosystem (monitor closely to avoid reaching the "scarce to no" standard within one season) *Classes I-III:* Acceptable amounts of campfire wood are available for firewood collection and to provide sustainable nutrient cycling within the ecosystem. Cutting down live trees and hacking up dead standing trees occurs only rarely because downed wood is available. No restrictions are necessary. *Class III:* In high use areas, there is not enough dead wood debris for firewood collection and to provide for sustainable nutrient cycling within the activity area. Cutting down live trees and hacking up dead standing trees occurs frequently due to lack of downed wood available for campfires. Prohibit campfires the following season. *Forest visitors typically scavenge for wood within a radius of 2-300' from their campsites (Darvilla, 1979)
		Scarce to no: less than or equal to seven tons/acre (standard will be determined after baseline data is collected in 1996) *Class I, II & III:* Wood gathering and campfires prohibited within 1/4 mile of any activity area where standard is exceeded		Scarce to no dead woody debris available for campfires while still providing the size classes of wood most important for nutrient cycling within the ecosystem. *Class I-III:* All campfire wood collection is prohibited in affected activity area. Also prohibit campfire wood collection if visitor use displaces the effects of campfire wood collection to areas within 1/4 mile.

Resource	Indicator	Standard	Monitoring Plan	Rationale
Recreation	Campfires	In Naturalist Basin (Duchesne drainage) building, maintaining, attending or using a fire or campfire unless in a designated campfire location is prohibited [Special Order 36 CFR 261 52 (a)]	Field observation and incident report analysis	This area has been denuded of downed woody debris and many live and dead trees have been cut to supply campfires with wood, leaving a very unnatural appearance. In addition, large, decaying wood plays a vital part (soil productivity, water retention), in the environment that cannot be replaced by any other component in the ecosystem (Cole and Dalle-Molle, 1982). This regulation is most important where (1) proper fire location, construction and cleanup practices are not followed, and (2) in popular places, where firewood supplies have been depleted (Cole, 1989).
	Outfitting guiding permits	Stock 7*	Administration of permits	Because public need is being met, maintain current number of permits. Offer new permits only if managers recognize a public need not being met by existing outfitters. Offer vacated permits through prospectus based on O G needs criteria. * Currently Yellowstone and Lake Fork are issued as one permit, so the total existing stock use permits equals six.
		Non-stock 4		
	Outfitting guiding service days stock use	Each alternative defines maximum authorized service days available by drainage (see description of alternatives Chapter II). Use same method as above to authorize and increase service days.	Monitor operating plans and actual use reports.	Each drainage was evaluated by wilderness managers. The maximum service days per drainage were decided based on (1) mix of Classes, (2) amount of existing public use, (3) campsite potential (i.e. rocky talus slopes vs. flat ground), (4) historic outfitted use figures, and (5) margin for growth based on O G Needs Criteria (Chapter II).
	Outfitting guiding service days non-stock use outfitters	Each alternative defines maximum authorized service days available by drainage (see description of alternatives Chapter II).		
	Outfitting guiding type camps	*Class I*: Drop camps only, no spike or assigned camps. Over nigh group size limited to seven people and or seven stock.		Assigned and spike camps are inappropriate uses of Class I and III. It is the District Ranger's discretion to determine if and where assigned camps are appropriate in Class II. Drop Camp: Either client and or gear is dropped at an appropriate campsite, uncatered. Spike Camp: Client and gear are moved to new camp either daily or less often, catered. Assigned Camp: Camp outfitted (tents, latrine facilities, etc.) to cater to successive parties of clients. The District Ranger approves and a fee is paid for this site. Camp is removed completely with no cash left behind at the end of the season. (This type camp can eliminate excessive stock use to transport camp equipment and supplies during the season.)
		Class II: Maximum one assigned site per drainage.		
		Class III: Drop camps only, no spike or assigned camps.		

Alternative 1. (preferred) This alternative maintains current conditions across the wilderness, except in Naturalist Basin and the west end of the Highline trail where it directs managers to bring the area up to wilderness standards. Percentages of each Class are calculated to help compare between alternatives

Table II-2. Maximum available service days for outfitted use by drainage = 4400

Drainage	Stock	Non-Stock
Duchesne	0	0
Rock Creek	300	200
Lake Fork	350	600
Yellowstone	300	550
Uinta	900	450
Burnt Fork	150	0
Beaver Creek	150	0
Henrys Fork	0	150
Smiths Fork	0	300
E.M.W.Blacks Fork	250	300
E. Stillwater Fork Bear	50	0
TOTAL	1850	2550

Alternative 2. This alternative responds to comments claiming the other alternatives were too restrictive. It is the alternative with the least restriction/highest human use potential. Percentages of each Class are calculated to help compare between alternatives

Table II-3. Maximum available service days for outfitted use by drainage = 4025

Drainage	Stock	Non-Stock
Duchesne	0	50
Rock Creek	300	200
Lake Fork	350	650
Yellowstone	100	300
Uinta	200	300
Burnt Fork	150	150
Beaver Creek	75	150
Henrys Fork	0	150
Smiths Fork	0	300
E.M.W.Blacks Fork	250	250
E. Stillwater Fork Bear	50	50
TOTAL	1475	2550

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Alternative 3. This alternative is designed to maximize pristine character of the wilderness. Percentages of each Class are calculated to help compare between alternatives

Table II-4. Maximum available service days for outfitted use by drainage = 3125

Drainage	Stock	Non-Stock
Duchesne	0	0
Rock Creek	50	50
Lake Fork	350	600
Yellowstone	300	550
Uinta	75	150
Burnt Fork	25	0
Beaver Creek	50	0
Henrys Fork	100	75
Smiths Fork	125	17
E.M.W.Blacks Fork	200	250
E.Stillwater Fork Bear	25	0
TOTAL	1300	1825

Alternative 4. This alternative is designed to maintain pristine character, while allowing for some increased human use. Percentages of each Class are calculated to help compare between alternatives

Table II-5. Maximum available service days for outfitted use by drainage = 5000

Drainage	Stock	Non-Stock
Duchesne	0	50
Rock Creek	400	500
Lake Fork	400	700
Yellowstone	350	600
Uinta	300	450
Burnt Fork	75	50
Beaver Creek	100	100
Henrys Fork	50	100
Smiths Fork	75	100
E.M.W.Blacks Fork	250	150
E.Stillwater Fork Bear	50	150
TOTAL	2050	2950

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Alternative 5 (No Action). This alternative represents no change from existing management direction. Management of the High Uintas Wilderness continues as prescribed in the Wasatch-Cache and Ashley National Forests Land and Resource Plans. Specific management direction is included in Appendix A.

Forest Plan direction was not developed using the Limits of Acceptable Change process, therefore, no classes are described in the Plan.

In summary current management direction for key areas follows.

Management Prescription for the High Uintas Management Area (WCLRMP IV-63-64)

Manage the wilderness in accordance with the Wilderness Act of 1964 and the Utah Wilderness Act of 1984.

Wilderness. Protect the wilderness resource. Allow ecosystems to function naturally, except for control of fire.

Recreation. Manage recreation to minimize its impact on the wilderness resource.

Wildlife. Allow natural processes to shape wildlife habitat. Allow planting of fish by aircraft to be continued where this use was established prior to passage of the Utah Wilderness Act.

Range. Allow established grazing of livestock to continue, including maintenance of improvements and predator control, as provided for in Title III of the Utah Wilderness Act.

Timber. Harvest no timber.

Water. Allow development, protection, and monitoring of water resources as provided for in Title III of the Utah Wilderness Act.

Minerals. Allow no prospecting, and issue no new leases. Require that development of valid existing claims and leases protect the wilderness resource.

Management Prescription for Management Area I (ALRMP IV-9)

Recreation. No developed recreation sites. Entrance permits or other types of management tools may be necessary to prevent over-use or user conflict. VQO is preservation. Standard service level.

Wildlife. Habitat manipulation by natural means only.

Range. Livestock utilization permitted. Range improvement construction only for the protection of the wilderness resource.

Timber. No harvest. Dead and down materials can be used for fuelwood for on-site use only.

Visual Quality. Common direction - Manage for Visual Quality Objective (VQO) of Preservation.

Water Quality. Ashley NF - No specific direction.

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Wasatch-Cache NF - Resource activities will not be allowed where damage cannot be mitigated to meet Federal, State, and local water quality.

Wildlife and Fisheries. Ashley NF - No specific direction.

Wasatch-Cache NF - Management and improvements for other resources will consider the needs of wildlife.

Campsites. Common direction - A special order issued in 1993 by both Forest Supervisors prohibits, terrain permitting, camping within 200 feet of any occupied campsite, trail, lake, pond, stream spring or any other water source. Camping for a period of more than 14 days at an individual site is also not allowed.

Signs. Common direction - Trail signs should be rustic in design and blend with the wilderness setting. Sign only for boundary control, public safety, resource protection, and direction at trail junction.

Ashley NF - Sign placement follows direction from the Wilderness Sign Handbook.

Wasatch-Cache NF - Place signs as follows:

- Directional signs at system trail junctions only.
- No more than two signs at any junction.
- Boundary signs at the Wilderness boundary.
- "Closed to mechanized vehicles" signs at trailheads or where trails enter the management area.
- Administrative signs, such as "closed to camping", only where necessary for resource protection.
- Interpretive signs, showing key natural features, travel routes and other information at major trailheads outside of the wilderness.

Campfires. Ashley NF - No specific direction.

Wasatch-Cache NF - Prohibits campfires where the firewood supply is depleted and continued fire building threatens the wilderness qualities of the area. By special closure order dated July 6, 1993 campfires are prohibited in Naturalist Basin unless in a designated campfire locations.

Sanitation. Common direction - Construct primitive toilets or sanitary facilities in heavy use areas or if necessary to protect the wilderness resource.

Wasatch-Cache NF - Construct and maintain sanitary facilities necessary to ensure the continued health and safety of watersheds that provide culinary water to communities.

Group Size. Common direction - Group size was established in the 1993 Joint Special Order. Groups are limited to 14 persons and 15 head of stock. Both Plans were amended to reflect this direction (W-C Amendment #9, 6/11/91 and Ashley Amendment #8).

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Trails. Common direction - Redesign and relocate trails where shortcutting of switchbacks is creating erosion problems, to avoid wet meadows, on hillsides where free running water is eroding the tread, where there are multiple, parallel trails

Wasatch-Cache NF - Use may be restricted or prohibited on wet trails in the Duchesne River drainage to prevent damage to trails and the wilderness resource

Outfitters. Ashley NF - Allow five commercial hunting and fishing operations between July 1 and end of the fall season New commercial permits is if there is a demonstrated public need for the service and National Forest resources and programs will not be unacceptably damaged or impaired

Wasatch-Cache NF- Issue special use permits for two fishing/hunting guide and outfitter operations in the wilderness between July 1 and the end of the fall season (Amendment #22, 6/7/94) Use is limited to 300 user days per outfitter New non-horse outfitter guide permits will be allowed if there is a demonstrated public need for the service, National Forest resources and programs will not be unacceptably damaged or impaired, private land is not available to accommodate the use, the commercial use of the area will not interfere with public use

Organizations and Educational Groups. Common direction - Accept one application per organization or group until May 1 then issue permits on a first-come, first-serve basis

Ashley NF - limits use to no more than two groups per District at any one time

Wasatch-Cache NF - Requires that organization groups and educational institutions obtain special use permits according to Forest Service policy with no more than two groups in the wilderness at any one time

Fire. Ashley NF - Wildfire and rarely prescribed fire may be used to reduce fuel loading and to maintain or enhance the wilderness resource

Wasatch-Cache NF - Allow ecosystems to function naturally, except for the control of fire

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chapter three

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AFFECTED ENVIRONMENT

Chapter III

PHYSIOGRAPHIC DESCRIPTION

The Uinta Mountains are carved from an immense anti-clinal uplift, an elongate mountain block whose core of Precambrian rocks was elevated by folding and faulting above the Mississippian, and younger, aged limestone and sandstone sedimentary rocks found along the flanks. This Precambrian core consists of a thick sequence of red and white colored quartzite and shales

The Uinta Mountains rise about 6,000 feet above the Wyoming and Uinta basins which flank them to the north and south. On the north flank the stream valleys and intervening plateaus rise gradually until they meet the steep crest. On the south flank the rise occurs in steep pitches at the Uinta Basin margin and at the crest, separated by a gently sloping plateau.

Within the Uinta Mountains there are 26 summits and subordinate peaks above 13,000 feet (Hansen 1969, p. 14). Nine of these peaks are on the ridge dividing the Uinta and Yellowstone drainages. This ridge contains Kings Peak, which at 13,528 feet, is the highest point in Utah. The lowest point along the Wilderness boundary is 7,520 feet. It is located at the southwest corner of the Wilderness along the Duchesne River in Mill Flat.

The crest area is a high and narrow backbone ridge, truncated by subsidiary spur ridges and subordinate broad ridges and plateaus. These ridges, their related cirque walls and steep talus side slopes are the primary landforms found within the Upper Bolly Landtype Association. Although the cirque walls were carved out by successive advances of Pleistocene (and earlier) glaciers, much of the Upper Bolly landtypes were formed primarily by periglacial processes associated with their close proximity to the large ice sheets, and with the cold snowy conditions of later ice ages.

The main crest and its subsidiary and subordinate ridges divide numerous independent glacial basins. The advance and recession of glaciers through at least two epochs have inflicted varying amounts of scouring and deposition as they moved through the basins and carved out deep "U" shaped stream valleys. These scoured basins and depositional moraines are the primary landforms found within the Alpine Moraine Landtype Association.

Along the northern and southern margins of the High Uintas Wilderness are lower elevation glacial canyons, open parks, wet meadows, broadly dissected residual pediment erosion surfaces, and outwash terraces and plains. These landforms are found primarily in the Late Glacial Deposits and Glacial Canyons Landtype Associations.

Landtypes within the Upper Bolly association contain several important soil development phases Within the Alpine Cresland (UB 3) landtype are found fellfield, meadow, snowdrift slopes, and boulder field phases Soils in the fellfield and steeper boulder field phases are very shallow and weakly developed Within the meadow and snowdrift slope phases are found both wet and dry soils with very thick, humus enriched topsoil horizons On the flatter boulder fields, moderately deep soils with thick humus enriched topsoil horizons have developed Notable exceptions to these conditions are found in the dry meadow and flatter boulder field phases that are part of high elevation sheep grazing and bedding grounds, where hoof traffic and wind erosion have combined to create a marked thinning trend in topsoil thickness (Padgett and Flood, 1994) Within the Talus Slope (UB 1) landtype are found talus field and alluvial outwash phases Within the Cirque Wall (UB 2) landtype are found steep boulder fields

WATERSHED

One of the most important resources within the HUW is its watershed The HUW contains over 500 lakes and innumerable ponds located in glacier basins Most of the natural lakes and ponds are found at elevations above 10,000 feet The High Uinta Mountains annually provide approximately one million acre-feet of high quality water Snow accumulation in the winter provides 80% of the stream flow for major sub-drainages within the Colorado River Basin including Duchesne River, Rock Creek, Lake Fork River, Yellowstone River, Uinta River, Henrys Fork River, and Blacks Fork River It also includes the headwaters for the Provo River and Bear River which flow into the Great Salt Lake The water is used locally and downstream for municipal and culinary water supplies, hydroelectric power generation, irrigation for agriculture, recreation, and support excellent aquatic and fisheries habitat From west to east, south to north we will refer to the eleven major drainages with these names

Duchesne River
Rock Creek
Lake Fork Creek
Yellowstone/Swift Creeks
Uinta Canyon
Burnt Fork Creek
Beaver Creek
Henrys Fork
Smiths Fork
East/Middle/West Fork Blacks Fork
East/Stillwater Fork Bear River

Within the South Slope subsection of the HUW there are five major drainages From west to east they are Duchesne River, Rock Creek, Lake Fork, Yellowstone Creek and Uinta Canyon Creek The elevations at which the five drainages leave the south slope of the wilderness vary from 7,800 feet to 8,400 feet

Within the North Slope subsection of the HUW there are six drainages From west to east they are East/Stillwater Fork Bear River, East/Middle/West Fork Blacks Fork, Smiths Fork, Henrys Fork, Beaver Creek, and Burnt Fork Creek The elevations at which the six smaller drainages leave the north slope of the wilderness vary from 8,200 feet to 10,800 feet

Within the wilderness, the majority of these drainages are in good condition Poor watershed conditions, including insufficient ground cover, accelerated sheet and gully erosion, and significant sediment delivery into live streams and lakes, exist on several of these drainages

Kabell Ridge, above Bear Park on the West Fork of Burnt Fork, has areas of low ground cover, resulting in widespread sheet erosion and deep gullies that are delivering sediment into a small lake to the north and east of Bennion Lake Originally part of a now vacated allotment, conditions are slowly healing and improving

Chesney Bunk, Mansfield Meadows, and Steel Creek Park have areas of fair to poor ground cover that have resulted in headcutting and gullying These gullied watersheds contribute surface water flow into small drainages that feed the East Fork of the Blacks Fork River in the vicinity of Cache Hill, a heavily damaged portion of the current driveway access for sheep bands using high elevation pastures within the wilderness

Flattop Mountain, above Hessie Lake, also has a pattern of well developed gullies, feeding sediments into tributary streams of the East Fork of Smiths Fork Creek Farther upstream is another complex of active, well developed gullies associated with a section of the sheep band access driveway dropping down from pastures on top of Bald Mountain

AIR

Air quality, as measured by visibility and Standard Visual Range, is consistently quite clear a majority of the time. Acid deposition does not appear to be causing the acidification of wilderness lakes or streams at this time. However, high elevation watersheds in the High Uintas Wilderness are dominated by lakes and geology with inherently low acid neutralizing capacity. Consequently, acidification of these ultra sensitive lakes would be a very real possibility in the event of increased atmospheric loadings of acidic chemicals.

VEGETATION

Alpine, subalpine forest, subalpine meadow, and glaciated canyons are habitats for plants of the High Uintas Wilderness. Alpine areas include rounded to nearly flat, broad summits, sharp peaks, cliffs-ledges-talus, and cirque basins above treeline. Many plant species of these areas are common in alpine and arctic areas of the northern hemisphere.

Among the common ones of the rounded or nearly flat summits are alpine avens (Geum rossii), curley sedge (Carex rupestris), moss campion (Silene acaulis), Bellard kobresia (Kobresia bellardii), and blackroot sedge (Carex elynoides). Uinta beardtongue (Penstemon uintahensis) which is endemic to the Uinta Mountains is occasional on the rounded summits and in cirque basins. The cliff-ledge-talus areas provide habitat for many common widespread species, such as sticky sky-pilot (Polemonium viscosum), and for endemics such as Murdock thistle (Cirsium murdockii) and its close relative of wide distribution, Eaton thistle (C. eatonii). Other plants of special interest in these rocky habitats are arctic poppy (Papaver radicatum) and Rydberg parrya (Parrya rydbergii).

Alpine cirque basins support many of the plants common to the rounded summits. However, wet meadows and low-willow fields are more common here, with dominants including water sedge (Carex aquatilis) and planleaf willow (Salix planifolia). Grayleaf willow (Salix glauca) is sometimes common on uplands of these basins.

Subalpine meadows are similar to alpine meadows but commonly support much more timberoat grass (Danthonia intermedia).

Engelmann spruce is the dominant tree at upper elevations of the coniferous forest where grouse whortleberry (Vaccinium scoparium) is the common understory plant. Lodgepole pine is increasingly common with decreasing elevation and is often the dominate tree in the glacial canyons. Riparian areas of the glacial canyons support a high number of shrub, forb, and graminoid species.

Over the vast majority of the High Uintas Wilderness, the indigenous flora is very much intact and highly conducive to wilderness values. Native vegetation dominates the area with introduced weeds mostly confined to low elevations, especially where trailheads are within close proximity of the wilderness boundary. Although domestic livestock grazing has changed composition of the flora in some places, this generally has not been accompanied by

introduction of exotic plant species (Lewis 1970). Where Padgett and Flood (1993) compared vegetation along an active livestock driveway with that of an undisturbed site, they found only species indigenous to the Uinta Mountains at both sites. Lewis (1970) and Padgett and Flood (1993) concluded that bare soil or thinning of plants was of more concern, and a more meaningful and realistic measure of condition and trend, than was species composition.

FIRE

The historic annual fire occurrence and acres burned in the HUW is very low compared to the remainder of the Ashley and Wasatch-Cache National Forests. In the past 21 years, there have been 63 reported statistical human caused fires in the HUW. That accounts for 77% of all the ignitions in the wilderness during that period of time, with only 145.95 acres burned. The 145.95 acres is 5% of the total acres burned since 1974. Usually human caused fires amount to abandoned campfires that are less than 0.10 of an acre in size.

There have been 19 reported lightning caused fires for 23% of all the reported ignitions in the wilderness in the past 21 years.

The number of acres burned is significantly higher due to the Squaw Basin Fire in 1974. Lightning caused fires have accounted for 2986.7 acres burned, which is 95% of the total acreage burned in that period of time.

In many cases, lightning caused fires which are reported by hikers, wilderness rangers, or aircraft are never found. These are usually single tree strikes that go out during the first night. This is especially true from late July through the Fall with the arrival of the monsoon rains. There is a tremendous amount of lightning activity associated with the cumulus cloud build-up over the Uinta Mountains every afternoon. Invariably, there is measurable precipitation in the form of rain and sometimes snow at the higher elevations.

The driest period, when larger fires have historically occurred, is from approximately June 20 until late July or early August. There is cumulus cloud build up during this period of time, but the atmosphere is so dry that precipitation rarely reaches the ground. If it does, it is only at the highest elevations. This phenomenon sets the stage for what is called "dry lightning" or lightning with little or no measurable precipitation.

The largest lightning caused fire in the wilderness in the past 21 years was the Squaw Basin Fire on June 24, 1974. It burned 2,910 acres at an elevation of approximately 8,600 feet on the Duchesne Ranger District of the Ashley National Forest. The primary fuel type was lodgepole pine, with some aspen along the valley bottom of Rock Creek. It has afforded an excellent opportunity to study the ecologic role of fire in the wilderness. By extrapolating from nearby areas, it was obvious that fuel loading in the fire area prior to ignition was low to moderate. Consequently, there were only limited areas of very hot fire. Studies during the summer of 1975 show that the burn area was being revegetated with aspen, lodgepole pine, and numerous forbs and wildflowers. Further observations indicated that there was almost

no accelerated erosion as a result of the fire In addition to providing a living laboratory of continuing studies of vegetation succession, the Squaw Basin Fire demonstrated that fire within the HUW, where fuel loading is low to moderate, does not cause significant resource damage

The largest fire that has occurred in the past 21 years on the Wasatch-Cache National Forest portion of the wilderness was the human-caused Henry's Fork Fire It was ignited on August 3, 1980, and burned 69 acres in spruce at approximately 10,500 feet in elevation

The only other fire of significant size in recent history was the human-caused Swift Creek Fire that occurred on July 20, 1931 It burned 2,085 acres on what is now the Roosevelt Ranger District of the Ashley National Forest in lodgepole pine and spruce at an elevation of approximately 10,000 feet

The largest fires occur on the south side of the HUW The prevailing winds are from the south to southwest which has a direct shot at the south aspects The north slope, for the most part, is sheltered from the prevailing winds Winter snow pack remains longer into the spring and summer months on the north slope than on the south slope Only in drought years are the fuels dry enough on the north slope to produce the potential for large fires The average elevation that lightning fires occur on the south slope is approximately 10,000 feet, while on the wetter north slope there have only been four lightning-caused fires reported in the past 21 years

There is evidence that fires have repeatedly swept over significant areas of the HUW in the past 100 to 130 years In writing about the geologic exploration of the 40th parallel, Wheeler, as reported in Graham (1937), documented that, "In 1871 this survey reached the Uinta Mountains again, where the full complement of topographical work was prevented by forest fires of great extent " Further evidence is given by fire scars on living and dead trees that can be found in most of the forested portions of the Uinta Mountains Also, charcoal layers are a common occurrence in soil profiles

During the summers of 1994 and 1995, a general fire history study was conducted along the south slope of the High Uintas Forty-nine lodgepole pine and 28 ponderosa pine fire scared trees were collected and analyzed from the Roosevelt and Duchesne Ranger Districts Even though none of the fire scar samples were collected in the High Uintas Wilderness, many of the samples were collected very close to the southern boundary in the lodgepole pine and ponderosa pine belts Sample altitudes varied from 7,600 feet to 10,000 feet

The most obvious characteristic of the data is that in 1903 there was a dramatic decrease in the number of fires recorded on the trees Naturally this can be attributed to the beginning of an organized fire suppression effort with the establishment of the Ashley National Forest Between 1880 and 1903 there were 26 fires recorded in fire scars in the lodgepole pine belt on Roosevelt and Duchesne Ranger Districts Most of the fires occurred between 1896 and 1903 Corresponding evidence recorded in the ponderosa pine belt on both Districts which

is located at a lower elevation Again there are very few fire scars recorded after 1903

Another notable distinction of the fire history data was a very high concentration of lodgepole pine trees that began growing between 1849 and 1875 Out of the 49 trees sampled, 28 of them began growing during that 26 year period This could be attributed to wide spread stand replacing fires in the lodgepole pine stands during that period of time Fire scar data in the ponderosa pine belt supports this theory The ponderosa pine belt recorded significant fire activity between 1843 and 1875, indicating that the ponderosa pine survived the fires during this period of time and the lodgepole pine did not, which in turn gave birth to new lodgepole pine stands

The average number of lightning caused fires in the Wilderness in the past 21 years was 0 90 fires/year This average, unlike the average for human-caused fire occurrence, is obviously regulated by the forces of nature Depending on the atmospheric conditions from one year to the next, the area experiences varying levels of lightning ignition potential The most lightning caused fires in one fire season was four in 1974 That particular year was exceptionally dry and windy early in the season which contributed to the magnitude of the Squaw Basin Fire It is possible to go several years in a row without any reported lightning caused fires

A unique geographical characteristic about the HUW is that the main drainages are separated by ridges that are rocky and support little or no vegetation Consequently, fires, regardless of size or intensity, infrequently spread from one drainage to another

Much of the habitat types at the lower elevations of the High Uintas Wilderness are occupied primarily by lodgepole pine The habitat types with persistent lodgepole pine as the seral species or where it forms an apparent climax make up Fire Group Eight (Bradley et al) In Northern Utah, lodgepole pine occurs in a belt from approximately 7,500 to 10,300 feet, and true climax lodgepole pine stands occur only in the Uinta Mountains

Fuels. As described by Aldrich (1973), downed woody fuel loading is divided into two classes small fuels, those less than three inches in diameter, and large fuels, those over three inches in diameter A reconnaissance level fuels inventory was done of the area in the mid seventies which gives a broad picture of the fuels situation in the HUW Seventy-two percent of 117 plots had loadings of small fuels (less than three inches in diameter) in the light to medium loading class with only 28% of the plots in the heavy loading class of greater than five tons/acre

Fire Management Policy. The current fire management policy has been in use since the early 1900's on the Ashley and Wasatch-Cache National Forests Highly sophisticated efficient quick response suppression forces, such as smoke jumpers, and air tankers since World War II, and helicopter repelling in the past 15 years, have not been widely used in the High Uintas This is primarily due to the low occurrence of fires and the minimal size of the average fire in the High Uintas as a general rule Also, the resource values at risk

are relatively low The primary suppression forces that have been used over the years has been, and for the most part still is, two to four fire fighters on foot or horse back with hand tools The response time has been usually quite slow due to the forms of transportation and terrain encountered In many cases, when the fire danger is high there is little the suppression organization could do to stop a larger fire

WILDLIFE AND FISH

Terrestrial Habitat and Species. A variety of mammals, birds, fish, and a few reptiles and amphibians occupy the area; some year long, others as seasonal residents or migrants

The area provides summer habitat for elk, mule deer, moose, bighorn sheep and mountain goats Both the bighorn sheep and mountain goat populations are the result of recent reintroductions

Although bighorn sheep are indigenous to the area, they were not seen after 1970 In 1989, they were reintroduced in the Hoop Lake, Hole in the Rock area Some animals from this herd use the wilderness However, significant acreage of potential suitable habitat remain currently unoccupied These areas include, but are not limited to Naturalist Basin and Grandaddy Basin Bighorns could be reintroduced if total habitat needs are met and potential conflicts with domestic sheep eliminated or minimized

Mountain goats were released on Bald Mountain in 1987 Goats were also released in Whiterocks Canyon in 1989 and 1992 Animals from both of these herds occupy the wilderness for parts of the year

Mammalian predators in the area include black bear, mountain lion, bobcat, striped skunk, coyote, pine marten, fox, mink, badger and weasel The presence of wolverine is not documented, although suitable habitat is present Lynx historically occurred in the High Uintas, but there are no recent records confirming their presence Most of these animals are secretive and seldom seen The wolf and grizzly bear also inhabited the area prior to European settlement

Many common smaller mammals occur also They include deer mice, snowshoe rabbits, golden mantled ground squirrel, yellow bellied marmot, beaver, porcupine and pika

A variety of bird species exist in the area Raptors nesting in the area include, but are not limited to, prairie falcon, owls, golden eagle, American osprey, sharp shinned hawk, Coopers hawk, goshawk, shrike and red tailed hawk Waterfowl occupy the area for the nesting period beginning in early summer and remain through fall migration Waterfowl nesting generally occurs at elevations below 9,000 feet Game birds in the area include blue and ruffed grouse, and ptarmigan White-tailed ptarmigan were planted into the area during the summer of 1976 by the Utah Division of Wildlife Resources and appear to be doing well now Songbirds and neotropical migrants provide the most diversity of all avian groups in the area

Habitats within the wilderness are diverse The vegetation section of this document describes the different habitat types present In addition to those habitats defined by vegetative cover type, there are other special habitats including cliffs, caves, talus slopes, and dead and downed woody vegetation which all support various species of wildlife adapted to them

Threatened, Endangered, and Species of Concern. Federally listed endangered, threatened and proposed species identified by the U S Fish and Wildlife Service

- Peregrine falcon
- Whooping crane
- Bald eagle

U S Fish and Wildlife candidate species and/or Forest Service sensitive species which inhabit or have habitat near or within the High Uintas Wilderness

- Spotted bat
- Boreal owl
- Townsends big-eared bat
- North American lynx
- Flammulated owl
- Colorado cutthroat trout
- Wolverine
- Great gray owl
- Northern three-toed woodpecker
- Northern goshawk
- Spotted frog
- Bonneville cutthroat trout
- Alpine poppy
- Clustered Lady's Slipper

Species of concern. These species are not candidates for official listing, however we list them here because the entire range and distribution of these species are within the High Uintas Wilderness (*) or, it has been listed for similar habitat in Colorado (#)

- Uintah pika*
- Uintah Parrya*
- Uinta Beardtongue*
- Boreal toad#
- Alpine Poppy*

Aquatic Habitat and Species. As defined by UDWR, a fishable lake is any body of water over two acres in area Swamps bogs, ponds and other bodies of water in the Uintas provide nearly 3,000 acres of flat water fishing In addition there are approximately 400 miles of stream fishing Principal gamefish are Colorado and Bonneville cutthroat, eastern brook, and rainbow trout, mountain whitefish, with minor populations of German brown and California golden trout and arctic grayling

Fishless lakes, bogs, swamps and ponds maintain populations of tiger salamanders, great basin spadefoot toads, boreal toads, boreal chorus frogs, northern leopard frogs and aquatic macroinvertebrates

Management. Utah State fishing, hunting and trapping seasons apply to the area All big game animals are hunted including bighorn sheep starting in 1993, and mountain goats in 1991 The state has, for several years, had a bugling bull elk season and a high country buck deer hunt in some areas of the Uintas

Since 1955, the Utah Division of Wildlife Resources has utilized fixed-wing aircraft for restocking lakes The less frequently fished lakes are stocked on a three and four year

cycle, while the more heavily fished lakes are stocked on a one and two year cycle Present policy of the Division is to stock the species and number of fish in each lake that will provide an optimum fishing experience Natural reproduction is also considered in determining stocking needs

Predator control by the Federal Government in the wilderness is done by APHIS-ADC personnel, in consultation with the Forest Service Methods of acceptable control include snars, traps, dogs, and shooting Aerial gunning, M-44s and denning are not allowed

Table III-1 Presence of fish in High Uintas lakes. UDWR defines a lake suitable for game fish, as those 2 acres and above.

	Total number of lakes	Lakes greater than or equal to two acres	Lakes with fish	Total percent of lakes with fish	Total percent of lakes greater than or equal to two acres with fish
North Slope	116	104	98	23%	92%
South Slope	937	278	178	19%	64%
TOTAL	1353	382	276	21%	78%

RANGELAND RESOURCES (by drainage)

- The north end of the *Duchesne River* drainage has never been a livestock allotment, but is grazed by approximately 21 6 AUMs recreation stock annually The Shale Creek area is not grazed by livestock or recreation stock due to inaccessibility The Mill Flat cattle allotment grazes approximately 50 AUMs

- The north end of *Rock Creek* drainage is the unused Fall Creek sheep allotment The Ute Tribe has treaty rights to graze this area, but has not used the allotment since at least 19?? The south end is part of the Rock creek cattle allotment and is used for 50 AUMs per year Sheepherder camps, salt houses or water troughs are located in this unit Recreation stock use in the Rock Creek drainage is approximately 745 AUMS per year

- The north end of *Lake Fork Creek* drainage is the Oweep Sheep Allotment Sheep are trailed into upper Lake Fork Creek and Ottoson Basin over Red Knob and Squaw Passes Annually, 1362 AUMs graze this allotment Sheepherder camps (tent platform, salt house*) are located in upper Lake Fork*, Lambert Meadow, Upper Oweep and Ottoson Basin The southern half of this unit is the Lake Fork cattle allotment grazed by 264 AUMs per year A water trough for cattle is located east of Moon Lake A holding fence and gate is located just inside the wilderness boundary on the Brown Duck trail East Basin is a recreation stock use allotment Recreation stock use in the Lake Fork Creek drainage is approximately 164 AUMS per year

- The north end of *Yellowstone Creek* drainage is the Tungston Sheep allotment This allotment is managed on a rest/rotation schedule of two years on and two years off (alternated with Painter Basin allotment) Sheep are trailed from the north over Smiths Fork Pass When grazed, 570 AUMs are used Sheepherder camps (tent platform, salt house*) are located near Tungston Pass*, near Smiths Fork Pass and west of Kings Lake The south western part of this unit is part of the Yellowstone cattle allotment grazed by 55 AUMs per year The south eastern part of this unit is part of the Dry Gulch cattle allotment, grazed by 184 AUMs per year There are no grazing related improvements

- The north western part of *Uinta Canyon* drainage is the Painter Basin sheep allotment This allotment is managed on a rest rotation schedule of two years on and two years off (alternated with Tungston sheep allotment) Sheep are trailed from the north over Gunsight Pass When grazed, 570 AUMs are used A Sheepherder camp (tent platform, salt house*) is located in Painter Basin* There are no other grazing improvements Formally sheep and cattle allotments (last grazed in 1975, permits waived or allotments closed by 1983), the rest of this unit is now a recreation stock use allotment Recreation stock use in the Uinta Canyon drainage is approximately 164 AUMs per year

- *Burnt Fork Creek* drainage is almost entirely within the vacant Burro Peaks sheep allotment, it has been vacant since 1985 A tiny portion of the Burnt Fork Creek cattle allotment lies in the south east portion of this unit, approximately 120 AUMs are used Sheepherder tent platforms, salt houses

and/or water troughs occur here Approximately 46 AUMs of recreation stock graze this area

- *Beaver Creek* drainage is almost entirely within the vacant Thompson Peak and West Beaver Creek sheep allotments, vacant since 1985. Approximately 854 AUMs graze the Gilbert Peak sheep allotment. Approximately 228 AUMs are grazed on the Beaver Creek and Poison Mountain cattle allotments within the wilderness. Sheepherder tent platforms, salt houses and/or water troughs occur here. Approximately 44 AUMs of recreation stock graze this area

- The *Henrys Fork* drainage is entirely within the Hessie Lake-Henrys Fork sheep allotment. About 854 AUMs are used here annually. Red Mountain cattle allotment grazes 65 AUMs. Sheepherder tent platforms, salt houses and/or water troughs occur here. Approximately 50 AUMs of recreation stock graze this area.

- The southern portion of *Smiths Fork* drainage is within the Red Castle sheep allotment, approximately 858 AUMs graze this area annually. The northern part of this unit is a part of the East Fork Smith Fork, Gilbert Creek and West Fork Smith Fork cattle allotments, about 1150 AUMs graze these areas annually. Sheepherder tent platforms, salt houses and/or water troughs occur here. Approximately 171 AUMs of recreation stock graze this area.

- The *East Middle West Fork Blacks Fork* drainages are within the East and West Forks sheep allotments, 1662 AUMs graze this area annually. Sheepherder tent platforms, salt houses and/or water troughs occur here Approximately 32 AUMs of recreation stock graze this area

- *East Stillwater Fork Bear River* drainage is the northern portion of the East Fork Bear River cattle allotment, approximately 90 C.M.'s graze this area annually. The west portion of the Stillwater drainage is part of the Stillwater sheep allotment. 321 AUMs graze this area annually. Sheepherder tent platforms, salt houses and/or water troughs occur here. The east portion of this unit was grazed by livestock until it was closed in 1960. Approximately 56 AUMs of recreation stock graze this area

WATER STORAGE FACILITIES AND SNOW MEASUREMENT DEVICES

There are seventeen reservoirs, two snow measurement devices one snow course, one aerial marker, and one stream gauge within the wilderness. The following are reservoirs

Lake Fork Creek drainage: Kidney, Island, Little Dog, Clements

Yellowstone Swift Creek: Superior, Drift, Bluebell, Deer, White Miller, Farmers, East Timothy

Uinta Canyon: Lower Chain, Upper Chain, Atwood, Fox, Crescent

Burnt Fork: Island

Snow measurement devices (Sno-tel sites) are located in

Rock Creek: Brinton Meadow

Lake Fork Creek: Upper Lake Fork

Yellowstone Creek: Five Point Lake

There is one snow measurement device in both Lake Fork and Yellowstone. The snow course and aerial marker are in Henrys Fork. The stream gauge is in lower Lake Fork Creek

There are no water storage structures or snow measurement devices within the rest of the wilderness

CULTURAL RESOURCES

Native American sites. Our knowledge of how prehistoric Native Americans used the Uintas Range is not as well developed as our knowledge for most other parts of Utah. However, some limited survey and reconnaissance work over the last several years has significantly increased the number of recorded sites in the High Uintas Wilderness and in immediately adjacent areas.

Four areas in the High Uintas Wilderness have been looked at by teams of Forest Service archeologists, volunteers, and professional archeologists from the State of Utah. These areas are in the Henrys Fork drainage, Garfield Basin, Fox Lake area, and the Fish Lake Island Lake area.

Nearly 100 scatters of chipped stone materials have been found as a result of this work in the wilderness, and many more have also been found in similar settings just outside the wilderness boundary. Most of the material used is a coarse, locally available quartzite that was being fashioned into large scrapers and bifaces. Some fine grained cherts and an occasional piece of obsidian are also in the collections.

A cursory analysis of these materials suggests that most of the movement of these materials into the area may have been from the north, rather than from the south side of the Uintas Range. Obsidian sourcing done on samples indicates that their origins are from at least four locations, including eastern Idaho and Wyoming, near Yellowstone National Park. The styles of the few projectile points found from these

investigations do not argue against the hypothesis of more influence and use from the north side of the range than from the south

Historic sites. Anglo-American use of the Range did not occur until the late 19th Century with exploration and fur trapping by mountain men (William Ashley), government expeditions (John Wesley Powell), military expeditions (Carter Military Road), timber exploitation (particularly tie hacks on the North Slope), and early grazing of domestic sheep and cattle. Each of these uses left its marks on the landscape with roads, trails, and campsites which have deteriorated to rusting can and bottle scatters, or rotting log structures. Dozens of these sites are present within the wilderness, and many more are present in non-wilderness locations nearby.

Few of these sites have been formally recorded by archeologists, but those that have are often in a primary context, that is little disturbed since their abandonment.

RECREATION RESOURCES

Structure.

Landscape (or matrix - a large tract of land where natural and human systems operate) From a visual/recreation viewpoint, the landscape of the HUW is predominately natural appearing, primitive roadless backcountry. According to the Recreation Opportunity Spectrum (ROS) 100% of the landscape in the winter and summer is in the primitive opportunity category.

In the winter, access is severely limited, due to unplowed roads to the trailheads. However, some snow machine users do encroach beyond the wilderness boundary. Tracks into the wilderness have been noted at North Adelaide pass and Bull Park on the North Slope. Some cross-country skiing takes place, most notably a spring organized ski trip to Kings Peak and back to the trailhead in one day. In the summer, use of the landscape is non-motorized, with hiking/backpacking making up about 80% of the use, and saddle and pack stock users 20 percent. Portions of the North Slope are growing increasingly popular during the hunting season.

Recreationists perceives the landscape to be naturally appearing, with minor evidence of humans. Except for areas around lakes, streams, trails and sheep bed grounds, most of the landscape is highly pristine. Natural processes have the greatest influences on vegetative patterns. Unbroken areas of lodgepole pine, vast alpine tundra, talus slopes, nearly impassible stretches of wet willow bottom and large mountain peaks, give the visitor the sense of being "small" in a big country, this reinforces the feeling of solitude. These areas provide an exceptionally pristine recreation opportunity with the landscape characteristic being unmodified by humans.

Patches (small (20-60 acres) areas of land) Throughout the landscape, patches of human-used or developed areas are found. Though they are human-used or developed, they are still predominantly natural-appearing and are perceived as cultural nodes within a natural appearing landscape.

Spread throughout the landscape are dispersed campsites. By far the majority are found within 1/4 mile of a lake or stream, these campsites usually consist of a fire ring, trampled or missing vegetation, and scarred trees. Some also have primitive facilities, like benches, highly developed fire rings or meat poles. Generally, many lakes in the wilderness have more than one campsite at least moderately disturbed by humans. As visitor use increases, camping conditions become more crowded and campsite conditions deteriorate. Users develop new, more pristine sites, and the cumulative effect of more sites and more impacted sites reduces the primitive feel and natural appearance of the area.

Dispersed campsites found along trails share many of the same characteristics as those listed above, however, they tend to provide visitors with "stop over" campsites, as opposed to the destination campsites found around lakes.

Corridors (linear tract of land where travel occurs) Major recreation corridors (trails) are accessed by a variety of trailheads.

- Trails - see drainage descriptions.
- Trailheads - broken out into high, medium and low use sites.

Higher use more developed: parking for 30-50 vehicles, horse use facilities, toilet, trailhead host, paved or maintained gravel road, bulletin board, registration box. Eight to 16% of total use at each: High Line, Grandview, Henrys Fork, China Meadows, Christmas Meadows.

Medium use developed: parking for 10-30 vehicles, some horse facilities, usually a toilet, sometimes a trailhead host, maintained gravel or dirt road, bulletin board, registration box. Five percent of total use at each: Rock Creek, Lake Fork, Swift Creek, Uinta, East Fork Blacks Fork, East Fork Bear.

Light use undeveloped: parking for 1-10 vehicles, no facilities, poor road access, bulletin board. One percent of total use at each: Mirror Lake, Center Park, West Fork White Rocks, Spirit Lake, Hoop Lake, Georges Park, West Fork Beaver Creek, West Fork Blacks Fork.

Flows. The HUW is highly valued by people, for a number of reasons, including backcountry recreation opportunities, ability to find solitude in a primitive setting, sport fishing opportunities, wildlife viewing and hunting opportunities, nature study opportunities, vicarious knowledge of natural processes unhindered by humans, commercial value to county and private businesses (outfitting, tourism, livestock uses, water uses), scenic and ascetic value to local residents and tourists, spiritual value to Ute Tribe members and others, and organized group (church and Boy Scouts) recreation opportunities.

The flow of people, due to these values, across the landscape varies greatly with the season. In the high summer season (mid-June-late August), there is a significant motorized flow of developed site users and sight-seers up the canyons. A relatively small percentage of these use the campgrounds and trailheads to access the wilderness. Most wilderness visitors originate on the

Wasatch-Front and use the Highline, Grandview, Henrys Fork, China Meadows and Christmas Meadows trailheads. Kings Peak is a significant scenic and "challenge" attraction, drawing a large portion of visitors.

In the Fall, the flow and use of the developed sites declines significantly. In the wilderness, the flow pattern begins to change subtly in September, as bow-hunting starts. Bow-hunting brings users into the wilderness, but these wilderness visitors differ from the summer visitors in their campsite selection, and tend to venture more off the trails and into the landscape. This is due to their desire to hunt for game and, while they still wish to experience pristine character, they place an equal or higher value on seeing and finding game.

Another change which becomes more pronounced through the first three weeks of rifle season is the establishment of more developed camps, for use during hunting season (makeshift facilities, larger fire rings, etc.). Weather patterns greatly influence the amount of hunting activity in the wilderness. Generally, by the middle of November, nearly all wilderness recreation has concluded.

Function. In discussing function of the landscape, it is important to note there are three types of people who use the landscape. In an attempt to characterize the range of social values and users present locally, the following categories of users are provided. Trailhead surveys done over the last several years show that the vast majority of High Uintas use comes from local people, those residing in Utah and Wyoming.

Group One: Characterized by people whose traditional roots are local, often but not always living in smaller towns away from the Wasatch Front. These people take strong conservative positions regarding continuance of use patterns for both recreational or economic production. Members of this group may take an active part in attempting to influence the direction land management decisions. Much of this group's composition consists of people with grazing interests, many horse users, big game hunters, outfitters and guides, and some who have fishing as a primary interest.

Group Two: Made up of urban and some non-urban residents, particularly those whose origins and values are different from those of Group One. This group will also take strong positions on issues, often disagreeing with the values of Group One. Group Two values wilderness for its naturalness and individual or small group recreation opportunities. Members of this group may take an active part in attempting to influence the direction land management decisions. Much of this group's composition would be from environmentalists and advocates of more wilderness acreage.

Group Three: Made up of those who do not usually display firm positions regarding public land management. The group is neither urban or rural in place of domicile, but may be found across the area. This group uses the High Uintas less frequently than Group One or Two for recreation. The group is usually not vocal about land management issues, and their opinions will be difficult to discover. Group Three, like Group Two, also has no direct economic dependence on the High Uintas. This group's

values are not as well-defined as those of Group One and Group Two, and members opinions will vary on issues sometimes inconsistently, aligning with Group One or Group Two. This group makes up much of the population. The group is not necessarily "in-between" Group One and Two when considering to its position regarding wilderness. Rather its action and location on any issue is hard to predict. Much of this group's composition is of Boy Scouts, Girl Scouts, and church and other organizational groups, as well as many first time or infrequent users who have not developed strong opinions that might make fall into either Group One or Two.

Landscape (a large tract of land where natural and human systems operate). For people, the wilderness landscape functions as a place to seek enjoyment, knowledge, challenge, solitude, and for some, spiritual renewal. Game habitat, hunting and fishing opportunities are another function that are highly valued by those who participate. A survey completed by the Utah Division of Wildlife Resources in 1993 suggests that 39% of the visitors to the wilderness via the Highline and Henry's Fork trailheads planned to, or did sport fish during their visit. Sixty-one percent of the visitors to these same trailheads did not sport fish.

Another function of the landscape is to serve as a wild area "reservoir." This function, while important to all user groups, is also important to some who will never visit the area. For these people, knowing a large chunk of unroaded and relatively "pristine" ground exists is important.

Both rural and urban people enjoy using the High Uintas for outdoor recreation and other pursuits, but the type of preferred recreation is different.

Preferred Group One Experience: Individual to small or large group participation, usually planned in advance and often repetitively scheduled. Uses traditional gear and means of accessing outdoor areas, including use of horses to access the Wilderness. Likes fireside group activities. May be affiliated with traditional use groups (extended family outings, hunting, fishing, horse-riding groups). Enjoy extractive activities such as catching fish, hunting. Believe some manipulation of the environment may enhance the experience, is good for people and can be good for the setting. To use terminology associated with current Wilderness analysis, the group is more anthropocentric than biocentric in regards to its value systems. Group one works and plays in the outdoors with confidence and knowledge gained through experience.

Preferred Group Two Experience: Participation is more individual or with very small groups, and often opportunistic. Uses high-tech, lightweight gear and typically accesses back-country areas on foot. Often may not use fires (except for emergencies), as these detract from individualism and are perceived as damaging to ecosystems. Affiliated with "environmental" preservation institutions and backpacking organizations. Enjoy feeling that there has been no alteration of the setting as a result of the use. Values wilderness as a biological reservoir, more biocentric than anthropocentric. Enjoy tests of endurance, and skill, risking physical

hardship, thrills and perceived threats may be an integral part of a desirable experience

This group needs the wilderness to fulfill its outdoor recreation needs, of which it is very possessive Traditional large group recreation is perceived as inappropriate because it is damaging to the ecosystem and has social and resource impacts that negatively affect the newer group's experiences

Preferred Group Three Experience
Knowledge base for Group Three is lower than either One or Two for primitive recreation Will follow Group One or Two leads into a variety of situations, and can enjoy participating in either type of experience Usually involved in mid-size to large group wilderness recreation experience because of lack of experience Needs leadership in approaching outdoor experiences and is will to pay for it Generally do not participate in uncomfortable or higher risk activities, this is not a desirable part of the experience The group tends to be anthropocentric rather than biocentric because most have usually not considered the tradeoffs of either choice

As characterized, the social priorities and values of the three groups are often dissimilar, and may create conflicting situations if different groups are placed in proximity All groups value their recreation and social needs Group One also values their expressed economic needs, and wants to keep uses as they have been Group Two, in general, would like to see uses change from the traditional way they have been

Patches (small (20-60 acres) areas of land) Some wilderness campsites function as a place for visitors to experience solitude and enjoy the primitive values of the landscape Additionally, sites themselves are valued, generally more so by group one recreationists who often attach a sense of place to their favorite campsite A good example of this is the long-term "family" fishing camp, where the extended "family" has used the camp for several years Group One recreationists often notice the degradation of existing sites and development of new sites, even though they may not verbalize it other than to say "more people are coming here " Some Group One recreationists cause the worst campsite degradation through highly impactive camping practices

Dispersed campsites, and their development and degradation, are important in relationship to the landscape As these patches are degraded, and new ones developed, the landscape slowly loses its ability to provide the feelings of solitude and remoteness it is valued for

Corridors (linear tract of land where travel occurs) Trailheads and their scale of development serve to influence the number of and destinations of wilderness visitors Trails allow travel into the heart of the area Trails also provide the element of physical challenge or skill

Changes in the condition or existence of corridors greatly affects the landscape and the patches, since that determines "how many, who, and how they travel" into the area

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SOCIAL SETTING AND LIFESTYLES

National or Regional Scale Considerations. The High Uintas Wilderness is part of the National Wilderness Preservation System As such, it should help meet the needs and expectations of all Americans, not just local users While nation-wide scoping for opinions on the management of the High Uintas appears unnecessary and unadvised, our management should provide a setting that meets the intent of the Wilderness Act (1964) Consequently, some comparison to and alignment standards set for other wildernesses of similar size and use ought to help meet the needs of both local and national populations General comparisons with the Wilderness management plans developed in other parts of the West have been made during this analysis, in part to satisfy this concern

An attempt at in-depth analysis of the effects of the alternatives on a national, western, or even regional scale is considered irrelevant

State and Local Considerations. The population of northern Utah and southwestern Wyoming is growing rapidly Census data show that Utah's population has doubled since the early 1960s and quadrupled since the end of World War II More than a million people live within an hours drive of a High Uintas trailhead This growth results from a birth rate that is the highest in the nation, steady immigration to the bait of a booming local economy, and a high quality lifestyle

For Wyoming, growth has not been quite so rapid, but the state's population has nearly doubled since 1950 For the Wyoming counties directly north of the High Uintas, Sweetwater County's population has nearly doubled since 1950 and Uinta County nearly tripled in the same time (Social and Economic Assessment, 1995)

Perhaps even more important than the overall population growth are the lifestyle changes that have accompanied it It's no secret that through the 1970s, 80s, and into the 90s people have increasingly demanded outdoor recreation opportunities Models of future recreation demand always show that demand will outstrip supply within most of our lifetimes (e g Wasatch-Cache 1984, and Ashley, 1985, Land Management Plans)

Supportive technological advances in camping, hiking, fishing, and communications equipment, plus much easier and faster access provided by better roads and vehicles, have made the High Uintas more available than they were a generation ago Forty years ago our forebears risked much longer term discomfort than we do to access the same destinations or acquire similar experiences Clearly, the historic and contemporary recreation experiences are not equal, but today's adventurer can dare to challenge inhospitable surroundings that he or she may not have attempted in years past

All this means more use, especially by many people who are not usually involved in this kind of pursuit or confronted with its hazards and discomforts As with much of American culture, many of us want our cake (i e the beauty and wildness of the Wilderness) and we want to eat it too--on our own late 20th century suburban terms, scheduled conveniently to meet a five-day work week

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and safety-netted to predefined personal limits of safety and comfort

In addition to the broad range of expectations for what a Congressionally designated wilderness or wilderness experience ought to provide, setting desired future conditions for the High Uintas is difficult. For Utah and for much of the West, deciding on whether to have wilderness or not, has been one of the divisive debates of the last few decades. While the Utah Wilderness Act of 1984 provided a statutory solution for what acres were in the High Uintas Wilderness, the law left significant discretion between its legal sideboards on what should be provided after designation. Our users array themselves across the full range of possible management scenarios from very pristine, low-use levels to proponents of uses which are legally inappropriate in wilderness.

Although the Forest Service has done no formal surveys of population preferences, we know that the northern Utah/southwest Wyoming population is not homogeneous in its origins, demands, ethics, or future expectations for the High Uintas. The degree of individual sophistication and interest in wilderness issues, use, and value is also extremely variable. While it is often said that many people who never intend to enter a wilderness benefit vicariously from simply knowing wild places exist, this analysis will not assess the possible effects of this proposal on this diffuse concept.

ECONOMIC ENVIRONMENT

The High Uintas Wilderness Area lies in portions of Summit and Duchesne Counties in Utah, both large, rural counties. Social and economic conditions in Duchesne County are strongly influenced by the Uintah and Ouray Reservation and in Summit County, by the Park City area and nearby Salt Lake City. These and other factors cause social and economic conditions to differ between the counties. These differences will probably continue to increase as the Park City area continues to grow and become more urban. In 1989, household income for Duchesne County (based on 1990 Census data) was $23,569, the second lowest of all Northern Utah counties. Conversely, Summit County was the highest at $36,756. In Duchesne County, about 50 jobs or 1% of the 1990 work force, was employed in the recreation and entertainment industry. In Summit County, about 600 jobs or 6% of the county's 1990 work force was employed in this industry.

There are currently ten outfitter/guide permittees operating within the High Uintas Wilderness Area. Over the 1994 and 1995 seasons, these combined provided an average of 2,170 days of service which generated about $163,000 in gross receipts. It is difficult to precisely estimate the economic contribution of outfitter/guide use to the local area's and state's economies. Assuming a local economic output multiplier of 1.2 and a state-wide economic output multiplier of 1.4 (multipliers suggested in a personal conversation with Bruce Godfrey, Economist - USU Extension, based on data in Utah Economic and Business Review, October 1990), this use contributed an estimated

$196,000 to local economies and $228,000 to the state's economy. Using a different assumption of a state economic multiplier of 2.02 (based on data in The Economic Impact of the Wyoming Outfitting Industry: An Update - 1993, D. Taylor and R. Fletcher, January, 1995), outfitter/guide use in the wilderness generated about $329,000 of the state's economy. (NOTE: For both assumptions on economic multiplier effects both Wyoming and Utah were lumped for this analysis since Wyoming based operations accounted for a very small portion of total dollars generated).

Two stock-use outfitter/guide permittees provide services on the North Slope of the High Uintas Wilderness Area. Both outfitters offer hunting and fishing opportunities. For one of these permittees, the North Slope outfitter/guide operation is an important secondary source of income. For the other operator, the North Slope operation is a small, but important portion of his primary business. One outfitter lives in Uinta County, Wyoming, the other in Cache County, Utah. Both of these High Uintas Wilderness operations are fairly small, each operating under permits authorizing up to 300 service days of use. These two North Slope permittees combined provided an average of 205 days of service within the wilderness on the North Slope over the last 5 years. This use generated approximately $5,500 in gross receipts in 1994 and contributed an estimated $6,600 to the local north slope area's economy. To date, use has never reached permitted levels. Historically, 50-75% of these permittee's clients have resided outside of the Rocky Mountain west. However, in the future the permittees expect to see an increasing number of Utahns taking advantage of their services (personal conversation with the permittees, 3/96).

Four stock-use outfitter/guide permittees provide services on the South Slope of the High Uintas Wilderness Area. These operators offer pack trips, hunting, fishing and other recreation opportunities. One outfitter/guide's home location is in Duchesne County, one is in Summit County, and two are in the Wasatch Front area. Three of these operations provide a primary source of income for their owners. The other operation provides a secondary source of income for its owner. These businesses operate under permits authorizing 300, 300, 400, and 1,500 service days of use within the High Uintas Wilderness Area. To date, use has never reached permitted levels. Over the 1994 and 1995 seasons, these four stock-use outfitter/guides combined provided an average of about 575 days of service. This use generated approximately $75,000 in gross receipts (highest of 1994 or 1995) and contributed an estimated $90,000 to the Uintah Basin's economy. Historically, nearly 20-40% of these permittees' clients have resided outside the Rocky Mountain west (personal conversation with most of the permittees, 3/96). Most permittees are expecting demand for their services to increase in the future, especially as the Utah population grows, diversifies and ages.

Four non stock-use outfitter/guide operations provide services within the High Uintas Wilderness Area. One operation provides opportunities for the public to learn outdoor and wilderness skills and to develop physical fitness and character building. Another operation focuses on teaching wilderness skills and academic subjects. The

other two operations provide opportunities for hiking and teach environmental education, wilderness ethics and other outdoor skills. None of these operations are headquartered in Duchesne or Summit Counties. One is from Indiana, two are from the Denver area, and one is from the Salt Lake area. Two of these operations are run by non-profit organizations. The other two are small parts of medium to large recreation businesses. These businesses operate under permits authorizing one, 120, 500, 700, and 100 service days per season. In the past, use has varied considerably and has sometimes approached or reached the authorized limit for some individual permittees. Over the 1994 and 1995 seasons, these four non-stock outfitter/guides provided an average of about 1,390 days of service. This generated approximately $82,500 in gross receipts (highest of 1994 or 1995) and contributed an estimated $99,000 to the local economy. For three of these operations, over 80% of their clients reside outside the Rocky Mountain west. For the other outfitter/guide, most of the clients reside in the Wasatch Front area. All of these permittees also operate on areas outside of the High Uintas Wilderness Area.

EXISTING CONDITIONS IN EACH DRAINAGE

DUCHESNE RIVER

This 23,000 acre unit lies on the south west end of the Uintas in Summit and Duchesne Counties. The main geographic areas of this unit are: 1) the alpine and subalpine Naturalist Basin (10,000' to 12,428'), 2) the dense coniferous forest mid-elevations (9,000 to 10,000') which contain the main trail corridors, and 3) west facing slopes of the Duchesne River containing Marshall Canyon and Shaler Creek. The headwaters of the Duchesne River occur in Naturalist Basin, and the Duchesne River forms the western boundary of the wilderness. The entire unit was scoured by glaciers creating many alpine lakes, rugged peaks, tundra-like benches, and open meadows.

This drainage receives about 4,000 visits annually with an average stay of 2.5 days. Annual visitation of the Duchesne drainage is 7000 visitor days (5,000 for those traveling and staying in the drainage and 2,000 for the travel time for those camping at Four Lakes and Grandaddy Basin). Fifty percent of these visitors camp at lakes in Naturalist Basin or at Lakes along the Highline Trail. The remaining 50% go to Grandaddy Lakes and Four Lakes where they account for about 3,000 visitor days in the Rock Creek drainage. A small number of visitors cross Rocky Sea pass into Rock Creek.

Most of the use is concentrated adjacent to the larger lakes. These lakes are either stocked with game fish (Yellowstone Cutthroat, brook, and rainbow trout) or regenerate naturally. The remaining lakes are too small or shallow to support fish. Thirty-six percent of the visitors participated in angling as part of their wilderness experience (UDWR 1993). Use begins in mid-June and is heaviest from Independence Day through Labor Day, with some use on weekends in September. There is almost no hunting use in late September and October because most elk and deer move to lower elevations prior to the hunt.

The current Forest Plan permits no outfitter guides in this unit due to the heavy public recreation use and trailheads that are often full and overflow to adjacent areas on weekends and holidays.

There are two primary trails into this unit from the Mirror Lake Highway.

- The Highline Trail (8083) provides access to trails leading to Naturalist Basin, Four Lakes Basin, and Grandaddy Lakes Basin. It begins at Highway 150 (Hayden Pass) and travels nine miles before crossing over Rocky Sea Pass into the Rock Creek Drainage. Spur trails from the Highline Trail provide access to Naturalist Basin and Jordan Lake (8087) via the Jordan Lake Trail (about two miles), Grandaddy Lakes Basin (8088) via the Pinto Lake Trail (about two miles), and Four Lakes Basin (8085) via the Four Lakes Basin Trail (about two miles).

- The Duchesne River Trail (8086) begins at the East Portal of the Duchesne Tunnel (4WD and high clearance vehicle access only) and follows the Duchesne River north and east until meeting with Pinto Lake and Highline trails.

In many places, the Highline Trail is five to eight feet wide with many protruding boulders and wet muddy areas. Some stream crossings are badly eroded from recreational use and many sections have been rerouted multiple times as erosion continues. Trail condition has deteriorated enough that it has been humorously designated "Monster Truck" trail.

Most of the lakes in Naturalist Basin as well as those along the Highline trail exhibit resource deterioration including establishment of numerous, undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics.

Small cirque basins in the trailess Marshall Canyon and Shale Creek areas provide willing visitors with outstanding opportunities for solitude. Very few recreationists visit these two areas and campfires rings are seen infrequently.

Managers for the Highline and Duchesne trails and Naturalist Basin require visitors to obtain a wilderness permit for collecting visitor data. Visitor destinations and length of stay are not regulated by this permit. Naturalist Basin has a fire closure above 10,400 feet due to the lack of suitable firewood, resulting in damage to living trees. A trailhead host contacts most visitors at the trailhead with "leave no trace" information. Destinations are suggested for visitors wanting more solitude than that available at the more heavily used areas.

ROCK CREEK

This 62,069 acre unit lies on the western end of the South Slope of the Uintas in Duchesne County. The main canyon is a typical glacial trough with steep sides and a flat valley floor incised by an inner gorge 100 feet deep in some locations. As the largest drainage on the south slope, it contains Grandaddy and Squaw Basins, with Grandaddy large enough to have an extensive drainage system of its

own The main Rock Creek canyon is divided by Rock Creek and Fall Creek Unique features of the drainage include Rock Creek gorge, greater number of lakes than other drainages on the south slope, and largest area of recent natural fire activity (Squaw Basin)

This drainage received over 14,000 visitor days use in 1994 most of it concentrated around fishable lakes in Grandaddy and Four Lakes Basins Most of the waters lie at the heads of the individual basins Of the 193 waters (lakes, reservoirs, ponds and bogs greater than one surface acre), 46 (24 percent) are either stocked with game fish or regenerate naturally The remaining lakes are too small or shallow to support fish Game fish in this drainage include cutthroat, brook, grayling and rainbow trout

Most overnight camping takes place around the lakes in Grandaddy and Four Lake Basins, the lakes north of Rocky Sea Pass, and to a lesser extent Squaw Lake in the east Most use occurs from mid-June through early September with very heavy use mid-July through mid-August Hunting pressure is light and fluctuates with Fall weather patterns

Two stock use outfitters are permitted and provide approximately 200 service days One to two non-stock outfitters are permitted and provide approximately 50 service days in this drainage Three administrative tent platforms serve wilderness rangers and trail crews as shelters for summer work They are located in Brinton Meadow, near Black Lake and at the mouth of Squaw Basin

Most visitors entering this drainage concentrate in the Grandaddy Lakes area Due to the proximity and ease of access to this area for urban wilderness visitors (along with Naturalist Basin in the Duchesne drainage), it receives the heaviest use on the south slope of the wilderness Most visitors enter Grandaddy and Four Lakes Basins via the Highline and Grandview trailheads The lakes accessed by Rocky Sea pass in the upper Rock Creek drainage are also very popular for visitors entering at the Highline trailhead Visitor use consists mostly people from outside the Uinta Basin (urban and out of state)

This unit has the highest density of trails in the wilderness In addition to an abundance of developed social trails, five main trails serve this drainage

- Rock Creek trail (#1069) provides access along Rock Creek into the head of the drainage It ties into the Highline trail in upper Rock Creek basin 19 miles from Rock Creek trailhead Campsites along the trail are virtually non-existent along the Rock Creek gorge (~14 miles) Lakes in upper Rock Creek are accessed by this trail Use is moderate, horse oriented and consists mostly local Uinta Basin residents

- Squaw Basin trail (#1062) provides access to Squaw and Ottoson Basins (in Lake Fork drainage) It ties into the Lake Fork trail (over Cleveland Pass) 13 miles from where it heads east off the Rock Creek trail The section of trail into Squaw Basin is the most heavily used Use is light to moderate, with a relatively high portion of local Uinta Basin visitors

- Hades-Rocky Sea Pass trail (#1074) provides access into Granddaddy Lakes from the south and north east It ties to the Highline trail 11 miles from the Grandview trailhead Development of the trailhead at the wilderness boundary and an easy four mile hike or ride makes this access to Granddaddy Basin very popular and highly used by locals and non-locals Use is heavy

- Highline trail (#1025) provides access into Four Lakes Basin from the west The Highline trail traverses the entire range and is over 100 miles long from Highline trailhead to its terminus at Highway 191 at the east end of the range Over 60 miles are within the wilderness Spur trails take off to the south into Grandaddy and Four Lakes Basins five and seven miles from the Highline trailhead These sections are very popular and provide access for the majority of visitors into these basins Most are non-Uinta Basin residents Use is very heavy

- Duchesne River and East Fork Duchesne River trails (#1086-1087) provide access into Granddaddy Basin via a spur trail from the west The Duchesne River trail parallels the Duchesne River, the East Fork Duchesne River trail takes off to tie into the Pinto Lakes cutoff trail a total of six miles from Mirror Lake trailhead Steeper climbs than the Highline trail prevent this access into Grandaddy Basin from getting as much use It is popular with stock users Use is light to moderate

Much of Grandaddy and Four Lakes basins exhibit resource deterioration including establishment of numerous, undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics Small cirque basins in the main Rock Creek and the trailless Shale Creek area provide willing visitors with outstanding opportunities for solitude

No rules or regulations specific to this drainage, and in addition to those already established for this wilderness, are in effect However, for several years, Grandaddy Basin restricted group size to 12 people and 15 horses In 1993 managers relaxed this restriction to 14 people and 15 horses so that it would be compatible with the rest of the wilderness

LAKE FORK CREEK

This 63,081 acre unit lies on the south slope of the Uintas in Duchesne County The main canyon is a typical glacial trough with steep sides and a flat valley floor incised by an inner gorge 100 feet deep in some locations It contains three large cirque basins (Brown Duck, East, and Ottoson) The main Lake Fork canyon is divided by Lake Fork Creek and Oweep Creek Unique features of the drainage include Uinta Creek gorge, fewer lakes in the head of the drainage than the other drainages, historic evidence of dam building human influence, trailless Oweep basin, and heavy use by organized groups in and through Brown Duck basin

This drainage received approximately 13,000 visitor days use in 1994, most of it concentrated around fishable lakes Most of the waters lie on the west side of the drainage Of the 212 waters (lakes, reservoirs, ponds and bogs greater than one

surface acre), 38 (18 percent) are either stocked with game fish or regenerate naturally The remaining lakes are too small or shallow to support fish Game fish in this drainage include cutthroat, brook, grayling and rainbow trout Most overnight camping takes place near Brown Duck, Kidney, Island, Clemens, Picture, Crater lakes in the west and Lambert lake in the east Most use occurs from mid-June through early September Hunting pressure is light and fluctuates with Fall weather patterns

One stock use outfitter is permitted and provides approximately 200 service days One to two non-stock outfitters provide approximately 450 service days in this drainage Two administrative tent platforms are located in this unit, the one in upper Lake Fork has not been used for at least eight years The one in Brown Duck is being dismantled

Most visitors to this drainage concentrate in the Brown Duck area It receives heavy use from Boy Scout groups participating in the popular 50 mile hike that starts at Mirror Lake and ends at Moon Lake or vice versa An undetermined amount of visitors enter the basin from the north slope over Red Knob and Squaw passes These visitors use the Highline trail, traveling through the basin into Yellowstone Visitor use is nearly split between local Uinta Basin residents and urban residents

This unit is served by three main trails

- Lake Fork trail (#1061) provides access along Lake Fork Creek into the head of the drainage It ties into the Highline trail in upper Lake Fork basin 20 miles from Lake Fork trailhead Campsites along the trail are virtually non-existent along the Lake Fork Creek gorge (~14 miles) No lakes are directly accessed by this trail Use is light

- Brown Duck trail (#1062) provides access to Brown Duck, East and Ottoson basins It ties into the Ottoson Basin trail at Cleveland Pass 18 miles from the Lake Fork trailhead The section of trail from the Lake Fork trailhead into Brown Duck Basin is the most heavily used trail in the west side of the Lake Fork drainage, most camping occurs around Brown Duck and Kidney Lakes The first six miles of trail are also used as a stock driveway

- Tworoose Pass trail (#1065) provides access from Brown Duck Basin to Squaw Basin in the Rock Creek drainage It ties to the Ottoson Basin trail six miles from the Brown Duck trail This route is part of an extremely popular loop for Boy Scouts

In higher used areas resource deterioration includes establishment of numerous, undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics

Aside from popular fishing lakes, the majority of the drainage (especially the less accessible cirque basins and trailless Oweep basin) provide willing visitors with outstanding opportunities for solitude

No rules or regulations specific to this drainage, in addition to those already established for this wilderness, are in effect

YELLOWSTONE/SWIFT CREEKS

This 72,452 acre unit lies on the South Slope of the Uintas in Duchesne County The main canyon is a typical glacial trough with steep sides and a flat valley floor incised by an inner gorge 100 feet deep in some locations It contains three large rocky cirque basins (Garfield, Tungsten and Swasey Hole) Swift Creek drains into Yellowstone Creek and contains Timothy and Farmers Lake Basins Unique features of the drainage include Yellowstone Creek gorge, historic evidence of sheep herding and dam building, and popular approach to Kings Peak via Anderson Pass, Smiths Fork Pass and China Meadows trailhead

This drainage received approximately 13,000 visitor days use in 1994, most of it concentrated around fishable lakes Of the 220 waters (lakes, reservoirs, ponds and bogs greater than one surface acre), 37 (17 percent) are either stocked with game fish or regenerate naturally The remaining lakes are too small or shallow to support fish Game fish in this drainage include cutthroat, brook, and rainbow trout

Most overnight camping takes place near Five Point, Gem, Drift, Spider, and Bluebell lakes in the west and E Timothy, Farmers, White Miller and Dear lakes in the east Most use occurs from mid-June through early September Hunting pressure is higher in the Yellowstone drainage than Uinta or Lake Fork and fluctuates with Fall weather patterns

One stock use outfitter is permitted and provides approximately 110 service days One to two non-stock outfitters provide approximately 550 service days in this drainage Two administrative tent platforms are located in this unit, the one in Swift Creek near White Miller lake has not been used for at least eight years The one in Garfield Basin has been dismantled except for the 14'X14' platform

Most visitors entering the area to climb Kings Peak do not spend the night in the Yellowstone drainage, however they do traverse the upper portion of Tungsten Basin to access Anderson Pass from Smiths Fork Pass This route is not as heavily used as the Gunsight Pass route in Uinta Garfield Basin (Five Point Lake) and upper Swift Creek Basin receive the majority of recreation use in this drainage Most visitors to these areas are local Uinta Basin residents

This unit is served by five main trails

- Yellowstone trail (#1057) provides access along Yellowstone Creek into the head of the drainage It ties into the Highline trail in Painter Basin 20 miles from Swift Creek trailhead Campsites along the trail are virtually non-existent along the Yellowstone Creek gorge (~12 miles) No lakes are directly accessed by this trail Use is light to moderate

- Five Point Lake (#1058) provides access to Garfield Basin It ties into Swaseys Hole trail five miles from the Yellowstone trail This is the most heavily used trail in the west side of the Yellowstone drainage, most camping occurs around Five Point Lake The trail is in good condition

• Swasey Hole trail (#1059) provides access to Swaseys Hole, Garfield Basin and the head of Garfield Creek. It ties to the Highline trail 18 miles north of Center Park trailhead. Swasey Hole is popular with local residents, although the rough road to Center Park trailhead seems to keep visitation to this area relatively low. The low pass and boggy areas need significant trail rehabilitation for safety and resource protection.

• Swift Creek trail (#1056) provides access into the east portion of the drainage from the mouth of Yellowstone Canyon. It ties into the Jackson Park trail nine miles from the Swift Creek trailhead. It accesses Farmers Lake Basin, where fishing, campsites and horse feed are available. This is popular trail with local residents and its use is equivalent to Five Point trail.

• Jackson Park Trail (#1055) provides access into the east portion of the Swift Creek drainage from Jackson Park. After looping through the Timothy Lakes, it climbs Bluebell Pass and ties into the Yellowstone trail 21 miles from the Jackson Park trailhead. The first 15 miles from Jackson Park trailhead is an old cat road constructed to transport heavy equipment into the basin to work on reservoirs. It is now primarily used as a stock trail to move cattle into the area. Little healing of the old road has occurred and a four-wheel drive vehicle can still drive to East Timothy Lake. Other than as a stock driveway, the trail receives very little use, as Jackson Park trailhead is nearly inaccessible by two-wheel drive vehicles.

In higher use areas, resource deterioration includes establishment of numerous, undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics.

Aside from popular fishing lakes, the majority of the drainage (especially the less accessible cirque basins) provides willing visitors with outstanding opportunities for solitude.

No rules or regulations specific to this drainage, in addition to those already established for this wilderness, are in effect.

UINTA CANYON

This 73,710 acre unit lies on the south slope of the Uintas in Duchesne county. The main canyon was scoured by the Uinta Glacier. Several cirque basins, including Atwood, Krebs, Painter and eight others to the north and east, drain into the Uinta River. Unique features of the drainage include Uinta River gorge, sweeping alpine area of Painter Basin, visually distinctive Mt. Emmons rising 1,800 feet from the basin floor, popular east approach to Kings Peak via Anderson Pass, Gun Sight Pass and Henrys Fork trailhead, and evidence of prehistoric use above tree line.

This drainage received approximately 13,000 visitor days use in 1994, most of it concentrated around fishable lakes. Of the 352 waters (lakes, reservoirs, ponds and bogs greater than one surface acre), 46 (13 percent) are either stocked with game fish or regenerate naturally. The remaining lakes are too small or shallow to support fish. Game fish in this drainage include cutthroat, brook, golden, and rainbow trout.

Most overnight camping takes place near Fox, Kidney, Chains and Atwood Lakes. Most use occurs from mid-June through early September. Due to early snows and poor trail and pass conditions in the Fall, hunting use is light. Although some hunting occurs in the Fox Lake and North Fork Park areas.

One stock-use outfitter is permitted and provides approximately 100 service days. One to two non-stock outfitters provide approximately 300 service days in this drainage. Two administrative tent platforms are located in this unit, the one in Atwood Basin has not been used for a couple years. The one near Samuels Lake is being dismantled.

Most visitors entering the area to climb Kings Peak do not spend the night in the Uinta drainage. They traverse the upper portion of Painter Basin to access Anderson Pass from Gunsight Pass. This is the most heavily used area in the drainage.

This unit is served by four main trails.

• Uinta River trail (#044) provides access into the east portion of the drainage from the mouth of Uinta Canyon. It ties into the Highline trail in Painter Basin 30 miles from Uinta trailhead. Campsites along the trail are virtually non existent along the Uinta River gorge (~12 miles). No lakes are directly accessed by this trail. Use is light to moderate.

• Fox-Queant trail (#1047) provides access from the west into the drainage from Fox-Queant Pass. It ties into the Highline trail seven miles from the West Fork of Whiterocks trailhead. From the wilderness boundary at Fox-Queant Pass, most camping occurs around Fox Lake. The trail is in fair condition, with the pass needing significant water diversion work. Use is moderate to high for this drainage.

• Highline trail (#1025) traverses 17 miles across the drainage from North Adelaide Pass in the east to Anderson Pass in the west. Kidney Lakes are the most highly visited areas along this relatively lightly used trail.

• Chain Lakes-Atwood trail (#1043) provides access into the west portion of the drainage from the mouth of Uinta Canyon. It ties into the Highline trail 22 miles from the Uinta trailhead. It accesses Krebs Basin, Chain Lakes and Atwood Basin, where fishing, campsites and horse feed are plentiful. Along with the Fox-Queant trail, the first 18 miles of this trail are the most highly used by visitors to this drainage.

An old cat road built to transport heavy equipment into the Chain Lakes area starts at Jefferson Park and ties into the Chain Lakes-Atwood trail approximately one mile above the Sheep Bridge. From there to Chain Lakes it parallels the system trail and is revegetated.

In higher use areas, resource deterioration includes establishment of numerous, undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles,

parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics

Aside from the Kings Peak access route and popular fishing lakes, the majority of the drainage (especially the less accessible cirque basins) provides willing visitors with outstanding opportunities for solitude

Rules or regulations specific to this drainage and in addition to those already established for this Wilderness are in effect only in the Chain Lakes basin Due to over-grazing recreational stock, no overnight stock use is permitted

BURNT FORK CREEK

This 23,084 acre unit lies on the North Slope of the Uintas in Summit County, Utah It received approximately 6,000 visitor days use in 1994, most of it concentrated around fishable lakes There is significant use coming into the area from Spirit Lake, however at this time there is no facility to record use at the trailhead located there

Most visitors are either there to fish or to hunt elk This drainage does not have outstanding unique characteristics when compared to the other wilderness drainages Larger lakes are either stocked with game fish or regenerate naturally The remaining lakes are too small or shallow to support fish Game fish in this drainage include cutthroat and brook trout

One stock use outfitter is permitted and provides approximately 50 service days Most overnight camping takes place in the upper portion of the drainage where the lakes are concentrated, especially near Fish Island and Kabell Lakes However, there are a significant number of camps scattered along the trails and in the numerous meadows During the hunting season there is a concentration of use Hunters naturally scatter throughout an area to increase chances of success

This unit is served by eight trails

- North Side Highline Trail (#105) provides access across the drainage from Beaver drainage to the west to Spirit Lake to the east Use is moderate on the west segment and heavy on the central and eastern segments

- Burnt Ridge Trail (#121) provides access from Hoop Lake, and makes connections with Thompson Peak Trail (#108), Kabell Meadows Trail (#122), and North Side Highline Trail (#105) Use is moderate

- Kabell Meadows Trail (#122) provides access from Hoop Lake through Kabell Meadows and connects to North Side Highline Trail (#105) This is the most popular access to Kabell Lake area Use is heavy

- Kabell Lake Trail (#113) provides final access to Kabell Lake from Kabell Ridge and Kabell Meadows Trails Use is heavy

- Kabell Ridge Trail (#113) provides access from Kabell Meadows to Island Lake Trail Kabell Lake Trail takes off from this trail Also connects with North Side Highline Trail (#105) Use is heavy

- Island Lake Trail (#124) provides access to Island Lake from Kabell Ridge Trail and trail #105 Also crosses over to Ashley National Forest to Divide Lake Use is heavy

- Burnt Fork Trail (#125) provides access from Burnt Fork Trailhead, along Burnt Fork to connect with North Side Highline Trail (#105) between Fish Lake and Island Lake Use is moderate to heavy during hunting season

- Fish Lake Trail (#127) provides access from trailhead at Beaver Meadows Reservoir to Fishlake Crosses North Side Highline Trail (#105) just below Fish Lake Use is moderate

Site deterioration has resulted in the establishment of numerous, undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics Finding solitude and a quality wilderness experience is difficult when in the vicinity of the main access trails or around the heavier used lakes However, the drainage is broad enough that by leaving the trails and heavier used lakes behind, willing visitors can find outstanding opportunities for solitude

No rules or regulations specific to this drainage, in addition to those already established for this wilderness, have been developed

BEAVER CREEK

This 30,855 acre unit lies on the North slope of the Uintas in Summit County, Utah It is a moderately visited drainage receiving over 3,100 visitor days use in 1994 Most visitors are either there to fish or to hunt elk When compared to the rest of the wilderness, this drainage does not have any outstanding unique characteristics, however, it does contain a number of fishable lakes within one to two miles of the trailhead that receive only light fishing pressure

Larger lakes are either stocked with game fish or regenerate naturally The remaining lakes are too small or shallow to support fish Game fish in this drainage include cutthroat and brook trout

Most overnight camping takes place in the upper portion of the drainage where the lakes are concentrated, especially near Gilbert, Beaver, and Coffin Lakes However, there are a significant number of camps scattered along the trails and in the numerous meadows During the hunting season there is a concentration of use Hunters naturally scatter throughout an area to increase chances of success

One stock-use outfitter is permitted and provides approximately 50 service days

This unit is served by six trails

- North Side Highline Trail (#105) provides access across the drainage from Henrys Fork drainage to the west to Burnt Fork drainage to the east Use is moderate to heavy

- Joulious Creek Trail (#118) provides

access from Bullocks Park, through Joulious and Deadhorse Parks to North Side Highline Trail (#105). Use is moderate.

- West Fork Beaver Ck. (#119) provides access along creek from West Fork Beaver Ck. Trailhead to Gilbert Lake. This is the most popular access to Gilbert Lake. Moderate to heavy use especially during hunting season.

- Beaver Lake Trail (#109) provides final access to Beaver Lake from North Side Highline Trail (#105) in vicinity of Long Meadows. Use is heavy.

- Middle Fork Beaver Ck. (#120) provides access along creek from Middle Fork Beaver Ck. Trailhead to Long Meadows just below Beaver Lake. Most popular access to Beaver Lake area. Use is moderate to heavy especially during hunting season.

- Thompson Peak Trail (#108) provides access from Burnt Ridge Trail in Burnt Fork drainage to North Side Highline Trail (#105) near Corral Meadows. Use is light to moderate during hunting season.

Site deterioration has resulted in the establishment of numerous undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics. Finding solitude and a quality wilderness experience is difficult when in the vicinity of the main access trails or around the heavier used lakes. However, the drainage is broad enough that willing visitors can find outstanding opportunities for solitude.

No rules or regulations specific to this drainage, in addition to those already established for this wilderness, have been developed.

HENRYS FORK

This 14,987 acre unit lies on the North slope of the Uintas in Summit County, Utah. It is a heavily visited drainage receiving over 15,360 visitor days use in 1994. Most visitors are either there to fish or to climb Kings Peak. The drainage is unique when compared to other North Slope drainages within this wilderness because it affords the shortest access to Kings Peak, the tallest point in Utah at 13,528 feet.

Larger lakes are either stocked with game fish or regenerate naturally. The remaining lakes are too small or shallow to support fish. Game fish in this drainage include cutthroat and brook trout.

Most overnight camping takes place in the upper portion of the drainage where the lakes are concentrated, especially near Bear, Sawmill, Grass, Island, Henrys Fork, and Dollar Lakes. The lakes closest to Kings Peak, such as Dollar and Henrys Fork Lakes, receive a greater number of visitors heading for the peak. There are a few scattered campsites along the trail in the lower portion of the drainage and around Alligator Lake, which is approximately two miles from the trailhead.

One to two non-stock outfitters provide approximately 100 service days in this drainage.

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The Henrys Fork drainage is served by five trails.

- North Side Highline Trail (#105) provides access across the drainage from Smiths Fork drainage to the west to Beaver Fork drainage to the east. Use is light to moderate.

- Dahlgreen Trail (no # 114) provides access from wilderness boundary near Dahlgreen Creek to North Side Highline Trail (#105). Use is light to moderate during hunting season.

- Henrys Fork Trail (#117) is the main access trail from Henrys Fork Trailhead up through the drainage and over Gunsight pass. This is the most popular access to Kings Peak. Very heavy use.

- Basin Trail (# 116) provides access around western part of upper basin and area of most lakes. Use is heavy.

- Big Meadows Trail (#114) provides access from wilderness boundary near Dahlgreen Creek to North Side Highline Trail (#105). It parallels Dahlgeen Trail. Use is light to moderate during hunting season.

Site deterioration has resulted in the establishment of numerous undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness aesthetics.

Finding solitude and a quality wilderness experience is quite difficult when in the vicinity of the main access trail or around the heavier used lakes. Meeting 40 or more people in one day during the week, or over 100 on weekends is common. The drainage is very popular for Boy Scout groups.

No rules or regulations specific to this drainage, in addition to those already established for this wilderness, have been developed. However, fire closures above Elkhorn Crossing are being considered to try to disperse campers lower in the drainage and to reduce further campsite deterioration due to firewood collecting, fire ring construction, and accumulations of blackened coals and half burned logs.

SMITHS FORK

This 27,884 acre unit lies on the North slope of the Uintas in Summit County, Utah. It is a heavily visited drainage receiving over 16,000 visitor days use in 1994. Most visitors are either there to fish or to sight-see. The drainage is one of the most picturesque with Red Castle Peak providing a back drop at the head of the drainage.

Larger lakes are either stocked with game fish or regenerate naturally. The remaining lakes are too small or shallow to support fish. Game fish in this drainage include cutthroat and brook trout.

Most overnight camping takes place in the upper portion of the drainage where the larger lakes are concentrated and the scenery spectacular, especially near Lower Red Castle Lake and to a lesser degree, East Red Castle Lake. There are campsites scattered along the trail in the lower portion of the basin with a small concentration in the Broadbent Meadows area. Hessie Lake

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receives heavy use because it is the closest sizeable lake to China Meadows trailhead

One to two non-stock outfitters provide approximately 100 service days in this drainage

The Smiths Fork drainage is served by six maintained trails

- North Side Highline Trail (#105) provides access across this unit from East Fork Blacks Fork to Henrys Fork. Hessie Lake is served by this trail. Use is light on western segments to very heavy on eastern segments.

- West Fork Smiths Fork (#107) provides access from wilderness boundary on West Fork Smiths Fork to North Side Highline Trail (#105). Use is light.

- East Fork Smiths Fork (#110) provides access from China Meadows Trailhead to Red Castle Lake. Heaviest used trail in drainage.

- Bald Mnt. Trail (#111) provides access from East Fork Blacks Fork to East Fork Smiths Fork Trail just below Lower Red Castle Lake. Use is moderate to heavy.

- Smiths Fork Pass (#111) is actually an extension of Bald Man. Trail. It provides access from East Fork Smiths Fork Trail, just below Lower Red Castle Lake, over Smiths Fork Pass to Yellowstone Creek on the South Slope. Use is heavy.

- Bull Park Trail (no #) provides access from wilderness boundary between Gilbert Meadows and Bull Park to North Side Highline Trail (#105). Use is usually light, but heavy during hunting season.

Site deterioration has resulted in the establishment of numerous undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics. Finding solitude is quite difficult near the main access trail or around the heavier used lakes such as Lower Red Castle and Red Castle Lakes. Meeting numerous groups totaling 40 or more people in one day during the week, or over 100 on weekends is common. The drainage is very popular for Boy Scout groups.

No rules or regulations specific to this drainage, in addition to those already established for this wilderness, have been developed. However, fire closures above the third bridge are being considered to try to disperse campers lower in the drainage and to reduce further campsite deterioration due to firewood collecting, fire ring construction, and accumulations of blackened coals and half burned logs.

EAST/MIDDLE/WEST FORK BLACKS FORK

This 38,888 acre unit lies on the North slope of the Uintas in Summit County, Utah. It is a heavily visited drainage receiving over 4,700 visitor days use in 1994, concentrated mostly within the Little Fork Blacks Fork drainage. In the West Fork, most visitors come to fish, but it is a highly picturesque valley and many visitors come for the scenery. The drainage is unique when compared to other North Slope

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drainages within this wilderness in that the valley bottom is quite open. The lakes in the upper basin get heavily used since a trail from the South Slope also accesses this drainage.

Larger lakes are either stocked with game fish or regenerate naturally. The remaining lakes are too small or shallow to support fish. Game fish in this drainage include cutthroat and brook trout.

Most use is concentrated along the western bench in the Little East Fork. This is where the most popular fishable lakes are located and use is heavy. Bob's Lake, in the head of the Middle Fork, receives light fishing pressure. In the Little East Fork, campsites are concentrated around the two northern most lakes on the western bench above the valley bottom. The other lakes have little or no shelter for camping.

In the West Fork, most overnight camping takes place in the upper portion of the drainage around Dead Horse Lake. It has sheltered campsites, whereas Ejod Lake is completely in the open.

One stock-use outfitter is permitted and provides approximately 50 service days.

The East/Middle/West Fork drainage is served basically by five maintained trails

- Middle Fork Blacks Fork Trail (#096) provides access from the end of the Middle Fork Blacks Fork Road to Bob's Lake. Use is light. No marked trailhead exists at this time.

- East Fork Blacks Fork Trail (#102) provides access from the East Fork Blacks Fork Trailhead up through the East Fork Blacks Fork drainage to Red Knob Pass and the Highline Trail, which goes down to Dead Horse Lake or into the Lake Fork drainage. Use of this trail is moderate.

- Little East Fork Blacks Fork Trail (#103) provides access from the East Fork Blacks Fork Trail, up through the drainage and over Scuaw Pass. Oweep Creek is on the other side of this pass on the South Slope of the Uintas on the Ashley National Forest.

- West Fork Blacks Fork Trail (#101) provides access from the West Fork Blacks Fork Trailhead to Dead Horse Lake. Use is moderate.

- Highline Trail (#102) provides access from the Ashley side to Dead Horse Lake from Dead Horse Pass and Red Knob Pass. Use is moderate to heavy. Large groups will use this trail.

Site deterioration around the two lakes where camping is concentrated in the Little East Fork has resulted in the establishment of undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics.

Finding solitude is quite difficult when in the location of the main access trail or around the heavier used lakes mentioned above. The West Fork drainage is narrow and quite open, finding complete solitude is difficult. Dead Horse Lake is popular for large groups.

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traveling the Highline Trail. However, solitude can be found in the East Fork and Middle East Fork Blacks Forks where use is light at present.

No rules or regulations specific to this drainage, in addition to those already established for this wilderness, have been developed.

EAST/STILLWATER FORK BEAR RIVER

This 27,362 acre unit lies on the North Slope of the Uintas in Summit County, Utah. It is a heavily visited drainage receiving over 8,000 visitor days use in 1994. Most visitors come to fish. The East Fork Bear River Boy Scout Camp lies directly adjacent to the trailhead servicing this drainage. The Stillwater Fork is heavily visited with use concentrated within a fairly narrow drainage. The drainage is one of the most picturesque with Oster Peak providing a back drop at the head of the drainage.

Larger lakes are either stocked with game fish or regenerate naturally. The remaining lakes are too small or shallow to support fish. Game fish in this drainage include cutthroat and brook trout.

Most overnight camping takes place in the upper portion of the drainage where the lakes are concentrated. There are a few scattered campsites along the trail in the lower portion of the drainage mostly used by scout groups. Hell Hole Lake lies in the north west corner of the wilderness and presently receives only moderate use since there is no developed trailhead servicing it.

In the upper basins, campsites tend to be concentrated around Ryder and McPheters Lakes in Middle Basin, Amethyst and Ostler Lakes in Amethyst Basin, and Kermsuh Lake in West Basin. These lakes are also popular fishing lakes.

One stock-use outfitter is permitted and provides approximately 50 service days.

The Stillwater and East Fork Bear River drainage is served by six trails.

- East Fork Bear River/Right Hand Fork Trail (#100) provides access from the trailhead, past the trail forks and up the Right Hand Fork to Norice and Priord Lakes. Use is heavy since the narrow confines of the drainage concentrate visitors along the stream and around the two fishable lakes.

- Left Hand Fork Trail (#151) provides access from Est Fork Bear River/Right Hand Fork Trail (#100) to Allsop Lake in the Left Hand Fork. Use is heavy. The narrow confines of the drainage concentrate visitors along the stream and around the single fishable lake.

- Hell Hole Trail (no #97) provides access to Hell Hole Lake from Highway 150 near the Gold Hill Road junction. Use is light, no marked trailhead exists at this time.

- Stillwater Trail (#098) provides access from Christmas Meadows Trailhead to Middle Basin (Ryder and McPheters Lakes). Use is heavy.

- Kermsuh Lake Trail (#139) provides access from Stillwater Trail to Kermsuh Lake. Use is moderate.

- Ostler Fork Trail (#149) provides access from Stillwater Trail to Amethyst Basin. Use is heavy.

Site deterioration around the heavier used locations such as Amethyst, Ryder, McPheters, and Ostler lakes has resulted in the establishment of undesirable campsites, depletion of wood supplies, litter, undesirable pickets, compacted soils at campsites, fire circles, parallel trails in wet areas, depletion of vegetative cover, and general deterioration of wilderness esthetics. Finding solitude and a quality wilderness experience is quite difficult when in the vicinity of the main access trail or around the heavier used lakes. The drainage is narrow, finding complete solitude is difficult. The drainage is very popular for Boy Scout groups.

No rules or regulations specific to this drainage, in addition to those already established for this wilderness, have been developed.

HIGH UINTAS WILDERNESS EXISTING CONDITIONS (1994)
South Slope

	DUCHESNE RIVER	ROCK CREEK	LAKE FORK	YELLOWSTONE & SWIFT CREEKS	UINTA CANYON
hectares (acres)	9200 (23,000)	24,828 (62,069)	25,232 (63,081)	28,981 (72,452)	29,484 (73,710)
counts	Summit Duchesne	Duchesne	Duchesne	Duchesne	Duchesne
type visitor	urban	urban some rural	rural some urban	rural	rural
visitor days (approx)	7,000	14,000	13,000	13,000	14,000
visitor attractions	easy access, lakes	easy access, lakes	50 mile hike, lakes	Kings Peak, lakes	Kings Peak, lakes
high use areas	Naturalist Basin	Grandaddy Basin, 4 Lakes Basin	Brown Duck Basin	Garfield Basin, Swift Creek	Chain Lakes, Atwood Basin
# waters (lakes, ponds, etc) - 1 surface acre	937				
*s waters w fish	19*s				
# major trails	2	5	3	5	4
type outfitting	none	stock non-stock	stock non-stock	stock non-stock	stock non-stock
# outfitted s-days (approx)	none	stock- 150 non-stock- 50	stock- 200 non-stock- 450	stock- 100 non-stock- 550	stock- 100 non-stock-300
additional rules and regs	yes	no	no	no	yes
type allotment	rec stock	sheep cows rec stock	sheep cows rec stock	sheep cows rec stock	recreation stock
# AUMs (approx)	rec stock	cows 58 rec stock 164	sheep 1362 cows 264 rec stock 164	sheep (rest) cows 259 rec stock 164	sheep 570 rec stock 164
# dams, snotel sites	none	none	4 dams 1 snotel	8 dams 1 snotel	5 dams
# RNAs	none	none	none	none	1

HIGH UINTAS WILDERNESS EXISTING CONDITIONS (1994)
North Slope

	BURNT FORK	BEAVER CREEK	HENRYS FORK	SMITHS FORK	E/M/W FORK BLACKS FORK	STILLWATER & EAST FORK BEAR
Hectares (acres)	9234 (23,084)	12,342 (30,855)	5995 (14,987)	11,154 (27,884)	15,555 (38,888)	10,945 (27,362)
county	Summit, UT	Summit, UT	Summit, UT	Summit, UT	Summit, UT	Summit, UT
type visitor	rural	rural	urban	urban	rural	urban rural
visitor days(aprx)	6,000	3,100	15,500	16,000	4,700	8,000
visitor attraction	lakes, hunting	easy access, lakes	easiest access Kings Pk	Kings Peak, lakes	lakes	lakes
high use areas	Island, Kabell Lakes, hunting camps	Gilbert, Beaver, Coffin Lakes	Bear, Sawmill, Grass, Island, Henrys Fork, & Dollar Lk	Lower and East Red Castle Lakes, Hessie Lake	west bench of East Little Fork, Dead Horse Lake	Alsop, Nonce Lakes, Amethyst Basin
# waters (lakes, ponds, etc) - 1 surface acre	416					
*s waters w fish	23*s					
# major trails	4	6	3	3	5	6
type outfitting	stock	stock	non-stock	non-stock	stock	none
# outfitted s- days (approx)	stock -100	stock-100	n-s-100	n-s-100	stock -100	stock-0
further rules regs	no	no	no	no	no	no
type allotment	sheep cows rec stock	cows rec stock	sheep rec stock	sheep cows rec stock	sheep rec stock	sheep cows rec stock
# AUMs (approx)	s-vacant c-120 rec-46	s-854 c- 228 rec-44	s-854 c- 65 rec-50	s-858 c-1150 rec-171	s-1662 rec-32	s-321 c-90 rec-56

	BURNT FORK	BEAVER CREEK	HENRYS FORK	SMITHS FORK	E/M/W FORK BLACKS FORK	STILLWATER & EAST FORK BEAR
# dams, snotel	1 dam	none	precip gauge aerial marker	none	none	none
# RNAs	none	none	none	none	none	none

chapter four

ENVIRONMENTAL CONSEQUENCES

Chapter IV

INTRODUCTION

The National Environmental Policy Act of 1969 mandates that environmental impact statements disclose the environmental consequences of a proposed action and the alternatives to that action. A variety of environmental consequences will result from implementation of any of the five alternatives. Some effects will be common to all alternatives.

Direct effects are those that occur immediately in the area where the proposal is implemented, while indirect effects are those that occur later in time or are spatially removed from the area where the proposal is implemented (40 CAR 1508.8). Cumulative effects are the incremental impacts of the action and past, present and reasonably foreseeable future actions (40 CAR 1508.7).

The analysis of consequences for the alternatives is driven by the relevant indicators developed for each issue. The decisions to be made are programmatic, that is they are general in nature and are not sufficient to implement project level decisions without appropriate further analysis.

Forest Plan direction was not developed using the Limits of Acceptable Change process, therefore, no classes are described or mapped in current Plans. However, for analysis purposes in this chapter, managers have estimated approximate class acreage for Alternative 5, the No Action alternative which portrays current Plan direction. All alternatives will be compared to this baseline.

EFFECTS AS DEFINED BY ISSUES

Issue 1. Human overuse threatens the integrity of ecosystem components such as riparian areas, wetlands, lakes, streams, topsoil, and wildlife, and threatens potential for re-introduction of extirpated species.

1a) A qualitative description of habitat available to re-introduce extirpated species and the barriers presented by human use.

Effects common to all alternatives. A qualitative description of habitat available to re-introduce extirpated species will depend on the species being considered for re-introduction. Species management is the responsibility of the State and any habitat evaluations would be done in response to a request from them.

At the time the Forest Service receives a proposal from the State for a re-introduction, the description of available habitat will be part of the level of environmental documentation jointly agreed upon by the

State and the Forest Service The agreed upon document would also contain analysis of the social aspects of the proposal which covers the "barriers presented by human use."

Habitat available to re-introduce extirpated species is not lacking and in most cases is dependant on human presence factors such as domestic livestock grazing, fish stocking and the species of fish being stocked In the case of larger mammals, their predatory nature or the possibility of contracting disease from domestic stock would need to be considered in the analysis The re-introduction of native cutthroat trout would require the removal of brook trout in some streams and lakes The re-introduction of amphibians into some areas would require the removal of fish

Effects common to all action alternatives. Barriers to wildlife and the possibility of re-introductions of extirpated species depends on human presence and management practices that have been in place for many years Habitat capability in Class III areas is reduced due to increased human presence The highest amount of Class III area is 25% (Alternative 2), which only leaves small areas scattered throughout the whole where habitat capability is decreased

1b) Qualitative description of the extent to which soil productivity, as measured by topsoil conservation, is affected by all human uses in high elevation alpine areas

Effects common to all action alternatives. The degradation of ecosystem components can be a serious threat to basic processes that control and govern the functions of these ecosystems In extreme cases, where one or several components are outside of the historical range of variation, processes can be disrupted to the point that functions are no longer sustainable The process of nutrient cycling controls to a large extent the function of soil resources in providing the basic site productivity that will sustain native plant communities In turn, these communities function to provide a source of effective cover that protects and sustains site productivity, keeping it in balance with the extreme erosive processes common to these cold, wet, and windswept ecosystems

Ground cover is the management indicator of choice because of its ability to provide an early warning of undesirable conditions that are precursors of resource degradation In most cases, reduction of ground cover will precede the displacement of topsoil by wind and excessive sheet or channelized overland flow

In the cold climates common to the High Andes Wilderness, where the weathering of hard, mineral-poor quartzite rock into nutrients and soil is relatively slow, the topsoil represents a significant portion of the total site productivity Any loss of this topsoil as a result of unnatural accelerated erosive processes would represent a condition outside of the historical range of variation, and a serious disruption to ecosystem processes and functions It follows that where ground covers are maintained at or near to potential, topsoil and associated site productivity will be held at quite stable levels that are sufficient to sustain native plant communities

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Unnatural acceleration of erosive processes is most likely to occur in areas of concentrated human recreation use, along heavily used human foot trails, and in areas that experience concentrated trailing and bedding of domestic and recreational livestock

Incorporation of ground cover and erosion class standards into all of the action alternatives will minimize, to some extent, the potential for accelerated erosion of topsoil to occur in areas of concentrated human recreational use

However, where smaller, high elevation watersheds are allowed to be moved to less pristine opportunity classes as a result of the action alternatives, the effects will vary according to the overall allocations

Incorporation of Best Management Practices into trail maintenance guidelines for each alternative will minimize, to some extent, the potential for accelerated erosion of topsoil to occur near trails experiencing heavy human foot and recreational livestock traffic (i e , west end of Highland Trail) Where the action alternatives allow for the movement of some areas from essentially trailless opportunity classes to less pristine ones, the effects will vary according to the overall allocations These effects will be displayed, for each alternative, under the measurement indicator "A qualitative description of how surface and subsurface water flow regimes are affected by all human uses in riparian areas," under Issue 4

It will be very difficult to minimize the acceleration of erosive processes along established trails that experience concentrated use by domestic livestock In many cases, the existing condition of these trails is far outside the range of natural variation from the standpoint of topsoil and site productivity Also, the delivery of substantial amounts of sediment into streams, lakes, wetlands and riparian areas is having a significant effect on the functions of these ecosystem components Mitigation of these effects is outside the scope of this analysis and must be addressed during allotment planning

Firewood collection is another human activity that can affect high elevation areas Removal of down wood can reduce nutrient cycling, moisture retention and soil fertility The removal of twigs and sticks (both from the ground and dead branches still attached to the base of a tree) has the effect of removing the most important source of wood for nutrient cycling (Cole et al, 1982) Once baseline data is collected and standards developed, implementation of firewood standards will mitigate negative effects of excessive firewood gathering where scarce to no dead woody debris is available

Firewood collection has four basic effects on an ecosystem esthetic (fire ring proliferation), trampling/soil compaction, removal of down wood (nutrient cycling, moisture retention, and soil fertility), and visual quality

The effects of fire ring proliferation and trampling/soil compaction will be monitored through the implementation of campsite density and bare ground/soil erosion standards (See Chapter II)

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The effects of the removal of down wood for firewood are not likely to significantly affect an ecosystem's nutrient capital

The tree components that contribute to soil organic material and are most important to long-term nutrient cycling are the leaves, needles, and small twigs Large downed wood, however, is also very important to nutrient cycling Large woody debris holds more water than soil or humus, retards soil movement, and accumulates nitrogen and phosphorous Such debris supports mycorrhizae and nitrogen-fixing bacteria and contributes to long-term site productivity, particularly in dry or infertile soils (Cole, 1982) Macrofauna (particularly arthropods), birds, and small mammals rely on large woody debris for cover, forage, and nesting, and are also affected by its removal The removal of downed wood that is neither very small nor very large only slightly affects ecosystem viability (Cite USDA Forest Service, 1993 WCNF, Straley, Kenneth Internal summary of campfire effects (of which you have a copy)

The most pronounced effect of firewood gathering is on the visual quality resource Trees that are cut down, girdled, hacked up, carved on, and stripped of their lower branches show substantial evidence of "man's imprint" rather than having been affected "primarily by the forces of nature"

The intent of the proposed standard is to use the visual appearance of an activity area as an indicator of unacceptable negative effects on the visual/tree resource By comparing areas that in the professional judgement of Forest Service resource professionals appear visually to have "abundant," "acceptable, and "scarce to none" campfire wood available for campfires with a commonly accepted methodology for quantifying the abundance of down, woody debris (Brown, James K 1974) will provide a quantifiable standard for local area firewood collection restrictions The goal is to restrict fires only in the geographic areas where the collection of firewood is having an unacceptable adverse effect on the visual/tree resource

The IS proposes a firewood standard which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience Utilizing a quantifiable method, campfires would be restricted and only stoves allowed when monitoring indicated a unacceptable adverse effect on visual/tree resources

Effects of humans overuse on wildlife populations analyzed in Issue 7

Alternative 1. Incorporation of ground cover and erosion class standards into this alternative will minimize the potential for accelerated erosion of topsoil to occur in areas of concentrated human recreational use (about 9% of the High Andes Wilderness) More stringent standards in about 23% of the area, will provide additional vegetation and topsoil conservation Erosion and soil loss effects may be mitigated, although extraordinary restrictions and restoration efforts will be necessary

Alternative 2. The overall distribution of classes within this alternative shows an increase in the acreage of less pristine areas, when compared to Alternative 5 While resource degradation would not necessarily follow the redesignation of more pristine areas to less pristine opportunity classes, the potential for formation of areas with widespread accelerated erosion of topsoil is the greatest among all the action alternatives These effects may be mitigated, although extraordinary restrictions and restoration efforts will probably be necessary

Alternative 3. The overall distribution of classes within this alternative shows an increase in the acreage of pristine areas, when compared to Alternative 5 Incorporation of ground cover and erosion class standards into this alternative will minimize the potential for accelerated erosion of topsoil to occur in areas of concentrated human recreational use

Alternative 4. Although not as great as in Alternative 2, the overall distribution of classes within this alternative shows an increase in the acreage of less pristine areas, when compared to Alternative 5 While resource degradation would not necessarily follow the redesignation of more pristine areas to less pristine opportunity classes, the potential for the formation of areas with widespread accelerated erosion of topsoil is the next greatest among all the action alternatives, following Alternative 2 These effects may be mitigated, although extraordinary restrictions and restoration efforts will probably be necessary

Alternative 5 (No Action). For the No Action Alternative acreage estimates of the three classes approximate those for Alternative 1 Under existing conditions, concentrated human recreation use is known to occur in some of the watersheds within the High Andes Wilderness The potential for this use to have significant effects upon the integrity of ecosystem components is greatest in those high elevation watersheds that are comparatively small For the purposes of this analysis, concentrated use areas in small, high elevation watersheds are

Naturalist Basin
Four Lakes Basin
Garfield Basin
Brown Duck Basin
Chain of Lakes Basin
Atwood Basin
Amethest Basin
Red Castle Basin

Approximately 2000 acres in those basins located on the western end of the wilderness do not meet standards as defined by the 1964 and 1984 Wilderness Acts In addition, recent campsite and trail condition monitoring indicates resource conditions that could pose a significant threat to ecosystem functions These resource conditions include accelerated erosion of topsoil in areas of concentrated human use, such as trails and campsites, delivery of sediment into lakes and streams, and denudation of vegetation from areas of concentrated recreational livestock and human use, such as campsites and bedding/pasture grounds

Because ground cover standards and erosion class standards are not incorporated into the current Forest Plan direction, these resource conditions can be expected to persist where they currently exist and to expand to other heavily used high elevation lake basins

Issue 2. Extent visitor solitude and primitive recreation experiences are affected by other recreationists, resource damage and rules and regulations.

2a) A quantitative comparison of the acreage available by Class for each alternative, and how three types of users may be affected

Effects common to all alternatives. Individuals concerned with the overall condition and preservation of the High Andes or Congressionally designated Wilderness in general, but who are not direct users of the High Andes, ought to feel no difference in the effects of any of the proposed alternatives. Wilderness values will be protected within the general parameters of the Wilderness Act regardless of which alternative is selected

Using the definitions of Group One (hunters, fisherman, horsemen, and stock assisted users), Group Two (hikers and those who prefer pristine conditions and small group experiences), and Group Three (organizational groups who recreate in larger groups) users from Chapter III, the following assumptions have been made for this analysis

Group One. Users probably prefer a maximum acreage of Class II areas, Class I is a second preference, and Class III areas are least preferable

Group Two. Users probably prefer a maximum acreage of Class I areas, Class II is a second preference, and Class III areas are least preferable

Group Three. Users probably prefer a maximum acreage of Class III areas, Class I is a second preference, and Class II areas are least preferable

Given the definitions of user types and assumptions on their preferences, the following statements summarize the effects of the selection of any alternative on user types

Alternative 1. Alternative 1 should be the second choice alternative for all three user groups, as it provides them with a considerable amount of acreage to meet assumed solitude and recreational needs. It does not maximize optimal use conditions for any of the three user groups

Alternative 2. This alternative is the first choice for Group Three users, as it maximizes the acreage in Class III. Group Two users will believe that designating this much acreage Class III will allocate too much of the wilderness to an overly crowded condition, and may choose to recreate in different wildernesses or only at very selected locations/times in the High Andes

Alternative 3. This alternative is the first choice for Group Two users, as it maximizes the acreage in Class I. Group Three users may feel administratively pinched and that their traditional use patterns are threatened. They may feel like going elsewhere (wilderness or non-wilderness) to pursue their activities. Few Group One users may support this alternative, particularly those who have interests in domestic or recreational livestock use

Alternative 4. This alternative is the first choice for Group One users, as it maximizes the acreage in Class II. Most Group Two users will feel that degraded wilderness values are present over too large an area of the High Andes. Most Group Three users can live with Alternative 4, and will prefer it to Alternative 3, as it allows for more and denser use, which is not an adverse effect on their wilderness experience

Alternative 5 (No Action). Acreage estimates of the three classes in this alternative approximate Alternative 1. But because there are no desired condition classes nor measurable standards defined in current Forest Plans, it is not as well suited to providing acreage that meets user group preferences as either Alternative 1 or the first choice alternative for any user group. It is suggested that if the wilderness is zoned into classes as under Alternative 1 through 4, user groups may be directed to areas where they have the best chance of attaining the experience they seek. Alternative 5 may be the weakest at meeting any user group's preferred experience, and as such is probably the highest potential for adverse effects on any of the three described groups

2b) A qualitative discussion of the effects of other users on the solitude and primitive recreation experience of three types of users, for each alternative

Assumptions

Group One. Members of this group are moderately concerned with having a high degree of solitude in their wilderness experience

Group Two. Members of this group are highly concerned with having a high degree of solitude in their wilderness experience

Group Three. Members of this group are less concerned than members of either Group One or Two about having a high degree of solitude in their wilderness experience

Alternative 1. This alternative provides a mix of all kinds of solitude experiences to all user groups most similar to current conditions while correcting unacceptable conditions in some drainages. This alternative results in minimal effects to Group One and Two users by providing the second greatest amount allocated to each Class I and Class II areas. Being less concerned about the presence of others, Group Three users are not adversely affected by this alternative

Alternative 2. Alternative 2 is most likely unacceptable in providing the degree of solitude for Group Two users and would negatively affect them. This alternative would be marginally acceptable to Group One users and they may be somewhat negatively affected by the large amount of Class III allocation where outstanding opportunities for solitude are limited. Group Three users will find this alternative attractive, as it maximizes the area that provides the experience most preferred by this group. Because wilderness experiences of Group Three are mid-size to larger groups they will not be adversely affected by encountering other large private or outfitted groups

Alternative 3. This alternative will provide Group Two users the greatest opportunity

for solitude among the alternatives, making it popular with them. Because of the acreage of Class I which recommends smaller group size and discourages outfitter use, Group Two users will not likely encounter the larger groups and outfitter use that detract from their wilderness experience. This alternative limits areas preferred by Group One and Three users more than they think is necessary to meet their values for solitude. While this alternative provides very limited amounts of the type of class most preferred by Group Three, their primitive recreation experience is not adversely affected by the presence of others.

Alternative 4. Alternative 4 should be favored by Group One users as it again has the highest acreage available for the kind of solitude this group espouses. Group One's visits to the wilderness range from single individuals to larger group participation, including the frequent use of horses. Viewing others in large groups or outfitted generally does not interfere with their enjoyment of the setting or detract from their feeling of solitude. Group Two experience would be adversely affected as the likelihood of encountering outfitted recreation use is moderate in Class II areas. While this alternative provides limited amounts of the type of class most preferred by Group Three, their primitive recreation experience is not adversely affected by the presence of others.

Alternative 5 (No Action). Because this alternative does not provide for classes nor standards attached to classes, the No Action alternative will probably not meet Group One and Two users expectations with respect to solitude and would negatively affect their primitive recreation experience. Group One and Two would not have the option of choosing an area knowing it was being managed for rare encounters. While Group Three users may be satisfied with the solitude provided in the short-term and not adversely affected by the presence of others, in the long-term, as populations increase and more people visit the HUW, they too may become less satisfied.

2c) Effects of management actions directly in the High Andes Wilderness, including signing, trail work, wilderness ranger camps, ranger presence on the three types of users.

Assumptions

Group One. Members of this group are relatively unconcerned with having Forest Service presence in the wilderness.

Group Two. Members of this group are highly concerned with having agency presence in wilderness, preferring a pristine natural setting.

Group Three. Members of this group moderately concerned about having agency presence in the wilderness, thinking that at times the presence is desirable and at others it is not.

Effects common to all alternatives. With respect to agency on-site presence, it is not believed that Group One users would be differentially affected by a choice for any of the alternatives.

Alternative 1. Management actions inside the wilderness will be prevalent in Class III and less evident in Class II areas. The presence of such would somewhat negatively

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affect the wilderness experience for Group Two users, but to a limited degree since this alternative provides the second greatest amount of Class I where agency on-site presence is rare. It may result in those users changing access points or destinations within the Wilderness. Because Group Three users feel both positive and negative about agency presence, they would be somewhat to moderately affected by this alternative because it provides the second greatest amount of acreage in Class III.

Alternative 2. Those Group Three users that find agency presence desirable would most prefer Alternative 2. They would be positively affected by the large amounts of Class III and II settings. Signing and trail work would most likely enhance their experience. Group Two users would view the presence of management actions on nearly a quarter of the wilderness as negatively affecting the wilderness setting and their experience.

Alternative 3. For those Group Three users that find agency presence desirable, the amount of Class III may negatively affect them because of the limited area that is influenced by management actions. Group Two users would be positively affected by Alternative 3 because ranger presence would be rare in 40% of the HUW. The lack of signing and trail work would likely enhance their experience.

Alternative 4. Group Three users may be somewhat negatively affected by the availability of the small amount of wilderness settings they most prefer. They may feel less comfortable venturing into areas that require more primitive recreation skill than they possess. Group Two users will be equally affected as they encounter more management presence than they desire.

Alternative 5 (No Action). Because this alternative does not provide for classes nor standards attached to classes, the No Action alternative will probably not meet Group Two's expectations with respect to their desire for little agency presence and management. Group Two users would not have the option of choosing an area knowing how it was being managed for agency presence though from past experience they may know where they will find the setting most likely to meet their needs. Group Three users will find themselves in a similar situation having to rely on past experience in knowing an appropriate area.

2d) Effects of management actions outside the High Andes Wilderness, including education programs, trailhead information, specials orders for camping, fires, group size.

The following Special Orders are currently in place.

All Areas
No mechanized or motorized equipment
No noxious weed seed brought in
No use of firearms within 150 yards of campsite, body of water, etc.
No use of salt to attract wildlife
Group size not to exceed 14 people and or 15 stock
Camping in inappropriate areas
Shortcutting a trail switchback
Littering
Inappropriate containment of stock

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Certain Areas:

Overnight use of horses in Chain Lakes
Campfires in Naturalist Basin

Assumptions

All three user groups appreciate and expect increased agency effort to communicate information and education outside the High Andes Wilderness, therefore less control (enforcement, signing, etc) is needed within the Wilderness Users will tend to learn what is expected and will in good faith stay within the parameters set by the Forest Service

Group One. Members of this group are very concerned about having management actions constrain their on-the-ground activities

Group Two. Members of this group generally welcome outside wilderness management actions that guarantee certain on-the-ground resource conditions

Group Three. Members of this group appreciate education programs and information, but will be somewhat concerned with restrictions on fires, camping, and group size

Alternative 1. Group One users would see little change from current conditions if this alternative were implemented, which would suit them quite well Group Two users might be satisfied with alternative, but it would be their second choice Group Three users might also be satisfied with Alternative 1

Alternative 2. Group One users may favor this alternative as it requires less outside wilderness agency management compared to some others These alternatives would probably be unacceptable for Group Two users, as it defines a desired future condition for too much of the High Andes that is below a standard they consider appropriate for a wilderness experience Mixed reviews from Group Three users who want outside wilderness education programs (which might be minimal with this alternative), while liking the high acreage figure for Class III associated with the alternative

Alternative 3. For Group One and Three users agency management actions to implement this alternative might be seen as constraints on their activities This alternative should provide Group Two the optimum agency management scenario many agency education efforts would be directed at steering use outside Congressionally designated Wilderness to other non-wilderness backcountry settings

Alternative 4. This alternative might be favored by Group One as outside Wilderness agency efforts would be not as intensive as with Alternatives 1 or 3 This alternative is not as desirable as Alternative 1 or 3 for Group Two, but it is better than either Alternative 2 or 5 Group Three may not like this alternative, as it provides minimum agency education efforts, compared to the other action alternatives

Alternative 5 (No Action). The No Action alternative would continue to see the Forest Service provide some education programs, trailhead information, and regulation in areas where problems were perceived by individual managers or rangers However, fewer wilderness-wide standards are set that can be communicated to users Suggestions from

the Forest Service to users on how one might best meet individual objectives for recreation or solitude experience levels are more difficult to make

Issue 3. Extent outfitting and guiding (O/G) operations are affected by use limits and desired condition (Class) designations.

3a) Acres available with the most opportunity for outfitted use

Desired conditions for each Class determine appropriate areas available for use by outfitters As defined, Class II zones are the most appropriate areas for outfitted activities By definition they are not heavily used by the public nor are they within the most pristine areas

For comparison to the other alternatives, the ID team estimated the percentage of the wilderness with characteristics similar to those described in Class II condition These estimates will be used for comparative purposes against the other alternatives to approximate potential changes from the current condition

Alternative 1. In Alternative 1, 68% of the wilderness (310,040 acres) is classified as most appropriate for O/G use

Alternative 2. In Alternative 2, 61% of the wilderness (280,600 acres) is classified as most appropriate for O/G use

Alternative 3. In Alternative 3, 58% of the wilderness (266,800 acres) is classified as most appropriate for O/G use

Alternative 4. In Alternative 4, 78% of the wilderness (358,800 acres) is classified as most appropriate for O/G use

Alternative 5 (No Action). As presently directed by the Wasatch-Cache and Ashley Forest Plans, the areas having the highest opportunity for outfitted use, within wilderness standards, is undefined However, the plans direct managers to manage for the Recreation Opportunity Spectrum (ROS) category of Primitive (unmodified natural environment, extremely high probability of experiencing solitude, evidence of humans generally unnoticeable, nonmotorized) and regulate use to disperse wilderness visitors and protect the wilderness resource

As a result, the areas in the HUW with the highest opportunity for outfitted use are defined by user patterns Places that are more easily accessible, contain lakes or other attractions and/or are within a few miles of a trailhead, and places that receive little use, are relatively pristine, and are more fragile are not appropriate for outfitted use

Alternative 5 is estimated to have approximately 68% of the wilderness with characteristics similar to those described in Class II condition

3b) Relative level of use authorized for outfitters and guides per drainage

Effects common to all action alternatives. Based on historic use figures and permit numbers, managers have determined the current number and mix of outfitted operations is appropriate and meets the public need However, some opportunity for new permits exists if managers determine

further public need for outfitting services based on the outfitting and guiding needs criteria (See Chapter II)

Therefore, Alternatives 1-4 set the standard for permits for stock-use outfitters at a maximum of seven and for non-stock use outfitters at a maximum of four

This standard currently restricts any new outfitter and guides from establishing wilderness outfitting activities However, when and if further public need is determined, new permits may be offered through a prospectus

If restrictions are deemed necessary to protect wilderness resources, outfitters and guides will be required to adhere to the same restrictions as the public For example, if a certain lake basin is showing signs of resource decline due to recreation activities,
: public and outfitters will be targeted
itional education efforts and/or
ictions on use to reverse the trend

By definition Class II areas are the most appropriate for outfitting operations The table at the end of this chapter compares the number of service days available by drainage

Alternative 1. Total service days available 4400

Alternative 2. Total service days available 4025

Alternative 3. Total service days available 3125

Alternative 4. Total service days available 5000

Alternative 5 (No Action). Alternative 5 maintains current Forest plan direction It allows two hunting outfitters (300 service days each, use period 9/1 to end of fall season) for the north slope and a maximum of five hunting and fishing outfitters on the south slope (no service day limit, use period 7/1 to end of the fall season)

It also allows educational/institutional organizations to outfit with the following restrictions

Ashley limits stay to no more than 14 days, accepts only one application per outfitter before May 1, after May 1, issue permits on a first come/first serve basis, and allows no more than two groups per district at any one time

Wasatch-Cache limits stay to 14 days, accepts only one application per outfitter before May 1, after May 1, issue permits on a first come/first serve basis, allows no more than two groups in the wilderness at any one time, and permits no outfitter/guides in the Duchesne River drainage

The effects of the No Action alternative on the use authorized for outfitter/guides include limited stock-use outfitting to hunting and/or fishing guides in the season they are permitted to operate On the Ashley they are not limited by number of service days they can provide, whereas on the Wasatch-Cache they are limited to 300 days per permit (both inside and outside the wilderness use limit)

Organizational/educational outfitter use is limited to 14 days stay per group, an application process that is unclear and

untimely, and a restriction to no more than two groups in the wilderness or on the district at any one time Service day ceilings are not identified, however outfitter and guide use is discouraged from using highly popular basin and trailheads

3c) Economic effects on outfitter operations

Permitted outfitting and guiding operations are of basically of two types, those with the support of stock and those without These operations are variable in size Most are quite small and have gross revenues of only a few thousand dollars, while a few are more substantial and have gross receipts over $50,000

Effects common to all action alternatives. In each action alternative, the authorized number of service days available are from 4% (Alternative 3) to 63% (Alternative 4) greater than service days actually used in 1994 or 1995 Therefore, each action alternative leaves some room for growth for existing outfitters In order to qualify for service days above the actual use (highest of 1994 or 1995), each outfitter will apply for additional days using the following criteria

For example, if an outfitter actually used 100 service days in 1994 and 150 service days in 1995, their service day authorization for each action alternative is 150 days By meeting the listed criteria, they could expand their service day authorization to accommodate future growth (the amount of expansion available will be determined by the selected alternative)

Alternative 1. Implementation of Alternative 1 would have a minor economic impact on outfitter-guides operating in the High Andes Wilderness Area None of the stock-type operations would be affected

Non-stock type outfitter-guides operating in the Yellowstone drainage would be required to reduce the total number of service days provided in this drainage by about 10% from 1995 levels However, this potential effect could likely be eliminated Currently, three permittees operate within the Yellowstone drainage Two of these permittees also provide services in the Lake Fork and Uinta drainages By redistributing some service days to the Uinta or Lake Fork drainages, a reduction in total service days and gross revenues could be avoided This could possibly affect profitability if additional costs were associated with redistributing use or if total use declined

If the redistribution of 10% of the service days in the Yellowstone drainage were not possible, it would result in a $500-$3000 loss to non-stock operators Since most Yellowstone clientele come from outside the local area, it is likely there would be little if any loss of business This assumes that most non-local clients are generally unfamiliar with the area and not strongly attached to the Yellowstone drainage Therefore, these clients would not be disappointed by partial inability to use the Yellowstone drainage (i e one drainage may be as good as another to those not familiar with the Andes)

It is impossible to estimate the exact extra cost to the outfitter of partial relocation redistribution at this time, however, it is expected to be minimal Furthermore, given the size and nature of the affected outfitting operation, it is highly

unlikely that any slight increase in cost and price to clients would have any measurable affect on an operation's viability. Therefore, we predict no short-term effects on the economic viability of outfitting under Alternative 1.

On the north slope the Henrys Fork and Smiths Fork drainages are made available to non-stock outfitting for a total of 450 service days, offering some opportunity for business expansion and area diversity to the outfitter and clients.

For the long-term the proposed numbers of service days for each drainage will provide limits to growth opportunities, especially in Lake Fork, Uinta, and Yellowstone. There would be some opportunity for growth from current levels in Rock Creek and on the north slope.

Cumulatively, this alternative permits 1,850 service days of stock-type outfitter-guide use and 2,550 service days of non-stock use. In 1994 and 1995, an average of about 582 service days of stock-type use and 1,388 service days of non-stock use were provided by outfitter-guides within the wilderness. Comparing these indicates that this alternative provides significant opportunities for growth. Stock-type use within the High Andes could increase by about 1,268 service days and non-stock use by 1,162 service days.

Alternative 2. Alternative 2 would have substantial economic impacts on some outfitter-guides operating in the High Andes Wilderness. One of the stock-type operations would be affected, as would three of the four non-stock operations.

The stock type outfitter-guide operating in the Yellowstone drainage would be required to reduce service days of use in this drainage by about 33% from 1994 levels (NOTE: 1995 use levels were below the limits set in this alternative, consequently, use would not have to be reduced from 1995 levels). Average use over the 1994 and 1995 seasons is about 20% above use levels permitted in the Yellowstone drainage under this alternative). However, this potential effect could be mitigated. Currently, this outfitter-guide also provides services in the Lake Fork and Uinta drainages. By redistributing some service days to the Uinta or Lake Fork drainages, a reduction in total service days and gross revenues could be avoided. This could possibly affect profitability if additional costs were associated with redistributing use or if total use declined.

Non-stock outfitting service days in the Yellowstone drainage would be reduced under Alternative 2 by about 43-50% compared to 1994 and 1995 activity. Similarly, a 21% reduction from 1995 use levels for non-stock outfitting would be required in the Uinta drainage. (NOTE: 1994 use levels were only 77% of levels permitted under this alternate, average 1994-1995 use would have to be reduced about 2% under this alternative). It may be possible to redistribute some of this use to the Lake Fork, Rock Creek, Duchesne or north slope drainages or outside of the wilderness, however, logistical and other considerations will likely limit the amount of redistribution that is practical.

One of the affected operators is an educational institution, one is an

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environmental organization, and the other is a large recreation business. Most of the potentially affected clients reside outside of the Rocky Mountain area. As explained in the effects for Alternative 1, these clients would be likely to seek services from these operators if reasonably comparable opportunities were provided elsewhere within the Andes Range. For the educational and environmental organizations affected, revenue generation from High Andes operations are probably highly important only from the standpoint that they cover operating costs.

Consequently, the decreased in use described for the two drainages would decrease gross receipts for these two organizations combined by about $9,000 from 1995 levels (assuming no redistribution occurred). This would not be extremely damaging (i.e. these are non-profit groups), though the corresponding loss in educational/recreational opportunity would be (providing replacement opportunities were not found elsewhere), both to the affected organizations and to the goal of providing these values from wilderness areas.

The large human development/recreation business is sufficiently large that the impacts would not jeopardize the economic viability of the business. Despite this, the business affected would probably consider a $14,000 decline in gross revenues (from 1995 levels) from the High Andes portion of their operation a very serious matter.

Under Alternative 2 on the north slope, the Henrys Fork and Smiths Fork drainages are made available to non-stock outfitting for a total of 450 service days, offering some opportunity for business expansion and areal diversity to the outfitter and clients.

Cumulatively, this alternative permits 1,475 service days of stock-type outfitter-guide use and 2,550 service days of non-stock use. Comparing these service days with 1994 and 1995 use levels (see Alternative 1 discussion), the indication is that cumulatively, this alternative provides significant opportunities for growth. Stock-type use within the High Andes could increase by about 893 service days and non-stock use by 1,162 service days.

Alternative 3. Alternative 3 would economically impact more of the outfitter-guides operating in the High Andes Wilderness than the other alternatives. All non-stock and five of six stock operations would be affected by this alternative.

In Rock Creek drainage, 1995 non-stock type outfitted use was below the levels established in Alternative 3. However, 1994 use was 23% above the established limit. This indicates the outfitter-guides operating in Rock Creek would likely be affected in the near future by implementation of this alternative. This particular operation is part of a fairly large recreation services business, and is sufficiently large that any economic impacts associated with Alternative 3 would not jeopardize the economic viability of the business. Despite this, the operators would consider any short-term impacts and limitations on future growth in their High Andes business a very serious matter.

In the Uinta, Lake Fork and Yellowstone drainages, reductions in non-stock use would be required under this alternative.

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Reductions for non-stock outfitters are about 61% in the Uinta drainage and 8% in the Yellowstone drainage (based on 1995 use levels) This would affect three outfitter/guide operators One of the affected operators is an educational institution, one is an environmental organization and the other is a large recreation/human development business Most of the clients potentially affected reside outside of the Rocky Mountain area As explained in the effects for Alternative 1, these clients would be likely to stay if reasonably comparable opportunities were provided elsewhere within the Andes For the educational and environmental organizations affected, revenue generation from High Andes operations are probably highly important only from the standpoint that they cover operating costs

Consequently, the decreases in use described for the three drainages would decrease gross receipts for these two organizations combined by about $2,000 from 1995 levels (assuming no redistribution occurred) This would not be extremely damaging (i e these are non-profit groups), though the corresponding loss in educational/recreational opportunity would be (providing replacement opportunities were not found elsewhere), both to the affected organizations and to the goal of providing these values from wilderness areas

The large human development/recreation business is sufficiently large that the impacts would not jeopardize the economic viability of the business Despite this, the business affected would probably consider a $6,300 decline in gross revenues (from 1995 levels) from the High Andes portion of their operation a very serious matter

On the north slope, the Henrys Fork and Smiths Fork drainages are made available to non-stock outfitting for a total of 450 service days, offering some opportunity for business expansion and areal diversity to the outfitter and clients

The stock type outfitter-guide servicing the Blacks Fork and Smiths Fork drainages would not be affected This alternative would however, necessitate a 50% reduction in outfitted use in the Beaver Creek and Burnt Fork drainages This would result in a decrease of roughly $2000 in gross revenues which would gravely affect the viability of this small business

In the Uinta drainage, a 53% reduction in use from 1995 levels would be required In 1995, only one outfitter provided services in this drainage This outfitter did not operate in other drainages within the wilderness Many of this outfitter's clients reside within the state and some may have strong attachments to the Uinta drainage These individuals may be unwilling to go to another drainage Consequently, a reduction in total use may occur Although some redistribution of use may be possible, complete mitigation for the reductions in this drainage are unlikely given logistical and other considerations

This alternative would result in a decline of about $6,300 in gross revenues from 1995 This would be probably be considered a serious impact gravely affecting the viability of this small business In 1994, another

operator also serviced the Uinta drainage (in 1995 this outfitter operated in just the Yellowstone and Lake Fork drainages) Under this alternative, the limited amount of use available would preclude this operator's ability to return to the Uinta drainage

In the Rock Creek drainage, a 61% reduction in use would occur This would affect two small operators Currently, neither of these businesses operate in other drainages within the High Andes Wilderness One of these businesses also serves primarily local clients who may have strong attachments to Rock Creek and therefore be unwilling to go to other areas Consequently, redistribution of some of their use is less likely and possibly more costly than other situations where businesses have already established operations in other drainages

A 61% reduction in use would generate approximately $5,200 less in gross revenues for the two businesses For one business affected, this may result in their dropping outfitting and guiding operations but would probably not destroy their overall business's viability (i e outfitting and guiding is a small part of a larger array of business operations) For the other business, this may affect the viability of their small business

Clearly, some of the impacts described above are heavy reductions which will probably force both stock and non-stock permittees to rethink how and where they can do business Major redistribution of both kinds of outfitting ought to be needed into other nearby areas where limits have not been exceeded to satisfy current levels of service Because total service days available for non-stock and stock across the High Andes still significantly exceed 1994/95 use levels, it may be that viable operations are still possible, but they would not use the same areas that have traditionally been used, and outfitters would have to spread their operations more thinly over broader areas to accommodate permit requirements

In this situation, outfitters and guides may well run up against costs per client that are too high to support operations, or prices will be raised to a point that very few are willing to pay for the experience At this point it is difficult to itemize how much increased cost may be added

Alternative 3 does allow for both stock and non-stock outfitted services in Henrys Fork and Smiths Fork where this is not possible now Under Alternative 3, 225 service days of stock outfitting and 225 service days of non-stock are available, allowing the outfitter and client possibilities for expansion of business interest and recreational opportunity respectively

This alternative is the most restrictive in total service days available of all action alternatives, and will cause the greatest impacts to outfitters and guides Cumulatively, this alternative permits 1,300 service days of stock-type outfitter-guide use and 1,825 service days of non-stock use Comparing these with 1994 and 1995 use levels (see Alternative 1 discussion), cumulatively this alternative provides some opportunities for growth Stock-type use within the High Andes could increase by 718 service days and non-stock use by 437 service days

Alternative 4. Alternative 4 requires no reductions of outfitting and guiding operations for any drainage in the High Andes Wilderness, and offers these operators and their clients substantial opportunities for future growth. Clearly, this is the most attractive setting outfitters and guides, for both stock and non-stock operations.

In the short-term operations will probably continue much as they have been in the past with a long-term possibility for increasing use several hundred service days available beyond existing use.

Alternative 4 also allows for both stock and non-stock outfitted services in Henrys Fork and Smiths Fork where this is not permitted now. In these drainages stock outfitting for 125 service days would be available and 200 service days for non-stock would be available.

Cumulatively, this alternative permits 2,050 service days of stock-type outfitter-guide use and 2,950 service days of non-stock use. Comparing these with 1994 and 1995 use levels (see Alternative 1 discussion), cumulatively this alternative provides substantial opportunities for growth. Stock-type use within the High Andes could increase by about 1591 service days and non-stock use by 1397 service days.

Alternative 5 (No Action). Under this, the No Action Alternative, existing outfitter-guide direction would remain in effect. As a result, no change from the existing situation is anticipated in the short-term. Existing use and economic consequences of this use are described in the Economics section of the Affected Environment Chapter of this IS.

The existing Forest Plans and this alternative provide for no outfitter-guide use in the Duchesne drainage and no stock-type outfitted use in Henrys Fork and Smiths Fork drainages. This alternative also limits stock-type outfitted use to 300 service days in Burnt Fork/Beaver Creek and 300 service days in Blacks Fork/Stillwater Fork/East Fork Bear River drainages. Other than just described, authorized use levels are based upon administrative determinations.

At present, there are 2,500 service days of stock type and 2,420 service days of non-stock type outfitted use authorized within the wilderness (NOTE: actual use is much lower with 1995 stock type use of 1,223 service days and non-stock type outfitted use of 1,553 days). Except as described in the preceding paragraph, these limits reflect the historical maximum amount of authorized use or requested amount of authorized use as much as they reflect an established or calculated capacity.

In the long-term, outfitted stock type use in Burnt Fork/Beaver Creek could nearly double (increase by about 145 service days over 1995 use levels). In Blacks Fork/Stillwater Fork/East Fork Bear River, drainages outfitted stock type use could increase more than five times (increase by about 250 service days over 1995 levels). An undetermined amount of outfitted stock and non-stock type use growth could occur in Rock Creek, Lake Fork, Yellowstone, and Uinta drainages. Similarly, an undetermined amount of outfitted non-stock type use

growth could occur in Henrys Fork, Smiths Fork, Blacks Fork, East Fork Bear River/Stillwater Fork, Beaver Creek and Burnt Fork drainages.

Issue 4. The extent system trails (including signs and bridges) meet wilderness objectives including soil and water quality, and other indicators of pristine character. In some areas trails are inappropriate, they duplicate destinations, are poorly placed and/or are insufficiently maintained.

Effects common to all alternatives. Historically, most trails in the wilderness served cattle and sheep grazing activities. Because these trails were never engineered, many pass through wet areas, duplicate destinations or traverse passes that do not support a safe passage for users. Some designated system trails are redundant and access similar destinations. Areas containing such trail density for user convenience will be evaluated in light of the zones in proximity and the visitor/management need for the trail.

Soil, water and wildlife habitat quality are adversely affected to relatively minor degrees when a trail (and its users) pass through a sensitive area. Use and maintenance of trails causes disturbance and displacement of surface soil and organic matter, compaction of trail tread (especially in moist areas), trampling and denuding of vegetation. These impacts occur on designated system trails as well as user-created trails around lakes, streams and campsites.

Increased runoff, erosion and sedimentation will continue in established campsites and trails due to compacted and disturbed ground surfaces. However, if the total compacted and disturbed area does not increase significantly, runoff, erosion and sedimentation rates will not increase from current conditions.

Some areas contain duplicate trails. Those that do not meet resource protection standards and contribute to the range of wilderness recreation opportunities, will be evaluated and closed if necessary.

Although maintenance and reconstruction funding for system trails is minimal, and will not be increasing in the near future, managers attempt to maintain trails annually to the following standards in order to prevent erosion and soil compaction:

Maintenance level 1. Resource protection and safety.

Maintenance level 2. Preservation of investment.

Maintenance level 3. Enhanced preservation of investment.

Currently, 70-80% of the system trails are maintained at level one or two. The remaining higher use trails (20-30 percent) are maintained at level three.

4a) Acres available with no system trails.

Effects common to all action alternatives. Class I is defined as having no system trails. However, where a system trail is located in a Class I area, the trail and a 1/4 mile corridor will be considered Class II. In addition, an

undetermined amount of area within Class II and III will also be without system trails

Alternative 1. Twenty-three percent of the wilderness, or 55,200 acres in Alternative 1 is zoned as Class I

Alternative 2. Fourteen percent of the wilderness, or 64,400 acres in Alternative 2 is zoned as Class I

Alternative 3. Forty percent of the wilderness, or 184,000 acres in Alternative 3 is zoned as Class I

Alternative 4. Seventeen percent of the wilderness, or 78,200 acres in Alternative 4 is zoned as Class I

Alternative 5 (No Action). As presently directed by the Wasatch-Cache and Ashley Forest Plans, the area with no system trails, is undefined However, acres estimated with no system trails is about 23 percent, or 55,200 acres

4b) A qualitative description of how surface and subsurface water flow regimes are affected by all human uses in riparian areas

Effects common to action alternatives. Incorporation of Best Management Practices into trail maintenance guidelines for each alternative will minimize, to some extent, the potential for accelerated erosion of topsoil to occur near trails experiencing heavy human foot and recreational livestock traffic Where the action alternatives allow for the movement of some areas from essentially trailess opportunity classes to less pristine ones, the effects will vary according to the overall allocations

Alternative 1. Aside from the unacceptable conditions associated with the Highline Trail mentioned previously (Issue Criteria 1b), incorporation of Best Management Practices into trail maintenance guidelines for this alternative will minimize the effects along trails experiencing heavy human foot and recreational livestock traffic

Alternative 2. The overall distribution of classes within this alternative shows a decrease in the acreage of essentially trailess areas, when compared to the Alternative 5 Because maintenance and reconstruction funding for system trails is minimal, and will not be increasing in the near future, it is unlikely that the Best Management Practices within the trail maintenance guidelines could be effectively implemented Therefore, this alternative will allow for increases in human uses that would cause adverse effects upon surface and subsurface flow regimes in riparian areas that could not be mitigated Moving the Four Lakes Basin from Class III to Class II will not appreciably minimize this effect

Alternative 3. The overall distribution of classes within this alternative shows an increase in the acreage of essentially trailess areas, when compared to Alternative 5 Aside from the unacceptable conditions associated with the Highline Trail mentioned previously, incorporation of Best Management Practices into trail maintenance guidelines for each alternative will minimize the effects along trails experiencing heavy human foot and recreational livestock traffic

Alternative 4. Although not as great as in Alternative 2, the overall distribution of classes within this alternative shows a

decrease in the acreage of essentially trailess areas, when compared to Alternative 5 Because maintenance and reconstruction funding for system trails is minimal, and will not be increasing in the near future, it is unlikely that the Best Management Practices within the trail maintenance guidelines could be effectively implemented Therefore, this alternative will allow for some increase in human uses that could cause adverse effects upon surface and subsurface flow regimes in riparian areas that cannot be mitigated This effect will be somewhat lessened by the upgrading of Naturalist and Amethyst Basins to wilderness standards

Alternative 5 (No Action). The Ashley and Wasatch-Cache Forest Plans direct managers to use the Forest Service Trails Handbook (FSH 7709 12) for maintenance and construction of trails Because maintenance and reconstruction funding for system trails is minimal, and will not be increasing in the near future, it is unlikely these trail maintenance guidelines could be effectively implemented Therefore, accelerated erosion near trails experiencing heavy human foot and recreational stock traffic can be expected to persist This erosion will also produce sediment that will be delivered into live water where trails cross or where trails are located adjacent to streams and lakes

Issue 5. Human and animal waste threaten water quality.

Effects common to all alternatives. A study on the South Slope of the Uinta mountains by Andy Godfry in the 1970s indicated no difference in coliform bacteria between graze and no graze periods Samples of this study were taken lower in the canyons in larger streams This study indicates little effect on a larger scale Beneficial uses of the High Andes Wilderness lakes and streams (and for which they are protected from controllable pollution such as fecal coliform bacteria) include non-game fish, necessary food chain aquatic organisms, and recreation These water bodies are specifically not protected for the uses of recreational bathing or for potable water The fecal coliform bacteria standard, for the protected uses, is 200 bacteria maximum per 100 milligrams of water

Coliform bacteria from livestock grazing might be expected in local areas of smaller streams Also, coliform bacteria from human uses may occur where camping activities currently exist in close proximity to lakes and streams

Standards that require setback of livestock overnight areas and human camping sites from lakes and streams will minimize the potential of water quality degradation for protected beneficial uses

Issue 6. Exotic (non-native) plant species threaten natural functions of the ecosystem.

Effects common to all alternatives. Aggressive exotic species (including those designated as noxious weeds) have the capacity to replace native species and alter composition of native plant communities In extreme cases, including cheatgrass on the Snake River Plains of Idaho and leafy spurge and spotted knapweed in Montana, these plants alter natural functions of native ecosystems Most of the High Andes

Wilderness is beyond the ecological amplitude of aggressive exotic plants However, a few species listed as noxious weeds in Utah are capable of persisting at lower elevations of this wilderness They were present in some locations of this wilderness prior to its establishment in 1984 including some canyon bottoms of the south slope of the Andes

No alternative presented in this document will have any significant effects on these resources nor will there be any discernable difference among alternatives

Issue 7. The extent to which habitat and populations of native, endangered, threatened, proposed and Forest Service sensitive species of fish and wildlife are protected by wilderness management measures.

Effects common to all action alternatives. Within the High Andes Wilderness, the biggest impact on habitat effectiveness is the amount of human use Effects from human-use on habitats range from the actual presence of humans to the cutting down and hacking of living and dead trees for firewood and areas of intensive use where habitat has been altered

With this in mind, the effects analysis relates specifically to the amount of human use a particular area receives or may receive due to the Desired Condition Class

Class I areas receive the least use, therefore they have the highest habitat effectiveness These areas may not have the highest diversity of flora or fauna because they are typically the more rugged areas above timberline with the harshest conditions

Class II areas fall in the middle range of use They tend toward more diversity in flora and fauna than Class I areas and would probably provide greater habitat effectiveness for a greater number of species than the Class I areas

Class III areas receive the highest human use and may be about the same in the diversity of flora or fauna as the Class II areas, but due to the high use would not have the same habitat effectiveness

Except for Alternative 2 with 25% in Class III, the other action alternatives are close enough in the percentage of Class I and II that a difference in habitat effectiveness would not really be detectable Even with the 25% in Alternative 2, it is hard to show a difference in habitat effectiveness between any of the alternatives

Habitat effectiveness of Federally listed species is covered in the biological assessment (available on request), where the determination has been made there are no effects on the species with the implementation of any of the alternatives The Forest Service designated sensitive species are discussed in the biological evaluation (available on request) The U S Fish and Wildlife Service concurs with Forest Service determination that the viability of identified sensitive species is not threatened under any alternative

Alternative 5 (No Action). As presently directed in the Ashley and Wasatch-Cache Forest Plans, the area with the least

probability of impacting wildlife habitat is undefined In general the plans say that natural process will be allowed to shape wildlife habitat, transplants will be limited to native species and considered only when a vacant niche has been identified, where potential exists for a transplant species to migrate into adjacent management areas, the impacts will be included in the analysis, and reestablish native species classified as sensitive

As a result of this direction, the no action alternative fully protects the habitat and populations of the above species

Issue 8. The extent to which air quality is affected by pollution and management ignited prescribed fire smoke.

Effects common to all alternatives. Currently, the HUW is designated as a Class II airshed As such, the Forest Service does not review Prevention of Significant Deterioration applications and therefore has no regulatory control over new sources of air pollution exterior to the wilderness that can contribute to changes in air quality (like coal burning power plants) related values such as water chemistry, soil ph, and visibility

The air quality related value of visibility will be protected from significant short-term (14 day) visual range impairment as a result of management ignited prescribed fire smoke from outside the wilderness

No alternative presented in this document will have any significant effects on these resources Nor will there be any discernable difference among alternatives

Issue 9. Extent fire is allowed to play its natural role in the ecosystem.

Based on historical fire occupance, about one third of fires within the wilderness are lightning-caused fires It is these fires, and a limited number of management-ignited fires, which will be allowed to burn under certain conditions All human-caused fires will be managed under a suppression strategy

Effects common to all action alternatives.

Effects on public safety. The most serious threat to public safety is if an individual or group were located in a drainage above a fire during high or extreme fire danger and the fire began burning at a high intensity and rate of spread in the tree crowns Normally fires that burn at this high elevation and timber type are low intensity and spread at a slow rate in the ground fuels

It is difficult to predict what people would do in the wilderness if fires were burning at different stages of development It is more than likely that they would still visit the wilderness, perhaps in a different drainage than originally planned Users already in the wilderness may change their routes to detour around a fire This may cause inconvenience but would be a part of the wilderness experience

The degree of threat to the public in the wilderness due to management of prescribed natural fire, is no different from one alternative to another Regardless of the alternative selected, a number of safety measures would have to be implemented to insure the safety of the public All trail heads entering the wilderness would have to be

posted with signs briefly explaining the wilderness fire policy. When any fires were being managed and monitored, cautionary posting would be necessary at trail heads below the fire. During extreme fire danger periods it may be necessary to close main drainages to the public when a fire or fires were being managed. The Ranger Districts responsible for management of the Wilderness would be heavily impacted by these safety measures. If they could not be fully implemented it would be necessary to take suppression action.

As with the threat to public safety, the degree of threat of a prescribed natural fire escaping from the wilderness is no different from one action alternative to another. There are isolated instances when suppression action would be necessary to maintain management fires in prescription, when they threaten escape from the wilderness. However, in most cases, fires would actively burn uphill toward the barren slopes away from the wilderness boundaries.

Effects of fire on the natural balance of the ecosystem. Allowing prescribed natural fire within the wilderness will in the long-term improve the natural ecosystem balance. Fire within the ecosystem may lessen the possibility that mountain pine beetle infestations could develop. A healthier mosaic should result as diversity in age class is improved. Allowing fire to assume a more natural ecological role in the wilderness would benefit aspects of biodiversity and succession in the ecosystem in the long-term.

Alternative 5 (No Action).

Effects on public safety. Suppressing lightning-caused fires will lessen the threat to public safety compared to the action alternatives. However, because the historic annual fire occurrence and acres burned in the HUW is very low, the difference is negligible. Visitors to the wilderness may feel safer knowing some suppression efforts are being made.

Effects of fire on the natural balance of the ecosystem. The functioning of ecosystem components are controlled by various natural processes. Green plants, through the process of photosynthesis, capture solar energy and convert it to chemical energy. Biological systems are dynamic and continually changing. The chemical energy captured in green plants must eventually go somewhere.

One method of energy transfer of organic matter is through organic decomposition which results in the slow release of energy. Organic matter decomposes at a slower rate than the rate at which organic matter accumulates until sufficient mass is present so that annual decomposition amounts equals the annual organic growth or addition. It is estimated that it takes 300-500 years in the Rocky Mountains for this equilibrium condition to be reached (Bradley, 1992). The dynamic equilibrium between organic matter accumulation and energy release is significantly affected by fire. Stability in a forest can remain relatively constant for thousands of years in spite of severe, short term disturbances (Wright, 1982).

The history of fire in the western United States has evolved through both climatic and

cultural ignition sources. It is evident from fire scars through out the HUW, that the evolution of vegetative composition has repeatedly been influenced by fire. Nonetheless, over time an equilibrium is maintained over the forest mosaic. The fire management objectives for intensely managing relative small areas with short rotation age are significantly different than those for large natural areas that have developed and evolved by systems that have been present for thousands of years. Preventing natural disturbances in the system will eventually lead to a lessening in the diversity and unpredictable consequences. One of the most profound influences that man may have on a natural ecosystem is the elimination of fire as a disturbance (Wright, 1982).

The fire suppression efforts which began in the early 1900s until the mid-1990s have had little effect on the successional stages for the lodgepole pine stands. According to Pfister and others (1975), lodgepole pine becomes a climax species where the absence of catastrophic disturbance, such as fire, permits the development of dense lodgepole stands that prevent any conifer regeneration until the stand deteriorates. When lodgepole pine is the climax species, it is essentially the only tree present on the site. Consequently, succession is dominated by lodgepole pine at all stages of development, and even several centuries without fire may not change species composition. This appears to be the case in the High Andes Wilderness since vast areas apparently burned between 1843 and 1875. Many of the lodgepole pine stands on the south slope are between 100 and 200 years old. They are not presently over-mature and ready for large scale high intensity fires.

Continued efficient fire suppression efforts in the HUW will inevitably upset the natural ecosystem balance. If fire suppression efforts were to continue in the High Andes Wilderness and the stands become mature to over-mature, there is the strong possibility that mountain pine beetle infestations could develop. Lodgepole pine stands depleted by the beetle and not subject to fire are eventually succeeded by the more shade-tolerant species consisting primarily of Douglas-fir at the lower elevations and subalpine fir and Engelmann spruce at the higher elevations. Starting with a stand generated by fire, lodgepole pine grows at a rapid rate and occupies the dominant position in the stand. Fir and spruce seedlings also establish in the stand grow more slowly that lodgepole pine. With each infestation, the beetle kills most of the large, dominant lodgepole pine and the shade-tolerant species increase their growth. When the lodgepole pines are of adequate size and phloem thickness, another beetle infestation occurs. This cycle is repeated at 20- to 40-year intervals depending upon growth of the trees, until lodgepole pine is eliminated from the stand.

<u>Issue 10</u>. Archeological and historic sites.

Effects common to all alternatives. For archeological and historic sites, wilderness designation and consequent management is sometimes considered an adverse effect (J. Dyckmann, Utah-SHPO, personal communication). This perspective is based on an assumption that sites in wilderness are often allowed to deteriorate, rather than have

active preservation management through site stabilization, analysis and excavation, or interpretation for the visiting public

Contrarily, wilderness designation and management can set aside large numbers of sites in settings where few degrading effects other than natural processes are active The historic preservationist analyzing effects to historic and prehistoric sites from this perspective may welcome wilderness conditions as favorable to those where people have freer rein to change that setting to meet their needs This school of thought maintains that in wilderness, cultural resources over 50 or 100 years old have had relatively few human induced disturbances, and the overall distribution of sites in a large area has not been affected as in non-wilderness where many sites and complexes of sites have been erased from the record

Either perspective is not wholly correct, but each holds elements of truth that can be used to make wilderness an uniquely valuable setting for understanding humans in the past and their interaction with landscapes over time Proactive research in archeology and studies of human effects on environmental settings have few better laboratories than wilderness

For the High Andes, it is believed that the alternatives developed will be equal with respect to potential effects to archeological and historic sites No alternative presented in this document will have any significant effects on these resources, nor will there be any discernable difference among alternatives

Issue 11. Research Natural Areas (RNA).

Effects common to all action alternatives. Values of RNAs are maintained under all alternatives Shale Creek RNA is in Class I in all alternatives Proposed Painter Basin RNA is in Class II in all alternatives

Alternative 5 (No Action). The Ashley Forest Plan directs managers to not encourage use and even discourage, or limit use in RNAs Additional direction includes closing the area to grazing after official designation of RNA and not allowing wildlife improvements or trail maintenance No environmental effects will be realized to RNAs by implementing the No Action Alternative

There are no designated or proposed RNAs on the North Slope of the HUW

Issue 12. Extent stocking of previously fishless waters with fish effects historic aquatic natural processes.

Effects common to all action alternatives. It is recognized that fish stocking can cause excessive human use in some areas and that stocking can interfere with historic aquatic natural processes

Holden (et al 1996) recognized that impacts to historic aquatic natural processes have occurred due to stocking fish in previously fishless waters

At present, the State of Utah only stocks lakes two surface acres in size or larger (personal communication with C Crosby, UDWR), and the stock less than 50% of those within the wilderness (GIS data

analysis) Habitat available for Tiger Salamander, Boreal Toad, Boreal Chorus Frog, Woodhouse's Toad, Great Basin Spadefoot Toad and a variety of invertebrates is abundant in over 1000 fishless water bodies

All action alternatives maintain adequate habitat for the above species

Historic aquatic natural processes (prior to human induced change) in currently or historically stocked waters, will be difficult, if not impossible, to fully restore It is likely that if stocking is precluded, amphibians will migrate back into the lakes, macroinvertebrate communities are likely to recolonize, but zooplankton and other invertebrates species may not However, zooplankton and other invertebrates can be reintroduced with human intervention

All action alternatives require a Memorandum of Understanding (MOU) agreement to implement possible changes in current fish stocking practices

Specific research and/or monitoring has not been done to determine the effect of recreational fishing, (including camping, social trails and social impacts) on physical, biological and social resources around stocked and naturally reproducing lakes in the HUW However, professional judgement and observation suggests that effects to vegetation, soils, water, and social experience are significant around some popular lakes

Alternative 1. Alternative 1 identifies approximately 20 lakes in Class I that may qualify for a change in stocking practices

Alternative 2. Alternative 2 identifies approximately five lakes in Class I that may qualify for a change in stocking practices

Alternative 3. Alternative 3 identifies approximately 60 lakes in Class I that may qualify for a change in stocking practices

Alternative 4. Alternative 4 identifies approximately 15 lakes in Class I that may qualify for a change in stocking practices

Alternative 5 (No Action). It is recognized that fish stocking can cause excessive human use in some areas, and that fish stocking can also shift aquatic natural processes These shifts do not significantly alter existing habitat and populations of the above species in the no action alternative

Environmental Effects of Each Alternative

ISSUE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5 (No Action)
	Class I-23% Class II-68% Class III-9%	Class I-14% Class II-61% Class III-25%	Class I-40% Class II-58% Class III-2%	Class I-17% Class II 78% Class III-5%	No designation of Classes. Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts.
1. Human overuse threatens integrity of ecosystem components.	No threat to ecosystem function.	Threat is expected to be low, but higher than for other alternatives.	No threat to ecosystem function.	Threat to ecosystem function is expected to be very low.	Threat to ecosystem function is expected to be very low.
2. Extent visitor solitude and primitive recreation experience are affected by other recreationists, resource damage and rules and regulations.	Compared to Alternative 5, existing opportunities for solitude are enhanced in areas that currently do not meet Wilderness standards. However, increased regulation is likely in these areas (Naturalist Basin and west end of Highline Trail).	Compared to Alternative 5, opportunities for visitor solitude are highly threatened due to increased Class III areas. Like Alt 1, increased regulation is possible in areas moving from Class III or II to Class II or I. However, threat of increased regulation is very low.	Compared to Alternative 5, opportunities for visitor solitude are highly enhanced due to increased Class I areas and decreased Class II & III areas. Like Alt 1, increased regulation is possible in areas moving from Class III or II to Class II or I. Therefore, threat of increased regulation is higher than for other alternatives.	Compared to Alternative 5, opportunities for visitor solitude are moderately enhanced due to slightly decreased Class III areas. Like Alt 1, increased regulation is possible in areas moving from Class III or II to Class II or I. Therefore, threat of increased regulation is moderate.	The area maintains current solitude conditions, except where it is highly threatened in areas that do not currently meet Wilderness standards (Naturalist Basin and west end of Highline Trail). Increased regulation is likely in above areas to enhance wilderness qualities.

ISSUE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5 (No Action)
	Class I-23% Class II-68% Class III-9%	Class I-14% Class II-61% Class III-25%	Class I-40% Class II-58% Class III-2%	Class I-17% Class II-78% Class III-5%	No designation of Classes Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts
3. Extent outfitting and guiding operations are affected by use limits and desired conditions (Class designations)	Minor negative economic effects in some drainages	20%-50% reduction in service days available in Yellowstone and Uinta With redistribution, negative economic effects are minimal	8%-61% reduction in service days in several drainages. Negative economic effects are higher than for other alternatives	No negative economic effects	*Stock, N. Slope* 2 hunting O Gs (300 service days each) *S. Slope* 5 hunting fishing O Gs (service days limited by existing use patterns/resource conditions) Education other (service days limited by existing use patterns/resource conditions)
	Total service days available stock 1850 n-stock 2550 4400	Total service days available stock 1475 n-stock 2550 4025	Total service days available stock 1300 n-stock 1825 3125	Total service days available stock 2050 n-stock 2950 5000	
	Maximum outfitter permits available *Stock outfitting*: no more than seven *Non-stock outfitting*: no more than four No new outfitting permits will be issued				*N. Slope*: no more than 2 in wilderness at one time *S. Slope*: no more than two per district at one time
4. Extent system trails meet wilderness objectives	23% of area has no system trails. Increased erosion and sedimentation from trail activities is less likely than Alternative 5	14% of area has no system trails. Increased erosion and sedimentation from trail activities is most likely when compared to all other alternatives	40% of area has no system trails. Increased erosion and sedimentation from trail activities is least likely when compared to all other alternatives	17% of area has no system trail. Increased erosion and sedimentation from trail activities is less likely than Alternative 5	No system trails on approximatley 23% of the acerage. Increased erosion and sedimentation from trail activities is less likely than Alternatives 2 and 4
5. Human and animal wastes threaten water quality	With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality	With enforcement of existing camping and tethering of stock at least 200' from water, threat to water quality very low, but higher than for other alternatives due to increased Class III areas	With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality	With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality	With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality

ISSUE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5 (No Action)
	Class I-23% Class II-68% Class III-9%	Class I-14% Class II-61% Class III-25%	Class I-40% Class II-58% Class III-2%	Class I-17% Class II-78% Class III-5%	No designation of Classes Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts
6. Exotic plant species threaten functions of ecosystem by replacing native plant species	Threat of exotic plant species invading wilderness ecosystem is expected to be very low, but slightly higher levels of exotic species might be expected than with Alternatives 2,3 & 5	More Class III indicates slightly higher opportunity for exotic species invasion and proliferation than in other alternatives. However ecosystem function does not appear to be threatened	No threat to ecosystem function is expected due to decreased levels of human induced disturbance	Threat of exotic plant species invading wilderness ecosystem is expected to be very low, but slightly higher levels of exotic species might be expected than with Alternatives 3 & 5	Threat of exotic plant species invading wilderness ecosystem is expected to be very low, but slightly higher levels of exotic species might be expected than with Alternatives 1, 3 & 4
	An evaluation of vegetation in Grandaddy Basin (1974-1975) showed only two exotic species present in very small amounts and mostly restricted to along trails. No threat to ecosystem function was apparent				

ISSUE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5 (No Action)
	Class I-23% Class II-68% Class III-9%	Class I-14% Class II-61% Class III-25%	Class I-40% Class II-58% Class III-2%	Class I-17% Class II-78% Class III-5%	No designation of Classes Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts
7. Extent wildlife and fish habitat is protected	Habitat effectiveness not compromised significantly	Decrease in habitat effectiveness due to higher human use (25% Class III)	Habitat effectiveness not compromised significantly	Habitat effectiveness not compromised significantly	Habitat effectiveness not compromised significantly
	No effects on federally listed threatened or endangered species. Viability of Forest Service designated sensitive species not threatened				
8. Extent air quality is affected by pollution and prescribed fire	During prescribed burns outside wilderness, air quality may be temporarily effected				
9. Extent prescribed fire is allowed to play its role	Restore fire to the HUW ecosystem by developing prescriptions allowing unplanned natural ignitions (lightning) to achieve wilderness resource objectives. Suppress unplanned human caused fires and those fires that threaten life or property				Continue fire suppression actions
10. Extent archeological and historic resources are preserved	The alternatives are equal with respect to potential effects to archeological and historic sites. No alternative will have a significant effect on these resources				
11. Extent Research Natural Areas (RNA) are preserved	Values of RNAs are maintained under all alternatives				
	Shale Creek RNA is in Class I in alternatives 1-4. Proposed Painter Basin RNA is in Class II in alternatives 1-4				Values of RNAs are maintained
12. Extent fish stocking meets wilderness objectives	Approximately 20 lakes in Class I may qualify for change in stocking practices	Approximately five lakes in Class I may qualify for change in stocking practices	Approximately 60 lakes in Class I may qualify for change in stocking practices	Approximately 15 lakes in Class I may qualify for change in stocking practices	Undetermined Approximately 20 lakes in Class I may qualify for change in stocking practices

chapter five

LIST OF PREPARERS

Chapter V

The following is a listing of the Interdisciplinary Team Members Specific involvement in the preparation of this Environmental Impact Statement is included below

Bernard W. Asay, Wilderness Manager. B S in Forest Recreation Sixteen years with the Forest Service as Wilderness Ranger, Minerals Technician/Forester, Wilderness Manager Provided analysis for Outfitter/Guide, recreation, and Wilderness

Ivan Erskine, Forest Fire Management Officer. B S in Forestry Twenty-seven years with the Forest Service in a variety of fire positions Provided fire analysis

Paul K. Flood, Soil Scientist. B S in Soil Science Eighteen years experience with the Forest Service as a Soil Scientist, Outdoor recreation Planner and a temporary promotion to Forest Watershed Program Manager Provided soils and hydrology analysis

Sherel Goodrich, Ecologist. B S in Range Management M S in Plant Taxonomy Twenty-five years experience with the Forest Service as Range Technician, Fire Management Technician, Range Conservationist, Wildlife Biologist, and Forest Ecologist Provided overall input for vegetation including sensitive plant species and noxious weeds

Mead Hargis, Natural Resource Manager. B S in Biology and 45 graduate units in Environmental Planning Seventeen years in Public Land Management (13 with the National Park Service and four with the Forest Service) Provided input on firewood standard, outfitter guide, and wilderness conditions

Julie Hubbard, NEPA Coordinator. B S in Forest Recreation Fifteen years with the Forest Service as Writer Editor, Public Affairs Specialist and Environmental Coordinator Responsible for environmental compliance and writing and editing documents

Reese Pope, Planning Staff. B S in Forest Management M S in Soils Three years with the Bureau of Indian Affairs and sixteen years with the Forest Service as Forester, Forest Planner and Planning Staff Officer Provided economic analysis

Thomas R. Scott, Archeologist. B A in American History M A in Anthropology Seventeen years experience with Forest Service as Assistant Regional Archeologist shared-service archeologist for Wasatch-Cache, Ashley, and Uinta National Forests and Wilderness Coordinator Provided analysis for social effects and cultural resources and served as Interdisciplinary Team Leader

Gayne Sears, Wilderness Coordinator. B S in Applied Behavior Science Ten years experience with the Forest Service in wilderness management and implementation Interdisciplinary team leader and document coordinator, provided south slope recreation analysis

Chauncie H. Todd, Lands/Minerals Forester. B S in Forest/Range Management Twenty-seven years experience with the Forest Service as Range Conservationist and Lands/Minerals Forester Provided information on Outfitter/Guide permitting

Richard L. Williams, Wildlife Biologist. B S in Wildlife Management Twenty-two years experience with the Forest Service as forestry technician, Fire Management Officer, and Wildlife Biologist Provided overall input for wildlife evaluations including big game and threatened endangered and sensitive species

Richard Zobell, Rangeland Management Specialist. B S in Range/Watershed Science Twenty-one years experience with the Forest Service as a Rangeland Management Specialist including responsibilities for wildlife, watershed, wilderness management, lands, developed recreation, trails and minerals Provided overall input for the range evaluations

The following people acted as consultants during this project

Joe Bistryski
District Ranger
Garth Heaton
Public Service Group Leader
Darlene Koerner
Soil Scientist
Roland Leiby
Hydrologist
Ruth Monahan
Wilderness Coordinator
Wayne Padgett
Ecologist
Fran Reynolds
Public Affairs Officer
Steve Ryberg
District Ranger
Clark Tucher
Ecosystem Group Leader
Leslie Welch
Wildlife Biologist
Sue Wight
Environmental Coordinator

chapter six

LIST OF AGENCIES, ORGANIZATIONS AND PERSONS TO WHOM COPIES OF THE STATEMENT WERE SENT

Chapter VI

FEDERAL AGENCIES

U.S. Department of Agriculture
National Agricultural Library
Natural Resource Conservation Service
U.S. Department of Interior
Office of Environmental Project Review
Fish and Wildlife Service
Bureau of Reclamation
Environmental Protection Agency
Washington Office
Denver Office - Region VIII
National Weather Service

NATIVE AMERICAN GROUPS

Ute Indian Tribe

STATE AND LOCAL GOVERNMENT

State of Utah
Resource Development Coordinating Committee
Division of Wildlife Resources
Division of Indian Affairs
State Historic Preservation Officer
State Conservationist
Division of Water Resources
Governor's Office of Planning and Budget
SLC Parks and Recreation
Rural Utah Coordinator
Duchesne County Commissioners
Uinta County Commissioners
Colorado Basin River Forecast Center
Central Utah Water Conservancy District
Weber Basin Water Conservancy District

UTAH CONGRESSIONAL DELEGATION

Congressman Bill Orton
Congressman Jim Hanson
Congresswoman Enid Waldholtz
Senator Orrin Hatch
Senator Robert Bennett
State Senator Alarik Myrin

ORGANIZATIONS and INDIVIDUALS
(Some received summaries only.)

Greg Miadenka
Dave Howells
Back Country Horseman of Utah
Andrew White
Harold Edwards
Douglas Chinn
Janet Howard
Jay Smith
Jerry Overy
Martin Steitz
Richard Warnick
Albert Collotzi
Dana Landale
Lance Parry

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Joleen Beil
Thomas Tyon
Chris Cummings
Uintah Mountain Club News
South Slope - Outfitter Guide (unnamed)
Uintah Basin Standard - newspaper artile
Will Durant, Uintah Mountain Club
Jack Prescott
Rick Van Wagenen
Erica Wangsgard
David Hoefer
Ralph Duncan
George Nickas
Dick Carter
High Uintas Wilderness Preservation Council
Stan Tixier
Lynette Brooks
Connie Bullis
Margaret Pettis
Environmental Protection Agency
Brent Hansen
Allen Williams
Milton Hollander
Robert Stewart
Department of the Interior
Clifford Bove
Suzanne Jones, The Wilderness Society
S Ronald Lisonbee
Brad Barber
State of Utah, Office of Planning and Budget
John Swanson
Larry Brewer
Peter Hovingh
James Thompson
Randall Julander
Ed Baltz
Rocky Mountain Recreation of Utah, Inc
David Draper
Ken Aimone
Gale Rasmussen
Troy Hone
Duchesne County Commission
Gary MacFarlane
Joel Frandsen
Mike Bardwell
Larry Ayres
Lawny Jackson
Uintah Basin Association of Governments
Mike Bodenchuk
Carl Larson, Larson Livestock Inc
Gerald Gordon, Utah Wildlife Federation
Joe Jessup
North Eastern Outfitters, Packers and Guides Association
Martin and Annie Steitz
Galen R McNemar
Michael Smith
Earlham College, Wilderness Office

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chapter seven

23 July 1996

Bernard Asay
Mountain View Ranger District
P.O. Box 129
Mountain View, WY 82939

Dear Mr. Asay

As a [illegible] of the High Uintas Wilderness Area, I am very interested in your Wilderness Management Plan. I would appreciate it if you would mail me a copy of the DEIS so [illegible] review it. I have some general comments to make at this time regarding management of the area. I agree with and find it easy to abide by current rules. 1a [illegible] the 200 foot camping restriction around streams and lake shores. Although [illegible] to deal with a permit at all takes something away from the experience, I accept [illegible] and feel it does place some accountability on users. The last 1b thing I want to see in the Uintas (or any other area I use) is a first come-first serve permit system. Having experienced this in Big Bend National Park was very [illegible] there was no opportunity to obtain a permit in advance and one simply had to take his chances, driving a long distance and hoping there was a "space". If 1d [illegible] comes down to limiting visitors, please make it reasonably convenient to obtain reservations (that word seems out of place when speaking of wilderness....) and don't require too limiting of an itinerary for individuals making longer trips. Other, more [illegible] ways to limit visitor use is to maintain trails only where necessary to 1e protect the environment, do not improve roads and trailhead facilities, and do not encourage visitors (especially less experienced ones) to enter less-used portions of the area. It is my understanding from the literature that only a dozen or less uses per year can preclude recovery of a campsite. Therefore it may be wise to allow the 1f concentrated use at certain close-in lakes in order to protect other areas. You could limit the number of sites available in zones of high use areas, available on a first come first serve basis. Once these were full, campers would have to go out of the basin or zone to find another site. Having observed large animal impacts to the system [illegible] and domestic livestock) such as bedding areas, I question [illegible] environmental impact of a number of sites around a lake are in total [illegible] especially when expressed as a percentage, and water [illegible] outhouses (and their required use) could prevent water [illegible] these areas if it is a problem.

[illegible] time hunting and packing in the area (and many other [illegible]) I have not noticed an "overcrowding" problem here except at a 1g few lakes close to trailheads. I have chosen to avoid these areas, and have found plenty of solitude available. I feel if it is necessary to control visitor impacts, it should

(1a)Noted

(1b)Management actions to maintain wilderness qualities in the HUW for future generations may include some type of permit system. The kind of permit system proposed will be subject to public review in a project level NEPA analysis.

(1c)removed from content analysis

(1d)There are no plans to implement a reservation system at this time. If the need to implement a reservation system becomes necessary, every attempt will be made to make it convenient to ensure compliance.

(1e)Discouraging use by allowing roads to the trailheads to change in standard of maintenance is an indirect management approach. Many of our trailheads have been developed and some roads to the trailheads were paved or improved, this has contributed to the rise in user numbers. Trails in the wilderness are maintained at minimum standards due to budgetary restraints. Emphasis is placed on protecting the resource. As management is focused on certain drainages, alternative management actions will address access and trailheads.

(1f)Without a permit system which would limit numbers of people using the wilderness, this concept has much merit. It has apparently been working for the past few decades. The High Uintas Wilderness management plan establishes threshold conditions for the maintenance of the integrity of various ecosystem components. The plan also allows for concentrated human uses in Class III areas, many of which contain "close in lakes," up to the point where resource conditions and ecosystem integrity could begin to be affected. Periodic monitoring specified in the plan is designed to provide early warning of impending degradation to resources. Since some areas currently exist where concentration of use has already begun to degrade certain resources, this monitoring is seen as critical to the concept of allowing concentrated use in Class III areas within the limits of acceptable change.

Action alternatives within the plan do not propose any new regulations or changes to encourage the dispersion or concentration of recreation use. However, more pristine areas (Class II and Class I) were conceived to have progressively smaller amounts of acceptable change in resource conditions. These standards, combined with monitoring of condition trends, should provide a measure of protection to these areas. Non-regulatory tools such as user education, site rehabilitation, and resource restoration of overused sites should help as well. Regulatory tools currently exist to help deal with degrading resource conditions in areas that do not currently meet standards as defined by the 1964 and 1984 Wilderness Acts. Although not proposed in the HUW DEIS, similar types of regulations may be needed to be used in the future in specific areas where non-regulatory tools have not been effective in keeping changes in conditions within acceptable limits. For example, diverting people away from high use areas will likely result in more use of areas now infrequently used.

(1g)Overcrowding usually occurs at lakes close to the trailheads. The greater the distance from the trailhead the visitor density decreases. Some Lakes, regardless of distance, will remain as destinations due to the topographical shape of the drainage

to [illegible] by requiring minimum impact camping and other methods I have discussed above, especially in heavily used areas. I look forward to receiving any information [illegible] and thank you in advance for reviewing my comments.

Sincerely,

Greg C. Mladenka
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West Bountiful, UT 84087
(801) 296-0292 home
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(1h) The provisions of the Wilderness Act provide direction for maintenance of values associated with wilderness for future use, these include air quality related values. While more strength is added by the Clean Air Act for Class I airsheds, the referenced standards for the Class II High Uinta Wilderness area is intended for possible mitigation in development of pollution sources during the NEPA stage. Our responsibility requires us to establish standards that will help protect these values and respond to proposed developments that have the potential of impact accordingly.

(1i) Again, the intent here is to protect air quality related values and how it is accomplished is applicable to the Wilderness management strategy. While the U.S. Forest Service is not the regulatory agency for decisions off-Forest, the standard sets a level that needs to be achieved in order to meet specific objectives.

(1l) This is an integrated plan. It establishes desired conditions, standards and criteria for evaluating and monitoring the entire spectrum of resources that make up the wilderness. It focuses on basic resources - vegetation, air quality, soils, wildlife and fisheries habitat parameters. It also sets indicators and standards for recreation use that is integrated with the basic resources.

The fact that the plan does not specifically address grazing, fish stocking, and animal damage control does not mean the plan lacks integration. All the basic resource indicators and standards are applicable to each of these uses. The reason we are not dealing with these specific issues relates directly to law. Grazing is allowed in wilderness, and any adjustments to the grazing program must be made in a context other than wilderness (Grazing Guidelines). Therefore, this plan is not the proper place to discuss the grazing program, other than to integrate it with the vegetation and soil standards. The allotment management plan is the proper context to address grazing issues.

(1j,k,m) This comment(s), as well as comments j, k, and m in your letter, all appear to be directed towards different aspects of the same concern - the disparate treatment within the HUW plan of different user groups (domestic livestock vs. recreational livestock) that could impact the same resources in the same location. Because of this common thread, we have chosen to prepare one response to all of your comments.

We agree that there is inconsistency in the treatment of these two uses in the plan. This relates to the special status granted domestic livestock grazing in the Utah Wilderness Legislation. The Wilderness Act of 1964 and the Utah Wilderness of 1984 provide that livestock grazing can continue in the High Uintas Wilderness. In addition Congressional Grazing Guidelines for wilderness include "There shall be no curtailment of grazing in wilderness simply because an area is designated as wilderness, nor should wilderness designation be used as an excuse by administrators to slowly 'phase out' grazing. Any adjustments in the numbers of livestock permitted to graze in wilderness areas should be made as a result of revisions in the normal grazing and land management planning and policy setting process giving consideration to legal mandates, range condition, and the protection of the range resource from deterioration." Because of this guidance any permitted livestock grazing decisions will continue to be made in Allotment Management Plans and for livestock grazing issues are considered beyond the scope of this document.

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16 September 1996

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 N. Vernal Ave
Vernal, UT 84078

Dear Mr. Kulesza

Thank you for the opportunity to review the DEIS for the management of the High Uintas Wilderness Area. I have the following comments to offer

Several of the indicators and standards should be re-assessed in order that they will be measurable and controllable from the Wilderness Managers' standpoint

[illegible] standards should be specific to un Forest [illegible] as the Forest Service has no control over impacts from urban and private [illegible] sources. 1h

Similarly, the [illegible] standard could be affected by aerial inputs outside Forest Service jurisdiction. It is unclear how a [illegible] 10% reduction due to off-site acid precipitation or other factors would be remedied by changes in Wilderness management. 1i

[illegible] bedding and tethering of recreation livestock are warranted. However, [illegible] certainly be overlapping impacts due to cattle and sheep operations present [illegible] area. For example, in some situations, livestock tend to spend a majority of 1j 1k [illegible] riparian (both lake and stream) environments. This may affect soil [illegible] and yet in the document there is no connection with these potential [illegible] and that of recreational users and their stock. On page 1-11, it is stated that [illegible] continue to be made in Allotment Management Plans or the [illegible] that it is stated that "Any adjustments in the numbers of [illegible] Wilderness areas should be made as a result of [illegible] and management planning and policy setting [illegible] mandates, range condition, and the protection [illegible] from deterioration [illegible]. The High Uintas Forest Management [illegible] the perfect vehicle to [illegible] the effects of ALL users 1l [illegible] effects and needs of the two groups. I disagree that [illegible] should be left to a separate management plan. It appears 1m [illegible] ineffective to place restrictions on recreational stock [illegible] in a basin that also serves as a cattle or sheep allotment. No one is [illegible] riparian areas, and in many instances, their impacts are

Fortunately, other Forest Plan direction (1996 WCNF Rangeland Health Amendment) exists that protects riparian and wetland areas from improper grazing use, irrespective of wilderness designation. However, recreation stock are not covered in special provisions in the Utah Wilderness Act nor by the above Congressional Grazing Guidelines. Also, grazing techniques and practices are somewhat different between domestic and recreation livestock. Thus standards for management of recreation stock are considered needed and appropriate in this document. Some restrictions are already in place. In particular, a special order giving general direction on inappropriate containment of stock is already in effect for the entire HUW.

In certain confined basins with a particular shortage of good pasture and bedding areas, recreational livestock can have significant effects on riparian and wetland areas. These effects are acknowledged for the No Action alternative on page 4-4 of the HUW EIS. Connection between potential impacts and recreation stock is also made on page 2-14. Also, on page 2-10 the following HUW wide special order is described: "stock cannot be tethered within 200 ft of water sources for more than 2 hours". Finally, a special order has been placed to close one basin to overnight recreation livestock use where riparian and wetland damages have become unacceptable. However, not all recreation livestock use occurs near surface water sources. In particular, recent campsite condition monitoring has documented significant effects on soil quality and erosion from improper techniques and use by recreational livestock in wetlands and riparian areas far removed from any surface water sources.

In an effort to better monitor and manage recreational livestock, special soil quality standards were designed to be incorporated into the action alternatives of the HUW management plan. These standards were specifically intended to allow for the monitoring of the location and extent of detrimental effects on soil and water quality due to foot and hoof traffic of recreation users and livestock.

(1o) Habitat units is an important aspect in the monitoring of any species and will be considered with neotropical birds. One advantage to the standardized neotropical bird surveys is when you compare them to what is happening regionally or nationally. Decreased numbers regionally or nationally probably indicate problems in their wintering areas in other countries. However, if we have decreases in numbers in our local area that do not show up regionally or nationally, it is a red flag that something may be going on locally.

(1p) Selected sites and random sites for monitoring have already been established in the High Uintas Wilderness as well as areas outside the Wilderness. Selecting sites for monitoring has been an ongoing process for the past several decades. A system of random plots referred to as the 5000 meter grid was established in the early 1990s. This system of random plots addresses the issue of preventing bias and provides for a cross section of the total system. The random site selection has much value to put into perspective the amount of use actually occurring on the ground. Very few if any of the random plots fell on trails, camp spots, or other areas of obvious use. The random point sample indicates very low levels of overall use. One of these points was within 200 feet of a trail near Lake Atwood. No effect of the trail could be found at this distance from the trail.

This seems typical. In much of the wilderness, there is little evidence of disturbance beyond a few feet of trails. This does not reflect the visual qualities of seeing trails from vistas nor seeing other people and pack stock along trails. However, it does reflect the actual effects to resources.

certainly comparable to those of recreational stock. [I am not encouraging elimination 1n
of commercial livestock operations in the Wilderness, but I do feel strongly that ALL
users should be held to similar standards]

[Neotropical bird standards must be limited to habitat units rather than numbers, as 1o
these birds are migratory, and habitat degradation thousands of miles distant, in other
countries may have profound effects on populations]

[For vegetation standard monitoring plans, both random site selection and long-term 1p
monitoring sites should be used to prevent bias, and to evaluate a cross section of the
total system]

[In reference to riparian types, the rationale section mentions "(E and others)" 1q
regarding stream types. If the Rosgen system is to be used, that probably should be
clarified in the document]

The monitoring plan for campsite density may be biased if only a portion of a drainage is monitored. The mean density for a drainage may be inflated if a study area is
extrapolated to an entire basin. [Clustering of campsites may actually increase the 1r
availability for solitude outside of those high use areas] For example, there may be many sites in frequent use in an area around a popular fishing lake. If a user wants
solitude, he can find it outside this "zone of influence", whereas [if all users are 1s
encouraged or forced to "spread out", it may become more difficult to find sites
isolated from other users]

[Fourteen people and fifteen stock is a LARGE group. Will it be difficult to separate the 1t
standards for Class I versus Classes II and III? Limiting group size to 7 people and 7
stock over all classes seems preferable]

[A [illegible] day stay at one campsite will certainly cause significant damage to the 1u
area] Possibly it will recover if left alone for several years; however, I have seen
[illegible] groups return to such areas year after year. [Would it be better to limit 1v
[illegible] any particular site to 2 or 3 nights, or would that be counter productive,
[illegible] etc?]

[[illegible] Rationale: "visitor use should not effect" Effect should 1w
[illegible] the context]

[[illegible] defined in regard to wood gathering standards] 1x

[[illegible] should probably be seasonal in some areas, as winter users 1y
[illegible] use different wood sources (further from the ground, more large deadfall than
[illegible] and branches) than summer/fall campers]

[[illegible] "species fish" should be "species of fish"] 1z

In addition, campsites are being monitored in each drainage using a modified form of Cole's Campsite Assessment Rating system. This system measures vegetation cover in relation to cover existing in a similar site a few meters from the campsite. Data from the campsite assessments will assist managers in determining trends in vegetation cover at specific sites in the wilderness. (See pg 2-16 for standards associated with campsite assessments.)

(1q)Rosgen's system of stream classification is based on entrenchment, gradient, width/depth ratio, and sinuosity of streams in various landforms. Within each major category, additional types are delineated by dominate channel materials from bedrock to silt and clay along a continuum of gradient ranges. Management interpretations have been developed for the various stream types (Rosgen 1994). From these interpretations, sensitive reaches of streams can be identified. The classification and management interpretations are very useful in selecting monitoring sites and addressing potential impacts to riparian areas. Stream reaches set in bed rock and large rock debris, (A1, A2, G1, G2 and other stream types) are very resistant while those setting in fine sediments are more sensitive to disturbance such as most E and D stream types and C4 through C6 stream types.

(1r)There is no attempt to cluster campsites. The concentration of campsites have developed due to the ease of access and the desirability of present cluster locations. But, you are correct in that the farther you are away from concentrated sites the greater the potential is for solitude.

(1s)Research suggests "It is more effective to avoid new [human use impacts] rather than recover old impacts" (Cole, 1987). With this in mind, managers will concentrate efforts on maintaining consistent use patterns in higher use areas as suggested in leave no trace concepts.

(1t)At present between [illegible] and [illegible] of wilderness visitors travel in group sizes of [illegible] or less. The desired condition description for Class I has been changed to delete the restriction of 7 people and 7 stock for overnight use, because these numbers may or may not meet the intent of the Class to "manage the area for very low use." The desired condition description challenges groups who visit Class I areas to travel in small groups (Cole, 1987). For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted.

Popular guide books (Davis and Veranth, 1993) and Leave No Trace publications (Will Harmon, 1994), suggest that large groups can cause greater resource impacts in more pristine areas.

(1u)Human induced change to the landscape depends on many factors. In some vegetation types length of stay can cause damage to vegetation. If however, a site is chosen well and camped on lightly, resource conditions are not likely to show deterioration. Indicators and standards as listed on pages 2-11 through 2-17 address activities and conditions associated with campsites. Application of these standards are expected to prevent human induced changes to the resources.

On S 32, #2 effected should be "affected". Also, increased regulation in areas such as Naturalist Basin should allow for "through travelers", i.e. those simply using the trailhead as a beginning point on a long trip, as compared to those hiking into the basin. 1aa

On S 33, effected should be "affected". If there are choices to be made in regulating users, outfitting and guide operations should shoulder most of any increased regulations/limitations on use. Although some argue outfitters teach wilderness ethics, that is certainly not always the case, and is little justification for management in their favor. If lack of wilderness ethics becomes a significant problem arising visitors, the Forest Service could require a wilderness orientation course for all users in a fashion similar to state-required hunter safety courses. It is unfair to restrict those who have developed wilderness skills, when a "paying customer" would be able to take a trip whenever they wished. An example of this type situation may be found on the Middle Fork of the Salmon and Colorado Rivers, where experienced boaters may have to wait years for a chance at trip, while people with NO boating skills whatsoever can simply buy a trip down the river. 1bb 1cc

On S 4-19, it is stated that Alternative 1 provides "significant opportunities for growth" in commercial guiding. Again, I am against increases in commercial outfitting in areas that have "underuse" as given the current growth and wilderness use trends in the state, such areas won't be "under-utilized" for long. Any increase in commercial use would increase the overall use of areas such as Rock Creek and some of the side drainages, helping to approach LACs and force more regulation. It seems difficult to reduce commercial use once it is present, and the likely alternative would be to retain such use at the "recreational expense" of non-commercial users. 1dd

On S 4-21, I strongly support eliminating duplicate trails, and re-routing trails currently having significant wetland/riparian impacts. Again, to avoid promoting use, I support maintenance level 1, sometimes maintenance level 2, but not maintenance level 3 under any conditions. 1ee

Thank you again for the opportunity to comment on the DEIS. I wish you the best in making appropriate decisions regarding the management of this area.

Sincerely,

Greg C. Maddeaux
1383 N 800 W
West Bountiful, UT 84087
(801) 296-0292 home
(801) 538-7375 office

(1v)Prolonged stays by one group seem most likely to occur on the most desirable and suitable campsites in heavily used, close in basins. During peak recreation season, these campsites will almost certainly be occupied more or less continuously, either by one group or a succession of separate groups. In this case, the effects of continuous occupation on a campsite would be the same regardless of whom is using it.

Effective education of all user groups in the techniques of minimum impact camping is one way to minimize the effects of continuous use of campsites in heavily used close in basins. However, since it is hard to educate away a dead tree, a gully, or trampled vegetation once they exist, some mechanism must be in place that monitors trends in campsite condition. The indicators and standards on pages 2-11 through 2-15 were designed to provide early warning of degrading resource conditions and the need for campsite rehabilitation, closure, or restoration. In extreme ca[illegible] when these non-regulatory techniques have failed to reverse downward campsite condition trends, visitor permit and distribution regulations may become necessary. Monitoring and enforcement of standards can be expected to be difficult.

(1w)Typo is corrected.

(1x)Area refers to any area showing signs of depleted or scarce dead and down woody material.

(1y)We agree, the standards have been changed to identify summer use for campfire restrictions (pg 2-16).

(1z)Typo is corrected.

(1aa)Typo is corrected. Through travelers do not cause overnight impacts like those noticed and regulated for in Naturalist Basin.

(1bb)Typo is corrected. Where general public use is high outfitters are limited. However when and if ecological and social standards are exceeded, both outfitters and the public will be asked to adhere to corrective actions.

(1cc)Many options exist amongst the variety of management actions available. Actions need to be evaluated relative to other options for their ranking by the "minimum tool" concept, their cost, and the ability to be successfully implemented. The "minimum tool" concept implies that the minimum tool or management action chosen is appropriate and is only what is needed to protect the wilderness resource. Management actions run along a continuum from the benign, i.e., a sign, to law enforcement actions. This allows managers to use the "minimum tool concept" in choosing a course of action to address impacts. Enforcement through education is the preferred approach by the Forest Service.

(1dd)Allowing for growth in commercial guiding is to meet management needs and objectives.

(1ee)Maintenance level 3 should state that trails are maintained at a slightly enhanced preservation of investment. Thank you for your attention to detail. We made the correction on page 4-21.

HIGH UINTA BACK COUNTRY HORSEMEN
P O Box #933
Kamas, Utah 84036

September 15th, 1996

Bert Kolterja, Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, Utah 84078

Dear Sir

We appreciate your invitation to comment on the Draft Environmental Impact Statement (DEIS) for Management of the High Uintas Wilderness. Please consider the following concerns

It seems to us that anything which simplifies a plan --divisions, policies, and or practices, or the elimination of these -- will almost always improve management effectiveness and render the product more appealing to the users. On the other hand, any division, policy, or practice which is not clearly necessary tends to complicate matters, multiply problems, and diminish the effectiveness of the plan.

Given the current budgetary constraints now facing the Forest Service, it appears [illegible] the proposed management [illegible] too complex to be realistically achieved with existing manpower and financial resources. If this observation is correct, implementation of the proposal will likely impede, rather than enhance, efficient management and confuse would-be users trying to unravel the maze of complicated details. Such confusion would undoubtedly lead to frustration and eventual conflict. Let's not make the management plan so complex that it unnecessarily [illegible] the opportunity for people to share and enjoy the wilderness. 2b 2e

Not too long ago the Ashley and Wasatch-Cache Forests each had different user group [illegible] limitations. This resulted in confusion and consternation among wilderness users. During the LAC exercise these two Forests adopted a uniform limit of 14 people and 15 head of stock which eliminated much of the confusion for all concerned. This was formalized in Special Order 36 CFR 261.54(d). The numerical limit itself, however, is not so much an issue as is the amount of abuse [illegible] to the environment by uninformed or careless users and their animals. One horse, improperly cared for, can do more damage than fifteen animals prudently handled by knowledgeable and considerate users. Having numerical limits which vary from one wilderness condition class to another will likely create user confusion and increase management expenses. We submit that an effective education program would be a better solution than management by elimination and believe that most problems could be resolved if users were to be instructed in practices friendly to the environment before entering the wilderness areas or using wilderness trails. It would also allow more people to enjoy a true wilderness experience and at the same time protect the environment. If necessary, compliance with proper practices could be enforced through a fine process. 2d

We feel all trails within the wilderness should be well developed, maintained, and signed in accordance with desired conditions outlined for Class III areas. Contrary to the seemingly popular philosophy that the elimination of trails will enhance the return of wilderness to its on- 2e

(2b)Complexity is inherent in ecosystem management. Budgetary constraints are a reality. Innovative means of accomplishing our tasks is essential. Writing proposals for grants and seeking partnerships with non-governmental organizations is essential. The development of well thought out management plans helps to focus the allocation of resources, i.e., the establishment of desired condition classes helps to serve that purpose. Monitoring of biological and sociological systems are complex and cannot be performed all at once. But, this plan establishes the frame work to direct efforts into the future and with the advent of modern technology the complexity is reduced to a manageable ecosystem portrayal of interrelated systems.

(2c)Complexity is inherent in ecosystem management. Most users will not be affected or have any need to be exposed to the actual management plan. Resource specialists are expected to be scientific in their monitoring and analysis. The disciplines often require a degree of complexity to have viable data to evaluate. The opportunity classes help wilderness managers to allocate resources for data collection. The users are not likely to be directly affected with the exception that Class III areas will receive greater attention.

(2d)Presently, 20-30% of the visitors to the HUW travel in groups more than [illegible]. To mitigate confusion, managers will target larger groups for extra education efforts, but it is the responsibility of the visitor to understand and follow leave no trace techniques, especially while traveling in pristine areas.

(2e)Maintaining all trails to the same level as found in the [illegible] Class III area is beyond the budgetary ability of the Forest Service. Class III areas endure the most traffic and are more susceptible to tread wear and erosion. Partitioning the desired condition classes enables the Forest Service to set varying standards dependent on use received. If more user groups would volunteer their time to do trail maintenance, this would help alleviate the burden of trail maintenance.

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[illegible] that the elimination of trails will enhance the return of wilderness to its original pristine state, whatever that was, is the idea that trails, properly maintained and used, actual[ly] protect the integrity of wilderness. It has been our observation that when trails are non-existent [illegible] or ambiguous, users tend to blaze new routes, often damaging or defacing the [illegible] as they go. While it is true that trails evidence the presence of people, they, when properly designed and maintained, often eliminate arbitrary damage to the wilderness and [illegible] the associated ecosystem. 2l

After comparing the alternatives, there really seems to be little difference in the care and management of Alternatives 1 and 4. We do not agree with the selection of Alternative 1 as the preferred proposal and strongly recommend the adoption of Alternative 4 instead. 2g

a. Alternative 4 is less complicated than the other three altenatives and would require fewer changes to existing practices, thus simplifying implementation.

b. There are fewer Desired Condition Class areas in Alternative 4 than in the others. This means fewer ambiguous boundary lines, less confusion, and more continuity.

c. There is more Desired Condition Class II space in Alternative 4. It is our consensus that Class II space, as defined in the DEIS, provides more users a "true wilderness experience" than any of the other classes. Within the context of wilderness and the purview of recorded time there are few places, including the High Uintas, that are totally immune from human influence. Those [illegible] who most often frequent the Class II areas defined in the DEIS, know that they too provide outstanding opportunities for solitude and unconfined recreation and require a remarkable degree of self-reliance.

d. Alternative 4 has far less Class III space. Some Class III areas have been so abused that they no longer meet acceptable wilderness standards. We submit that these areas should be re[illegible] through sound administrative practices such as reduced public access and mandatory education [illegible] users. Alternative 4 would seem to be the better plan for upgrading neglected Class III areas.

There seems to be an idea, prevalent among many who frequent the High Uintas, that the Forest Service is attempting to manage the wilderness Area by a process of elimination. We sincerely hope this is not the case. There is a better way. Education! Regardless of the alternative [illegible] success will be contingent on candid and legitimate education. The more involved and complicated a plan becomes, the more susceptible it is to misunderstanding and violation. If managers wish to avoid confusion, frustration, and discontent, they must develop means to disseminate necessary information broadly and in detail. Most users of the High Uintas Wilderness will [illegible] well acquainted with the topography. Unless properly educated they will be more [illegible] to confusion and subsequently to violations. We recommend the Forest Service, in [illegible] with organized user group, develop and implement an education program designed to teach all users the proper care and use of our wilderness. 2h

If we, the Back country Horsemen of Utah, can be of help in any way in promoting proper wilderness practices or in sustaining or improving our primitive back country, please feel free to contact Dave Howells at [illegible] 752-4955.

Respectfully Submitted By,
High Uinta Back Country Horsemen
Authored By,
Dave Howells, President of Board of Directors
Back Country Horsemen of Utah

(2l) Your observation is accurate and is one of the driving forces for maintaining a trail system. All trails do not necessarily need to be at the same standard and can provide wilderness challenges while still protecting the resource. Instituting a class system is a means of varying the maintenance to provide various opportunities and experiences.

(2g) In response to part a: The use of desired condition classes is applied to this plan as a means to allocate resources by acknowledging diversity in use patterns and user behavior. Establishing varying classes in the wilderness, allows management to use different strategies for different sections of the wilderness. The kind and intensity of management can be varied based on the desired condition sought. Without using classes to allocate management resources and efforts, there is an inherent danger that the entire wilderness may degenerate to some minimum standard due to an unfocused management approach. Defining these classes provides managers with a tool to enhance the protection of wilderness.

In response to part b: Most Class boundaries were drawn according to [illegible] features, and in relation to historical recreational use areas. As a result, the Forest Service does not expect that most visitors will need to be concerned with whether they have crossed a Class boundary and must now behave differently.

In addition, some suggestions have been made to adjust the public wilderness maps to display the Classes in a visitor friendly way. In addition, designation of classes is primarily used to focus management on popular areas while allowing allocation of resources to be applied as needed to maintain or monitor less popular areas.

In response to part c: The Forest Service recognizes the fact that wilderness visitors do not all seek the same kind of wilderness experience. Its quite obvious that some areas are Class III because of their popularity and the probability of encountering other groups. The majority of our wilderness visitors are using these areas and they have a legitimate right to have this opportunity. There are also those users seeking an even more remote and solitary type of experience. Their demands are also legitimate. The wilderness must be managed for a wide spectrum of wilderness opportunities.

In response to part d: In all alternatives, areas that are degraded beyond the intent of the Wilderness Acts will be targeted for rehabilitation.

(2h) Certainly wilderness visitor education has been and will continue as a high priority for managers of the HUW. With completion of this planning process, managers will have more time to focus on effective education strategies (which in all honesty runs the continuum from Leave No Trace programs for organized groups to regulation and enforcement of problem behaviors).

Back Country Horsemen of Utah

P.O. Box 13195 Ogden, UT 84412-3195 (801) 625-3127 & 299-2727 SLC

[illegible]

[illegible] NATIONAL FORESTS

[illegible] Ashley National Forest
[illegible] Supervisor, Wasatch Cache National Forest

[illegible] to comment on the Draft Environmental Impact [illegible] Management of the High Uintas Wilderness. Please consider the [illegible]

[illegible] anything which simplifies a plan -- divisions, policies, and or [illegible] these -- will almost always improve management effectiveness [illegible] appealing to the users. On the other hand, any division, [illegible] which is not really necessary tends to complicate matters, multiply [illegible] the effectiveness of the plan.

[illegible] budgetary constraints now facing the Forest Service it [illegible] management plan is too complex to be realistically achieved [illegible] financial resources. If this observation is correct, [illegible] will likely impede, rather than enhance, efficient management [illegible] the maze of complicated details. Such [illegible] management plan so complex that it unnecessarily diminishes [illegible] and enjoy the wilderness.

[illegible] Ashley and Wasatch Cache Forests each had different user [illegible] in confusion and consternation among wilderness users. [illegible] these two Forests adopted a uniform limit of 15 people and 15 head [illegible] much of the confusion for all concerned. This was formalized in [illegible] The numerical limit itself, however, is not so much an [illegible] inflicted on the environment by uninformed or careless users [illegible] improperly cared for, can do more damage than 15 animals [illegible] knowledgeable and conscientious users. Having numerical limits which vary from one wilderness condition class to another will likely create user confusion and [illegible] management expenses. We submit that an effective education program would be a better [illegible] than management by elimination and believe that most problems could be resolved if users were to be instructed in practices friendly to the environment before [illegible] wilderness areas or using wilderness trails. It would also allow more people to

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[illegible] a true wilderness experience and at the same time protect the environment. If necessary, compliance with proper practices could be enforced through a fine process.

We feel all trails within the wilderness should be well developed, maintained, and signed in accordance with desired conditions outlined for Class III Areas. Contrary to the seemingly popular philosophy that the elimination of trails will enhance the return of wilderness to it's original pristine state, whatever that was. We believe that trails, properly maintained and used, actually protect the integrity of wilderness. It has been our observation that when trails are nonexistent, poorly kept, or ambiguous, users tend to blaze new routes, often damaging or defacing the natural environment as they go. While it is true that trails evidence the presence of people, they, when properly designed and maintained, often eliminate arbitrary damage to the wilderness and abuse of the associated ecosystem.

After comparing the alternatives there really seems to be little difference in the care [illegible] of Alternatives 1 and 4. We do not agree with the selection of Alternative [illegible] as the preferred proposal and strongly recommend the adoption of Alternative 4 in its stead [illegible] reasons.

[illegible] is less complicated than the other three alternatives and would [illegible] existing practices thus simplifying implementation.

[illegible] Desired Condition Class areas in Alternative 4 than in the [illegible] means fewer ambiguous boundry lines, less confusion, and more continuity.

There is more Desidered Condition Class II space in Alternative 4. It is our [illegible] that Class II space, as defined in the DEIS, provides more users a "true wilderness experience" than any of the other classes. Within the context of wilderness and the purview of recorded time, there are few places, including the High Uintas, that are totally immune from human influence. Those of us who most often frequent the Class II areas defined in the DEIS know that they too provide outstanding opportunities for solitude and unconfined recreation and require a remarkable degree of self-reliance.

Alternative 4 calls for less Class III space. Some Class III areas have been so [illegible] no longer meet acceptable wilderness standards. We submit that these areas [illegible] administrative practices such as reduced public access and [illegible] Alternative 4 would seem to be the better plan for up [illegible] Class III areas.

[illegible] frequent the High Uintas [illegible] manage the Wilderness Area by the process of [illegible] the case. There is a better way. Education [illegible] success will be contingent on candid and legitimate [illegible] and complicated a plan becomes, the more susceptible it is [illegible]. If managers wish to avoid confusion, frustration, and [illegible] means to disseminate necessary information broadly and in [illegible] High Uintas Wilderness will not be well acquainted with the

topography. Unless properly educated they will be more vulnerable to confusion and subsequently to violations. We recommend the Forest Service, in conjunction with organized user groups, develop and implement an education program designed to teach all users the proper care and use of our wilderness.

If we, the Back Country Horsemen of Utah, can be of help in any way in promoting proper wilderness practices or in sustaining or improving our primitive back country, please feel free to contact me at (801) 782-4955.

Sincerely,

David P. Howells
President of the Board of Directors

cc: R-4 Regional Forester
Gayne Sears
Jane Hubbard
Myron Filkins, DVM
Sen. Robert Bennett
Sen. Orrin G. Hatch
Rep. Jim Hansen
Rep. Bill Orton
Rep. Enid Greene
All members of BCHU Board of Directors

MESSAGE DISPLAY FOR GAYNE SEARS

To: gayne

From: Julie Hubbard:R04F19A
Postmark: Aug 05,96 11:28 AM   Delivered: Aug 05,96 11:29 AM

Subject: Forwarded: Reply to: Comment on HUW DEIS

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Comments:
From: Julie Hubbard:R04F19A
Date: Aug 5,96 11:28 AM
FYI

Previous comments:
From: bert Kulesza:R04F01A
Date: Aug 02,96 5:00 PM
thanks julie. i got a call from jack prescott today too. he expressed similar concerns especial / the 7 horse limit in class 1 areas. said he/his group were putting together comments and would like to talk with bernie and me. said he would give me another call next week. will keep you in the looOp. bert

Message:
From: Julie Hubbard:R04F19A
Date: Aug 02,96 4:33 PM
Just received a call from Dave Howe, a Board member of Backcountry Horsemen group. At their monthly board meeting there were many very irate members who felt none of their concerns had been listened to during the TAC process. Jack Prescott was especially angry.. #1 concern was limit of 7 horses in a group in Class I areas. I explained this was a recommended group size, but he was still concerned. They are going to write a letter expressing these concerns but ex-forest supervisors on the Board told them those letters would get disregarded (trashed) and that they should get Senator Hatch involved instead. Dave was concerned because he felt that Horse guys had always had a great relationship with the USFS and that he wanted that relationship to continue. They are publishing open house locations in newsletter. I listened, encouraged him to comment, attend open houses, and promised to pass this note on to you bert and Bernie.

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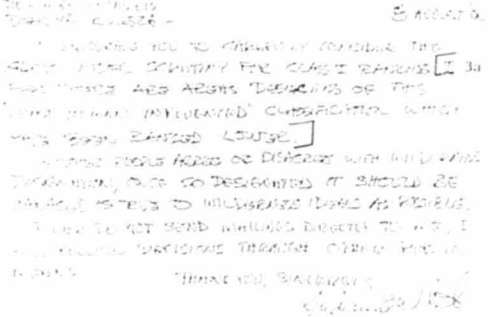
2a

(2a)According to the literature (Cole, 1989), popular guide books (Davis and Veranth, 1993) and Leave No Trace publications (Harmon, 1994), in more pristine areas large groups can cause greater resource impacts. The Class I desired condition description challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2 15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted.

Stock users who choose to travel in Class I must accept the responsibility to travel lightly and in small groups.

(Ja)Noted Refer to the Record of Decision for the rationale of the final decision



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Bert Kulzina, Forest Supervisor
Ashley National Forest
355 N. Vernal Ave
Vernal, Utah 84078

September 7,1996

Dear Mr. Kulzina:

Thank you for the Summary Draft of the Environmental Impact Statement on the High Uintas Wilderness Management Plan. Following a careful review of this document I would like to submit the following comments for your consideration:

1. Considering the existing budgetary constraints now facing the Forest Service, it appears to me that the proposed management plan is more complex than what can be realistically achieved with the existing manpower and finances that are likely to be available. If this evaluation proves to be correct it will not only result in frustration for those charged with administering the plan, but also the various user groups that will be expected to comply with its requirements. Such frustration will undoubtedly lead to unnecessary confusion and conflict not only between user groups, but also between users and Forest service personnel. Many users will have difficulty determining what condition Class zone they are in and will therefore result in innocent violations of the various rules and regulations pertaining to each area. Lets not make the plan so complex that it unnecessarily diminishes the opportunity for people to enjoy the wilderness experience, but wherever possible education should be the preferred method of managing use impacts. — 4a, 4b, 4c
2. Inasmuch as some Class III areas have been impacted to the point that they no longer meet an acceptable standard for wilderness, it would appear that these areas should be given high priority to bring them back to an acceptable standard through reduced use, improved administration and better education of the various user groups. Since Alternative 4 would provide management direction toward upgrading some of these Class III areas to Class II, I would recommend Alternative 4 be selected as the preferred alternative rather than Alternative 1. — 4d
3. Regardless of which alternative is selected, I believe a well designed and properly maintained trail system is an effective wilderness management tool. I have no problem with some areas being left as unmodified natural areas without developed trails for those who wish to have this form of wilderness experience, but in the case of the High Uintas such areas should probably not exceed 15 to 20 percent of the total area. Properly located and maintained trails often helps prevent resource damage and improves the opportunities for people to enjoy the wilderness. — 4e, 4f
4. Pack and saddle stock use has been a long established and accepted form of recreation in the High Uintas since long before the creation of the Wilderness Act. With proper management, the implementation of low impact camping techniques and a little common courtesy among all users, recreation stock use should not be any more damaging to the environment than any other class of users.

Thank you for the opportunity to comment on the DEIS and I trust that my views will be given consideration in the revision of the Wilderness Management Plan.

Sincerely,
Harold L. Edwards
Harold L. Edwards
Member BCHU

(4a)Complexity is inherent in ecosystem management. Budgetary constraints are a reality. Innovative means of accomplishing our tasks is essential. Writing proposals for grants and seeking partnerships with non-governmental organizations is essential to accomplishing the Forest Service mission. The development of well thought out management plans helps to focus the allocation of resources, i.e., the establishment of desired condition classes helps to serve that purpose. Monitoring of biological and sociological systems are complex and cannot be performed all at once. But, this plan establishes the frame work to direct efforts into the future and with the advent of modern technology the complexity is reduced to a manageable ecosystem portrayal of interrelated systems.

(4b)Most Class boundaries were drawn according to topographical features, and in relation to historical recreational use areas. As a result, the Forest Service does not expect that most visitors will need to be concerned with whether they have crossed a Class boundary and must now behave differently. In addition, some suggestions have been made to adjust the public wilderness maps to display the Classes in a visitor friendly way.

In addition, designation of classes is primarily used to focus management on popular areas while allowing allocation of resources to be applied as needed to maintain or monitor less popular areas.

(4c)Many options exist amongst the variety of management actions available. Actions need to be evaluated relative to other options for their ranking by the "minimum tool" concept, their cost, and the ability to be successfully implemented. The "minimum tool" concept implies that the minimum tool or management action chosen is appropriate and is only what is needed to protect the wilderness resource. Management actions run along a continuum from the benign, i.e., a sign, to law enforcement actions. This allows managers to use the "minimum tool concept" in choosing a course of action to address impacts. Enforcement through education is the preferred approach by the Forest Service.

(4d)In all alternatives, areas that are degraded beyond the intent of the Wilderness Acts will be targeted for rehabilitation.

(4e)We agree. But we also need the assistance of volunteers to help us achieve that goal.

(4f)The HUW is a large area and has many areas that have no trails and that topography prevents the construction of trails. Most trails have developed because they are the path of least resistance.

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[illegible]

[illegible] express my concerns about the Draft EIS [illegible] Wilderness. [The range needs to have the maximum amount [illegible] designated as Class I.] It is disturbing every time I go the Uintas to find [illegible] cow flops everywhere and streams turned into [illegible]. In addition the damage done by campers is appalling. [illegible] that hard by human caused intrusions is not acceptable. [[illegible] Alternative 3 is the best one. Preserving the wilderness [illegible] not maximizing commercial value by the [illegible] outfitters.] Grazing and how to control it needs to be [illegible] in the EIS. 5a 5b

[[illegible] species should not be introduced.] Bringing in new [illegible] cause problems and move the mountain range that much farther [illegible] natural state. Look at the problems caused by foreign plants [illegible] wheat grass, kudzu, tamarisk, foreign birds (starlings) and [illegible] lake trout in Yellowstone) to see just a few examples [illegible] gone seriously wrong. You cannot predict the [illegible] species may cause. The EIS ignores this issue. 5c

[[illegible] ungrazed land in the [illegible] managed for the [illegible] Colorado Cutthroat Trout Refuge. Grazing needs [illegible] to make sure that the big animals (ungulates) and their [illegible] habitat. And finally restrictions need to be placed [illegible] such as no fires and limited horse entry.] The Draft EIS [illegible] that the Uintas stay as wilderness for a long time [illegible]. 5d

[illegible]

(5a)Preference for Alternative 3 noted.

(5b)Preference for Alternative 3 noted.

(5c)The Forest Service favors indigenous species (species historically found in an area) first, and second, native species (species native to the United States over any exotic species (species not native to the United States). It is the States responsibility to make the determination as to which wildlife species are native or indigenous.

(5d)Response to the above is in 4 parts as follows: (1) Condition Class, (2) fish and wildlife management, (3) livestock grazing, and (4) restrictions on human activity such as no fires and limited horse entry.

<u>Part 1</u>: Condition Class. Some areas not grazed and not in Class I do not have Class I values for reasons other than grazing. Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways:

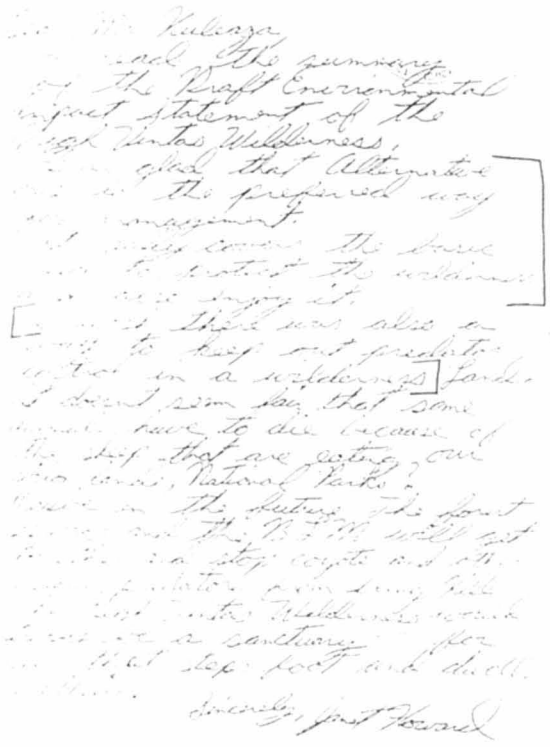
1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16 of the DEIS).
2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas.
3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed.

Important to this issue is the scale of soil and vegetation loss. Even in areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17.

<u>Part 2</u>: Fish and Wildlife Management. The Utah Wilderness act of 1984 states "nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the State of Utah with respect to wildlife and fish in the national forests in Utah". This wording is supported in the Wilderness Act of 1964. The State of Utah has clearly accepted responsibility for management of fish and wildlife. Management of fish and wildlife including actions such as a Colorado Cutthroat Trout Refuge requires agreements with UDWR as explained on page 1-12.

<u>Part 3</u>: Livestock Grazing. Congressional Grazing Guidelines for wilderness include "There shall be no curtailment of grazing in wilderness simply because an area is designated as wilderness, nor should wilderness designation be used as an excuse by administrators to slowly "phase out" grazing. For this and other mandates grazing issues are considered beyond the scope of this document.

<u>Part 4</u>: Restrictions on Human Activity. Implementation of desired conditions, indicators and standards (pg 2-2 through 2-17) addresses the need for restrictions on human activities (i.e. no campfires and limited grazing of pack stock) if native species begin to show a decline from the limit of acceptable change.



6a

6b

6a)Preference for Alternative 1 noted

(6b)Predator control by the Federal Government is authorized by the Predator Control Act of 1931, as amended. Predator control is administered by the Animal Damage Control office of the Department of Agriculture. Federal control officers spend very little of their time in the wilderness due to distances and cost effectiveness of their time. In general, they only go short distances into wilderness where a sheep allotment includes both wilderness and non wilderness lands. The number of coyotes taken within the wilderness is less than five per year. The Forest Service has designated that predator control within the wilderness is restricted to snares, traps, dogs, or shooting. Aerial gunning, M-44's, and "denning" are not allowed in wilderness.

MESSAGE DISPLAY FOR GAYNE SEARS

To: Gayne

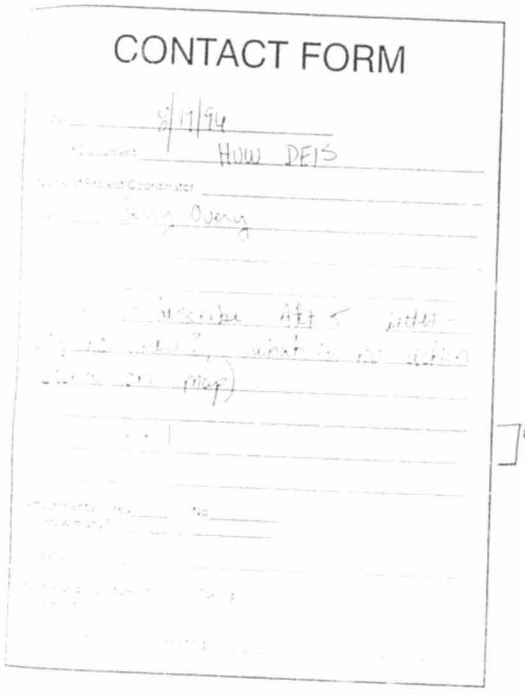
From: Julie Hubbard:R04F19A
Postmark: Aug 20,96 3:11 PM   Delivered: Aug 20,96 3:11 PM

Subject: For your records

Message:
I spoke with Jay Smith of Bountiful on 8/19/96 about the HUW DEIS. His biggest concern was sheep grazing in the wilderness and how he disliked it. I explained to him about class I zones being outside allotments. He still thought grazing was wrong. I told him that the grazing issue was not being addressed in the EIS but encouraged him to provide comments anyway. He was sent a summary. 7a

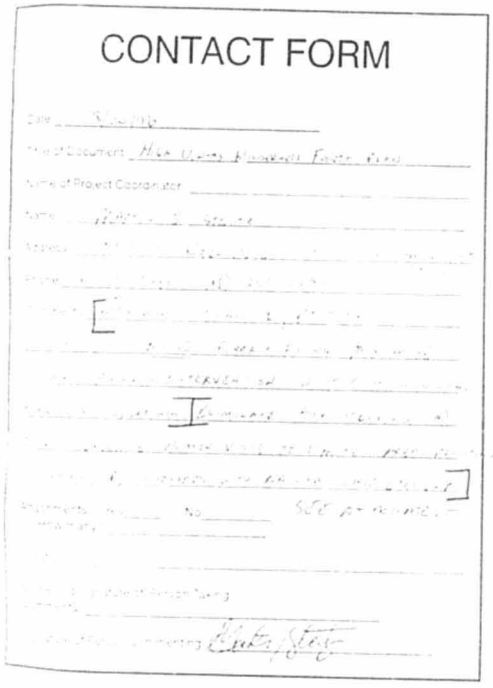
---------------X---------------

(7a)The presence of sheep in the wilderness is a concern and is objectionable to some wilderness users. Effects of sheep grazing to plants and soils is also a concern. However the Wilderness Act is clear that livestock grazing shall be permitted to continue in wilderness. Also Congressional Grazing Guidelines specifically state "there shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly 'phase out' grazing". The physical presence of sheep in wilderness is clearly within the Wilderness Act. The removal of sheep from wilderness based on wilderness designation is contrary to Congressional Grazing Guidelines. Specific soil, plant, water, and other resource values related to sheep grazing have and will be addressed in the NEPA process for specific allotments. Such site specific issues are more appropriately addressed at that level than in this programmatic EIS.



8a

(8a)Preference for Alternative 1 noted


CONTACT FORM

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(9a)Protection of biodiversity, native flora and fauna and minimizing human intervention are addressed in the concept of desired conditions.

Congressional Grazing Guidelines for wilderness include "There shall be no curtailment of grazing in wilderness simply because an area is designated as wilderness, nor should wilderness designation be used as an excuse by administrators to slowly "phase out" grazing. For this and other mandates grazing issues are considered beyond the scope of this document.

(9b)As Human induced degradation around lakes can be addressed through changing stocking locations or by regulating visitor traffic and use patterns. Standards defined in this decision, mark when conditions require management actions to stop degradation of soils and vegetation around lakes.

Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4.

B) The Wilderness Act of 1964, in Section 4 (d) (8), states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests." It is recognized that fish stocking invites excessive human use in some areas and that stocking can interfere with natural lake ecology (Holden, et al, 1996). For currently stocked lakes, these impacts to historic aquatic natural systems have already occured.

The State of Utah affirms that "we will be developing a memorandum of understanding (MOU) with the Forest Service describing standards for fisheries and habitat management for the HUW." (HUW DEIS letter # 40). In this light, the Forest Service will continue pursuing common ground in an MOU with the State to deal with the fish stocking issue.

CONTACT FORM

ATTACHMENT

Date [illegible]

Title of Document HIGH UINTAS WILDERNESS FOREST PLAN

Name of Project Coordinator

Name [illegible]

Address [illegible]

Phone

Comments [illegible]

Attachment? Yes ___ No ___

Location

Name and signature of Person Taking Comments

Signature of Person Commenting

9c

(9c)We recognize that to some people any human presence or trace in the wilderness seems unacceptable. Untrammeled by man is a phrase used in the Wilderness Act of 1964. The interpretation of untrammeled can be expected to be variable. Use of wilderness by the American people was included in the Wilderness Act of 1964 with direction that this use should be such that natural conditions are maintained. Also included in the definition of wilderness in the Act are areas that generally appear to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. The words "generally", "primarily", and "substantially" do not support a romantic or puristic view that any trace of human presence is unacceptable. The intent of the Act seems to allow use while maintaining inherent values.

Random sampling in the Wilderness seems to verify that primarily, generally, and substantially the wilderness is not being over used. The Shale Creek area of the Duchesne River Drainage offers a view of conditions where livestock have never been permitted and where human use has been very low. The Shale Creek Research Natural Area in the Uinta Drainage offers a view of conditions where few if any livestock have grazed and where human use has been very low. General comparison of vegetation and soil in these areas with other areas in the Wilderness shows very little obvious difference in plant composition, abundance, or vigor. There are areas of concentrated use, but from an overall ecological or watershed standpoint, overuse does not seem to be verified.

213 East Gordon Lane #30
Salt Lake City, Utah 84107

15 September, 1996

Bert Kuenzli, Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal, Utah 84078

COMMENTS ON *DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR MANAGEMENT OF THE HIGH UINTAS*

Mr. Kuenzli:

It has taken the Forest Service much too long to begin to address the problems of wilderness management in the High Uintas. A dozen years after passage of P.L. 98-428, the Utah Wilderness Act of 1984, and after much fruitless discussion, there is still no integrated wilderness management plan. The present document, which addresses the "limits of acceptable change" (LAC) zoning system and how it might be applied to the High Uintas Wilderness (HUW), does not amount to such a plan and cannot take the place of a plan. It provides an amendment to the vaguely worded Wasatch-Cache and Ashley forest plans.

10a

Within the limited context of the LAC decision, I support Alternative 3, the alternative submitted by the Utah Wilderness Association. This would put 40% of the HUW in Class I, 54% in Class II and 2% in Class III. The ungrazed portions of the wilderness would all be part of Class I, including Naturalist Basin, Grandaddy Basin, Four Lakes Basin, Squaw Hatchet Basin, Amethyst Basin, the Uinta River, the middle reaches of the Yellowstone River and part of Beaver Creek.

10b

10c

There are, however, broader issues that have not been addressed. As a guide, let me refer to *Wilderness Management* by John C. Hendee, George H. Stankey and Robert C. Lucas (second edition, revised). This standard work was written and published in cooperation with the Forest Service, and it is cited in the DEIS. Chapter 7 of the book sets forth 13 "principles of wilderness management." Amazingly, the DEIS ignores or violates every one of these principles!

(10a)We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(10b)Preference for Alternative 3 noted.

(10c)Areas not grazed and not in Class I do not have Class I values for reasons other than grazing. Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways:

1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16).

2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas.

3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed.

Important to this issue is the scale of soil and vegetation loss. Even in areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17.

(10d)At the time the Ashley and Wasatch Cache National Forest Plans were approved in the mid 1980s, most wilderness areas were managed primarily for the recreational benefits they might provide. While this is still a major focus for wilderness managers, it is now recognized that the sustenance of wild ecosystems for values other than those more directly related to human use should also be an important consideration. This analysis and the decisions that result, fulfill a need to articulate this shift in national policy for wilderness management in the High Uintas. Desired conditions described in the document determine appropriate human uses (as determined in the 1964 and 1984 Wilderness Acts) in order to maintain and suppport natural processes, natural appearance, and natural ecological role of fire.

(10e)This is an integrated plan. It establishes desired conditions, standards and criteria for evaluating and monitoring the entire spectrum of resources that make up the wilderness. It focuses on basic resources - vegetation, air quality, soils, wildlife and fisheries habitat parameters. It also sets indicators and standards for recreation use that is integrated with the basic resources.

The fact that the plan does not specifically address grazing, fish stocking, and animal damage control does not mean the plan lacks integration. All the basic resource indicators and standards are applicable to each of these uses. The reason we are not dealing with these specific issues relates directly to law. Grazing is allowed in wilderness and any adjustments to the grazing program must be made in a context other than wilderness (Grazing Guidelines). Therefore, this plan is not the proper place to discuss the grazing

Here is a critique of the DEIS according to these principles of wilderness management. Quotes in italics are from Chapter 7 of *Wilderness Management*

Principle 1: Manage wilderness as one extreme of the environmental modification spectrum.

"On this spectrum, wilderness is distinguished by its relatively undisturbed condition, naturalness, and solitude. Uses that alter these qualities reduce the range of environmental conditions available to meet public interests and desires. Wilderness simply cannot, and should not, meet all of the demands that might be placed on it."

The HUW is Utah's largest and most ecologically complex wilderness area. In the overall picture, it ought to be the very benchmark of wildness to which all other wilderness is compared. The DEIS treats it from a recreational standpoint and proposes no action to ensure the restoration of the degree of ecological integrity the public expects in the HUW. 10d

Principle 2: Manage wilderness as a composite resource, not as separate parts.

"For wilderness, one should not develop separate management plans for vegetation, wildlife, and recreation. Rather, one plan must deal simultaneously with the interrelationships between these and all other component parts of the resource."

The Forest Service has consistently refused to do an integrated plan which will address all management aspects of the HUW in one document. Instead, wilderness grazing allotments are considered in the AMP's and wildlife management is left to the Utah Division of Wildlife Resources and Animal Damage Control. 10e

Principle 3: Manage Wilderness and sites within, under a nondegradation concept.

"Basically, the nondegradation concept calls for the maintenance of existing environmental conditions if they equal or exceed minimum standards, and for the restoration of conditions which are below minimum levels."

The DEIS presents only the skimpiest analysis of present conditions in the HUW, even this focuses more on recreation use than ecological conditions. "Look at the range," the saying goes in range management, "not at the cow." Wilderness is no different. A real wilderness management plan would use LAC (which is supposed to describe desired future conditions) rather than extant conditions to target areas for restoration instead of to preserve the status quo, which the DEIS does not adequately describe anyway. 10f 10f

Grazing in the HUW should be phased out in order to restore indigenous wildlife. Fisheries management ought to aim at restoring original aquatic species wherever possible. 10g

program, other than to integrate it with the vegetation and soil standards. The allotment management plan is the proper context to address grazing issues.

The Wilderness Act is specific in that it does not alter in any way the authority of the Division of Wildlife Resources to manage wildlife populations. The management of wildlife populations to meet wildlife habitat desired conditions and standards must be a cooperative effort. Animal Damage Control (ADC) activities are the responsibility of the Animal and Plant Health Inspection Service (APHIS), again by law. Thus, we must work cooperatively with this agency to insure that wilderness values are protected when ADC activities take place.

(10f)The DEIS is not a site specific document. As stated on page S-1, the DEIS was developed to enhance programmatic direction for the High Uintas Wilderness. Desired conditions as given on pages S-11, S-12, and more specifically on pages 2-1, 2-3, and 2-4 give programmatic direction to manage the HUW such that it generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. It gives direction for management that will provide for opportunities for solitude or a primitive and unconfirmed type recreation. Under this direction, opportunities for solitude may not be equal across the wilderness, but the focus for management of large areas (Class I and Class II or 91% of the area) includes solitude.

The HUW management plan acknowledges the existence of areas where certain resource conditions have been degraded beyond the limits of acceptable change, and where ecosystem integrity may be threatened. These areas are referred to as "not meeting standards as defined by the 1964 and 1984 Wilderness Acts."

Although not specifically targeted within the plan, past monitoring efforts have clearly identified these areas as high priority for receiving restoration. Moreover, because the plan specifies acceptable standards for resource conditions for each class, areas where future monitoring detects unacceptable amounts of resource variation from the desired condition should automatically become priority areas for restoration.

(10g)Response. The wording "phased out" is in direct conflict with Congressional Grazing Guidelines which state "there shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly 'phase out' grazing."

(10h)Desired conditions as given on pages S-11, S-12, and more specifically on pages 2-1, 2-3, and 2-4 give programmatic direction to manage the HUW such that it generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Implementation of desired conditions as given in the document will address ecological impacts of recreation use and resource management activities.

The effects of recreation use and resource management activities on ecosystems and their component resources are addressed on the following pages: 4-2 through 4-4, pages 4-20 through 4-24, and pages 4-26 through 4-30.

Principle 4: Manage human influences, a key to wilderness protection.

Here again the DEIS falls far short of the needed wilderness management plan [Ecological impacts of recreation use and resource management activities are not addressed. The Forest Service abdicates its responsibility to place restrictions on existing overuse] 10h

In the book *Sagebrush Country*, published in 1989, Philip Fradkin wrote this description of the HUW:

"The Forest Service does not require wilderness permits, as it does elsewhere in areas of [illegible] heavy use. Nor does it ration use. Other Forest Service wilderness areas are [illegible] in order to provide the quality of experience that their nomenclature would lead the visitor to expect. A relative free-for-all exists in the Uintas because it is difficult to tell friends and neighbors that there is no more room in the inn."

[Improved recreation management is needed, starting with a rule prohibiting open fires at [illegible] areas. Restrictions ought to be placed on commercial outfitters and guides] 10i

[[illegible] considered in the analysis is the increasing use of snowmobiles [illegible] the HUW] This ought to be a high priority for change. 10j

Principle 5: Manage wilderness to produce human values and benefits.

The Wilderness Act provides for public enjoyment of wilderness and recognizes scientific and cultural values in addition to recreation. Wilderness managers must understand that "*it is from the primeval attributes of wilderness that human benefits are derived. [illegible] to facilitate wilderness enjoyment by improving access to make visitation easier [illegible] simultaneously accessible to an unacceptable number of people can [illegible] its unique benefits.*"

[[illegible] the unique benefits of wilderness as opposed to other backcountry [illegible] approach that goes beyond the recreation focus inherent in LAC [illegible]] Wilderness [illegible] must be the overriding values—if not in the HUW, then where? 10k

Principle 6: Favor wilderness-dependent activities.

"*Activities that are not wilderness dependent can be enjoyed in many alternative settings [illegible] wilderness dependent [illegible]. Thus, most conflicts should be resolved in favor of wilderness-dependent uses.*"

[[illegible] put and take fishing is not a wilderness dependent activity. It should be phased out [illegible] fishing for indigenous fish species] 10l

Regulatory restrictions are not the only practicable means of controlling overuse and dealing with its effects. There are many non regulatory management tools, such as user education and site rehabilitation, that can halt and even reverse the effects of overuse. These tools can be applied as both preventative and remedial mitigating measures. The plan does not abdicate the ability to place regulatory restrictions on recreation use, rather acknowledges that non regulatory measures are the preferred method of dealing with overuse.

(10i)The EIS proposes a firewood standard (pg 2-16) which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience. Utilizing a quantifiable method, campfires would be restricted and only stoves allowed when monitoring indicated a unacceptable adverse effect on visual/tree resources.

The HUW Forest Plan amendment directs future managers of this wilderness to address common problems in a common way. The indicators and standards (pgs 2-9 through 2-17) apply to both the outfitted and general public. When and if these standards are exceeded, management actions will apply to all human uses. For example, when and if a popular lakeshore trends toward or meets a standard for topsoil erosion from human use, all visitors to that lake will be restricted in some manner to improve resource conditions.

(10j)The 1964 Wilderness Act prohibits commercial enterprise (except for activities appropriate for recreation or other wilderness purposes), permanent or temporary roads, use of motor vehicles, motorized equipment or motorboats, landing of aircraft, other forms of mechanical transport, and structures or installation. Exceptions can be made for administration of the area when it meets minimum requirements and in emergencies involving the health and safety of persons within the area.

People using snowmobiles within the wilderness are doing so unlawfully and will be prosecuted when discovered.

(10k)We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations. Managing Wilderness is to prevent human induced changes from hindering the continuity of natural processes. As a result this management plan focuses on the effects of people on the wilderness resource.

(10l)Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4.

But, grow and take fishing is not a wilderness-dependent activity. The State is looking more strongly towards an indigenous fishery and will implement where feasible. The State of Utah affirms that "we will be developing a memorandum of understanding (MOU) with the Forest Service describing standards for fisheries and habitat management for the HUW." (HUW DEIS letter # 40). In this light the Forest Service will continue pursuing common ground in an MOU with the State to deal with the fish stocking issue.

Principle 7: Guide management with written plans that state objectives for specific areas.

LAC is valuable in this context. The LAC process is misapplied by the DEIS, however, as it is used to specify extant conditions instead of desired future conditions.

Principle 8: Set carrying capacities as necessary to prevent unnatural change.

"Applied to wilderness, the concept of carrying capacity has two important parameters (1) physical-biological and (2) social-psychological. The development of capacity limits is a necessary part of the planning process for those areas and locations where unacceptable change may occur. To achieve the long-term goals of wilderness preservation, time and space aspects of wilderness use must be managed to avoid unnatural changes."

The DEIS [illegible] address carrying capacity issues.

Principle 9: Focus management on threatened sites and damaging activities.

[The DEIS identifies threatened sites, such as areas of concentrated human use, but puts them in Class III as a way of avoiding the necessity of management action to solve problems of soil erosion and loss of vegetation.] 10m

Principle 10: Apply only the minimum regulations or tools necessary to achieve wilderness area objectives.

"The challenge of wilderness management lies in the developing, testing, and implementing of indirect controls ..." such as visitor education. [The DEIS has only the [illegible] discussion of regulations and visitor education activities, existing or proposed.] 10n

Principle 11: Involve the public as a key to acceptance and success of wilderness management.

[The Forest Service has been very disappointing in its public involvement.] In the Salt Lake City area, there have been just three public meetings in the last three years, all were perfunctory and not very informative. Agency representatives only wanted to discuss the LAC concept and dismissed questions about specific management concerns such as grazing and stocking of non-native wildlife in the HUW. [The public was given the clear impression that the Forest Service was wrapped up in a bureaucratic exercise and was not in "listening mode."] 10o 10p

"Clearly, any proposed wilderness management action needs public involvement as a source of wisdom and essential public support, without which its implementation will fail."

(10m) It is important to note that while Class III standards allow for some change in resource conditions, soil erosion will not become detectable within the larger watershed nor will vegetative losses be significant to the integrity of the ecosystem that they occur in.

For example, the soil quality standards on page 2-11 allow for various amounts of ground and vegetation disturbance at areas of concentrated use, depending upon the condition class designation. However there is no tolerance for conditions to occur that are indicative of permanent resource damage, or that violate State of Utah or Federal soil and water quality standards, regardless of condition class designation. Furthermore, page 2-10 shows standards for the protection of water quality that are essentially the same for all condition class designations.

Within the soil and water quality standards, specific management actions are in place that will prevent soil erosion and vegetation loss from becoming a problem in the High Uinta Wilderness. These actions rely heavily upon monitoring of the extent of disturbance so that conditions that are a precursor of permanent resource damage can be detected well before they become a problem. In addition, monitoring of erosion control practices at existing problem areas will also occur. This will ensure that actions taken are effective in correcting resource degradation problems.

Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways:

1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16 of the DEIS).

2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas.

3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed.

Important to this issue is the scale of soil and vegetation loss. Even in areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable. Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17. These standards provide (not avoids) direction for necessary management action.

(10n) Many options exist amongst the variety of management actions available. Actions need to be evaluated relative to other options for their ranking by the "minimum tool" concept, their cost, and the ability to be successfully implemented. The "minimum tool" concept implies that the minimum tool or management action chosen is appropriate and is only what is needed to protect the wilderness resource. Management actions run along a continuum from the benign, i.e., a sign, to law enforcement actions. This allows managers to use the "minimum tool concept" in choosing a course of action to address impacts. Enforcement through education is the preferred approach by the Forest Service.

[illegible] stand now, the Forest Service is not open to meaningful and effective public [illegible]. The impression I have is that the agency tries to manipulate the public

Principle 12. Monitor wilderness conditions and experience opportunities as a key to long-term wilderness management.

[The DEIS presents only a table with the barest information about monitoring plans, sometimes just the words "field observation and incident report analysis." This is inadequate to assure nondegradation of wilderness values in the HUW] 10q

Principle 13. Manage wilderness in coordination with management of adjacent lands.

[illegible] management policies of the Ashley and Wasatch-Cache have been [illegible] by massive over-harvesting and invasion of roadless land. Since 1983 [illegible] acres have been lost to the timber program in the Uintas. The Forest Service [illegible] contemplated clear cutting next to the wilderness boundary in the [illegible] timber sale and most recently in the Round Park Lost Creek [illegible] process. The Wasatch-Cache has actively promoted a road [illegible] up the Main Fork almost to the wilderness boundary [illegible] this drainage to future timber sales.

[illegible] wilderness does not exist in a vacuum—what goes on outside of the [illegible] wilderness can have substantial imp[illegible] as inside its boundary. Managers [illegible] various forest resources should carefully define activities that are compatible with wilderness and take steps to keep incompatibilities to a minimum.

Conclusion

[The High Uintas Wilderness still needs an integrated management plan, which seeks to address issues the DEIS dismisses as "outside the scope of this document." The Forest Service should use established guidelines in formulating a plan] 10r

[illegible]

[illegible]

[illegible] M. Warnick

The EIS is not the proper vehicle for developing individual management actions. Management actions have to be decided on a case by case basis. Each drainage has has management concerns that need to be addressed individually. Some flexibility in choosing management actions need to be available to the wilderness managers.

(10o)Efforts made to include the public in this decision making process include, in addition to the public involvement described on page 1-5:

- there were at least 6 public meetings,
- numerous radio and newspaper reports and,
- presentations at interest group organization meetings.

(10p)Early in this planning process Forest Supervisors Susan Giannettino and Duane Tucker decided to limit the scope of the wilderness planning project. The topics you mention (grazing and stocking of non native wildlife) were eliminated from further analysis because there were other processes to address these issues. Unfortunately, you and many others have determined this limit of scope resulted in Forest Service decision makers not listening to concerns. The discussion on pages 1-11 and 12 illuminate these concerns in more detail.

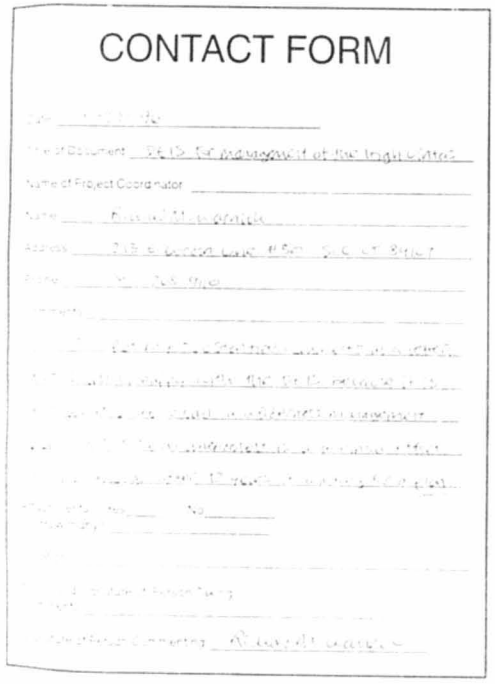
(10q)We believe the monitoring plan is adequate to protect the wilderness resource. The monitoring plan must give solid direction on what to monitor and when, but it must also be flexible enough to account for changes in available budget, personnel and time. Each season is different and accomplishment will vary year to year. We are dedicated to the task of monitoring the standards often enough to insure the standards are being met, and, if not, to provide adequate data to support project level decisions on corrective actions.

(10r) This is an integrated plan. It establishes desired conditions, standards and criteria for evaluating and monitoring the entire spectrum of resources that make up the wilderness. It focuses on basic resources - vegetation, air quality, soils, wildlife and fisheries habitat parameters. It also sets indicators and standards for recreation use that is integrated with the basic resources.

The fact that the plan does not specifically address grazing, fish stocking, and animal damage control does not mean the plan lacks integration. All the basic resource indicators and standards are applicable to each of these uses. The reason we are not dealing with these specific issues relates directly to law. Grazing is allowed in wilderness and any adjustments to the grazing program must be made in a context other than wilderness (Grazing Guidelines). Therefore, this plan is not the proper place to discuss the grazing program, other than to integrate it with the vegetation and soil standards. The allotment management plan is the proper context to address grazing issues.

The Wilderness Act is specific in that it does not alter in any way the authority of the Division of Wildlife Resources to manage wildlife populations. The management of wildlife populations to meet wildlife habitat desired conditions and standards must be a cooperative effort. Animal Damage Control (ADC) activities are the responsibility of the Animal and Plant Health Inspection Service (APHIS), again by law. Thus, we must work cooperatively with this agency to insure that wilderness values are protected when ADC activities take place.

CONTACT FORM



Aug. 21, 1996

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 N. Vernal Ave.
Vernal, UT 84078

Dear Bert,

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR MANAGEMENT OF THE HIGH UINTAS WILDERNESS.

Class I & II Areas

I have included a map showing a change in the Preferred Alternative Class I & II Areas. Knowing the environmental community, they are not going to be satisfied with only 23% of the land base in Class I. [I also feel that there is an opportunity to increase the amount of Class I area and have a well balanced management plan.] 11a

Proposal would eliminate potential problems with fish stocking and Class I areas could still be defined as "Lakes are generally not stocked with fish."

[Proposal would include more livestock grazing lands within Class I areas. Livestock interests could have their concerns addressed by additional language being placed within the document.] Those using these areas could move just a small distantance if they encountered livestock and still have their desired solitude. 11a

Whatever map is produced in the final EIS should be a working map for management decisions and not be a common map handed out to the public.

[Once the FEIS has been completed a new map needs to be produced for the general public.] Shading or some other tool could be used to show high use, moderate use and low use which would coincide with Classes. This would allow users to plan their trip to fit their needs. 11b

SIZE OF GROUPS IN CLASS I AREAS

[The size of groups using Class I areas should be the same as Class II & III areas for the general public.] Enforcement of a different size would be difficult at best and would be an additional burden on the public. The present proposal would only add to the heavier use of presently heavy used 11c

(11a) Noted. Refer to the Record of Decision for the rationale of the final decision.

(11b)Producing a new map to enhance visitors' understanding of expectations is an excellent idea as part of an overall wilderness education program for the HUW.

(11c)At this time, no regulation for a group size less than 14/15 is in place. However the desired condition description for Class I challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted. Presently, 20-30% of the visitors to the HUW travel in groups more than 7. To mitigate confusion, managers will target larger groups for extra education efforts, but it is the responsibility of the visitor to understand and follow leave no trace techniques especially while traveling in pristine areas. According to the literature (Cole, 1989), popular guide books (Davis and Veraguth, 1993) and Leave No Trace publications (Harmon 1994), in more pristine areas large groups can cause greater resource impacts. The Class I desired condition description challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted.

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areas. From my personal experience, it could create un-needed problems. Whenever I have taken groups of young people into the high country, I have stayed away from areas with a lot of people for several reasons. There are also times when the general public (group larger than 7) also want solitude.

CONSISTENT USE OF TERMS

Example page 1-8, issue 7. In one paragraph the term "fish and wildlife" is used and in the next only "wildlife". In both cases they are referring to fish and wildlife species. 11d

SPECIES IN WILDERNESS 11d

Page 1-12. Other cutthroat have been stocked and presently inhabitant waters within the wilderness. They may not be the preferred specie, but they are there.

ERROR

Page 2-2 in discussion of alternatives generated. There are two alternative 3s and no alternative 2. 11e

NIGHTS AT ONE CAMPSITE

Pages 2-16 and 2-21. In a wilderness setting, 14 days in the same campsite is to long. I suggest this be changed to no more than seven (7) days within Class II & III areas. People camping in the same site for long periods of time do not allow an area to heal and creates congestion during periods of high use. Less time at the same site would also provide more use by more users in a highly desired area. 11f

Thank you of allowing me to comment on the document. In general, I think it is a good document.

Sincerely,

Albert W. Collotzi

Albert W. Collotzi
Rt 1 Box 1597
Roosevelt, UT 84066
801-722-0263

(11d)Typo is corrected

(11e)Typo is corrected

(11f)Human induced change to the landscape depends on many factors. In some vegetation types length of stay can cause damage to vegetation. If however, a site is chosen well and camped on lightly, resource conditions are not likely to show deterioration. Indicators and standards as listed on pages 2-11 through 2-17 address activities and conditions associated with campsites. Application of these standards are expected to prevent human induced changes to the resources.

Dana Landale
5312 WoodenShoe Road
Peoa, Utah 84061
801 783 5788

Bert Kulesza, Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, Utah 84078

Dear Mr. Kulesza,

As an avid horsewoman and a member of High Uinta Back Country Horsemen, I would like to make a few comments regarding the Management of the High Uintas Wilderness.

Regulations as to the number of stock allowed per group travelling into the wilderness must be kept consistent, as a group may travel from an area of one classification into an area classified otherwise. 12a

My main concern is how the various classifications will be managed. It is apparent that the Forest Service is already short on funds, and consequently, labor. It is inconceivable to me that frequently used trails and trailheads be left in disrepair while personnel is sent to the Wilderness to enforce management regulations. 12b

I hope you will consider the needs and desires of horsemen as well as hikers as you make decisions concerning the High Uintas Wilderness Management.

Thank you.

Sincerely,

Dana Landale

(12a)At this time, no regulation for a group size less than 14/15 is in place. However, the desired condition description for Class I challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted. Stock users who choose to travel in Class I accept the responsibility to travel lightly and in small groups.

(12b)Establishment of the desired condition classes will assist in the allocation of ...ote resources. Trailheads and trails will still receive the attention that they have in the past, providing that funding is not cut heavily in the future. Dependency on volunteer groups to do trail maintenance and proposal writing to fund major trail projects is already a reality. If more groups or individuals would volunteer, this would increase our ability to maintain the trails. The imposition of better management is not going to divert resources from trails to monitoring ...egulations to enforce have not increased nor has the responsibility to enforce regulations changed. We have always been short handed in our ability to regulate. The desired future classes will help to focus resources where they are needed.

(13a)Preference for Alternative 3 noted

TO Bert Kulesza
Forest Supervisor
[illegible] National Forest
[illegible] N Vernal Ave
Vernal, Ut 84078

Subject: The Summary of the Draft
Environmental Impact Statement

[illegible] Bert Kulesza,

[illegible] read the summary [illegible] [illegible] agree that alternative number [illegible] 13a [illegible] good [illegible] [illegible] Wilderness area, but [illegible] number 3 would do [illegible] preserving the High [illegible] [illegible] for giving me [illegible] voice in how the [illegible] managed

[illegible]

[illegible], I am just concerned [illegible] awesome place in Utah [illegible] please send me information [illegible] issue I would

opportunity. Thank you for your time

Sincerly
Vance Parry
1130 E Viewpoint Dr Apt G307
Sandy, UT 84094

August 28, 1996

Bert Kuleza
forest supervisor
Ashley National forest
355 N. Vernal Ave.
Vernal, Utah 84078

This august my family hiked on the Highline Trail on a Monday morning and in 90 minutes we passed 98 people. This was more people than on many Salt Lake City streets. My friends hiked into the Uintas one quiet Tuesday evening and the next morning found themselves surrounded by a boy scout village.

Even if I was limited in my access to some of the wilderness trails, I strongly believe we need more management. I would not be opposed to making reservations and paying a fee, if I could have more of a wilderness experience. Therefore, I strongly support Alternative 3. I want to maximize the pristine character of the wilderness. 14a

I would like to see increased Class I areas and decreased Class II and III areas. I would welcome increased regulation. 14b

Sincerely
Joleen Bell
2379 East 900 South
SLC Utah 84108

(14a)Preference for Alternative 3 noted.

(14b)Present regulations seem to be sufficient. Using the "minimum tool rule", regulations are added only when education and ethics have failed to protect the resource. Ability to enforce a regulation is essential and is certainly affected by reduced budgets. Greater effort has been put into writing grant proposals that will increase wilderness education in local school systems in the Uinta Basin.

655 Canyon Road
Logan, UT 84321
August 27, 1996

[illegible] Fulenza, Forest Supervisor
Ashley N.F.
[illegible] N. Vernal Ave.
Vernal, UT [illegible]

Dear [illegible]:

I write to respond to the High Uintas Management Plan. In particular, I recommend that "Alternative 3," submitted earlier by the Utah Wilderness Association, be considered and accepted. 15a

Any presently ungrazed area should automatically be considered Class I, in fact. I would recommend active restoration to re-create "Class I" areas across the entire range. The High Uintas are a national treasure. 15b

Grazing simply must be phased out, as soon as possible. Grazing is the single most damaging use of the range. (I can and do tell horror stories of beautiful areas like Henrys Fork Basin, trampled to dust by thousands of sheep.) 15c

Grazing should be phased out, and very strict no-trace camping rules should be enforced, range-wide. The Forest Service has got to become an educational institution, sooner or later, as the human population grows and pressure on the land increases. There is no alternative. 15e

Please make preservation and restoration the highest priority on the High Uintas Wilderness. The traditional uses of the Uintas by graziers, Boy Scouts (with their incredibly ugly fire rings and their stripping of all dead and down wood for their bonfires), and large pack trains, all have to be phased out. The main thing is the resource! When it is degraded, we all suffer. Protect and restore the resource -- don't just piddle around trying to accommodate this or that traditional user group.

Thank you for your consideration.

[illegible],

Thomas J. Lyon
Thomas J. Lyon

(15a)Preference for Alternative 3 noted

(15b)Some areas not grazed and not in Class I do not have Class I values for reasons other than grazing. Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways: 1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16). 2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas. 3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed. Important to this issue is the scale of soil and vegetation loss. Even in areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17.

(15c)The wording "phased out" is in direct conflict with Congressional Grazing Guidelines which state "there shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly 'phase out' grazing."

(15d)mistake in numbering

(15e)Education is essential to building future wilderness constituents and more sensitive users. Many educational efforts are in process and more needs to be done. Unfortunately, budget restraints prohibit dedicating full time personnel to developing, implementing, and managing education programs. This does not preclude writing grant proposals to fund environmental education programs or giving support to local school districts.

Bert Kulesza-Forest Supervi:
Ashley National Forest
*55 N. Vernal Ave.
ernal, UT 84078

TREAD LIGHTLY!

Dear Mr. Kulesza:

I do not favor the idea of breaking any public land into classes because of the obvious increase in cost and complexity to administrate and educate all involved. There is bound to be more user conflict because most users will not know the class boundaries and regulations for each class area, thus violating your proposed regulations. 16a

It has been my observation while traveling through most of the High Uintas that the outer fringe of the primitive area is obviously in need of some type of control. This fringe area is where I have seen the most damage. It extends about eight miles in, and therefore your proposed plan is probably the best solution because it can allow the control of these fringe and other high pressured areas while still allowing absolute access to users that enjoy the challenge of traveling deep into the interior of the High Uinta wilderness. 16b

I would like to suggest that Class I needs a larger group size and overnight stays increased. Such values will tend to put more pressure on classes II and III when groups are larger or wish to [illegible]nger than your proposed limits. Group size is particularly a problem because it was not [illegible] ago that the Ashley and Wasatch/Cache forests adopted the Special Order 36 CFR 261.58 [illegible] to Standardize the maximum group size between the two forests. I personally would never enter the primitive area with a group larger than seven, but there are groups and organizations that have the need for larger numbers, a good example of this would be our scouting organizations. This is where education becomes our most important and pro-active solution to the damage we see in our wilderness. Using the scouts as an example, these are our future minds and at this time I feel education instead of restriction would be the best alternative. Because of your recent adoption of the above mentioned Special Order, I feel the group size should stay the same as is called out in the above Special Order. This would help reduce user conflict, considering such a large change in the way our forest will be administrated in your plan. 16c 16d

As I stated at the beginning of this letter I would prefer no classes like Alternative 5, but considering the need for change, I will vote to adopt **Alternative 4**. 16e

Sincerely,

[signature]

Chris Cummings-(801) 254-7634
1059 West Shields Ln. So.Jordan, Ut. 84095

(16a) Complexity is inherent in ecosystem management. Budgetary constraints are a reality. Innovative means of accomplishing our tasks is essential. Writing proposals for grants and seeking partnerships with non governmental organizations is essential to accomplishing the Forest Service mission. The development of well thought out management plans helps to focus the allocation of resources, i.e. the establishment of desired condition classes helps to serve that purpose. Monitoring of biological and sociological systems are complex and cannot be performed all at once. But, the preferred alternative establishes the frame work to direct efforts into the future. Most Class boundaries were drawn according to topographical features and in relation to historical recreational use areas. As a result, the Forest Service does not expect that most visitors will need to be concerned with whether they have crossed a Class boundary and must now behave differently. In addition, some suggestions have been made to adjust the public wilderness maps to display the Classes in a visitor friendly way. In addition, designation of classes is primarily used to focus management on popular areas while allowing allocation of resources to be applied as needed to maintain or monitor less popular areas.

(16b) Preference for Alternative [illegible]

(16c) [illegible]

(16d) [illegible]

(16e) [illegible]

ACTIVITIES

Pole Creek...

as well as scene, you can also take a half-day or so hike to Clover Point on Sunday. Call Brent Hansen at 789-8968 to find out where and when to meet, etc.

Salmon Day

Saturday, September 21

Salmon! Glorious vaulter of thundering cascades, favorite food of Alaskan brown bears and notorious Idaho Congresswomen, heroic migrant of Sheep Creek. Yes, Virginia, there are salmon runs in Utah. Kokanee salmon inhabit various inland lakes and reservoirs, including Flaming Gorge. Their Sheep Creek spawning run may not rival the epic journeys of their oceangoing cousins, but it's colorful and easily accessible right off U-44.

The Utah Division of Wildlife Resources will have biologists at Sheep Creek from 9:00 a.m. to 4:00 p.m. to talk about salmon lore and research (similar events will be going on at Strawberry Reservoir, in case you happen to be heading west that day). More information is available from DWR, 789-3103.

If you'd like to visit Sheep Creek as part of a Mountain Club group, call Linda West, 789-4313. [illegible]

Ruby-Horsethief Float

Friday-Sunday, Sept. 27-29

Have you about had it with this hot, dry summer? Are you weary of those macho-river-stud whitewater trips? Well, here's the cure: a relaxing, refreshing canoe trip through Horsethief and Ruby canyons on the Colorado River. This is the stretch from Loma to Westwater, with slickrock sandstone cliffs punctuated by somber Precambrian gneiss at Black Rocks, producing some modest riffles in otherwise calm water. Sound appealing? Call Brent Hansen, 789-8968, if so.

Calling all Bicyclists!

There's a group of folks around Vernal who gather regularly for bike rides, and they invite anyone to join them. Here's the scoop:

MOUNTAIN BIKES

Wednesdays . . . Fridays, 6:00 p.m. Leave from Altitude Cycle, 510 East Main (781-2595). Distance and route vary with whatever group turns out; novices are welcome.

ROAD BIKES

Every Saturday, 12 noon; also some Sundays, and most evenings at 6:30 p.m. Leave from front of Vernal Tabernacle. Novices welcome, though may soon be outpaced (but if enough show up, all levels should at least have someone to ride with). Call Craig Merrell, [illegible]-6745, for more information.

Time for Another Gear Swap?

As you probably recall, we had a Club garage sale just a couple months ago, and last November we had a sports-and-outdoor-gear swap meet. And where was our dauntless UMC president then? (Well, floating the Salmon or something dumb like that this year, and last year she wasn't yet prez.) But since then, Marty Fallon has inventoried her basement and found all kinds of surplus skis, boots, camp stoves, etc. She'd like to unload them and wonders if any other members need to acquire or dispose of such stuff. To talk swap, call Marty at 789-4519 (home) or 78[illegible]-0878 (work).

NEWS & VIEWS

High Uintas Wilderness Letters Needed

At the same time that we have been working so hard to get federal wilderness protection for BLM lands in Utah, it seems our already designated Forest Service wilderness lands have been threatened. I refer to the High Uintas Wilderness. A High Uintas Wilderness Management Plan has been proposed that offers far from ideal protection for this wonderful high country.

The U.S. Forest Service is advocating its Alternative 1 in their draft EIS. This calls for a mere 23% of the High Uintas Wilderness Area to be managed as true wilderness. This is known as Class I wilderness, where human influence is at a minimum, ecological processes operate without human impact, grazing is banned, and lakes cannot be stocked with non-native fish. Alternative 1 would manage 68% of the High Uintas Wilderness Area as Class II lands, allowing fish stocking and grazing, and human impacts of the kind judged temporary and from which nature can recover. The last 9% of the High Uintas would be managed as Class III, where human impact is substantial and chances for solitude and primitive recreation are limited by the heavy human use of the areas. Grazing and fish stocking are allowed in Class III areas.

The former Utah Wilderness Association proposed an "ecologically based alternative," known as Alternative 3 in the Forest Service draft EIS. This proposal designates 40[illegible] of the High Uintas Wilderness as

continued on page 4

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NEWS & VIEWS

igh Uintas...

Class I management lands, 58% as Class II, and 2% as Class III. As such the High Uintas would have their wilderness characteristics better protected and preserved. The major difference in Alternative 3 is that it suggests all ungrazed portions of the High Uintas be Class I management areas. This would include places such as Grandaddy Basin, the Uinta River, Naturalist Basin, Amethyst Basin and parts of the Yellowstone River.

Other issues that need to be addressed are fish stocking, campfires and grazing. I personally advocate that we take a strong stand against the stocking of non-native fish in most wilderness areas. Introduced fish (of any other species) always create problems for the existing native and the balance of the ecosystem. The Russian olives introduced into the Uinta Basin as "prairie" feed are an excellent example of the headaches that often result.

Campfires too need some critical consideration. Just one campfire is no big problem, but today we have thousands of people using the High Uintas. The hundreds of campfires built by these visitors are a major problem. Campfires are not a natural part of a true wilderness. Backpackers should use camp stoves for cooking. Horse campers should use stoves or at the very least fire pans (I know a Mountain Club member who makes and sells fire pans for horse, river and car camping, if you want one of your own). Campfires are a holdover from the days of high-impact camping; the Mountain Club should always encourage true low-impact camping.

Grazing is a sensitive issue, but a primary purpose of a wilderness area is to provide habitat for native species. When grazing conflicts with native species, it must be restricted or the very purpose of the wilderness has been compromised.

YOU NEED TO GET INVOLVED:

Write to Bert Kulesza, Forest Supervisor, Ashley National Forest, 355 N. Vernal Ave., Vernal, UT 84078. He must receive your letter before September 17th! Stress your support for wilderness management that provides maximum protection and preservation of the High Uintas. Express support for Alternative 3 of the High Uintas Draft EIS. Ask for Class I management areas to include all ungrazed portions of the Uintas. Oppose stocking of non-native fish in wilderness areas. Support campfire restrictions and use of backpacking stoves. Support the High Uintas as a habitat for bighorn sheep and other native species. Let wilderness preservation be the primary goal of any management plan; other uses must be secondary and consistent with the prime goal of wilderness.

For more information contact the Mountain Club's Natural Resources Committee.

—Stephen Borton

Environmentalists in Unlikely Places

You'd expect to see the following sentiments in *this* rag, but in *Chamber Spirit*, the newsletter of the Vernal Area Chamber of Commerce? Thanks, Rita, not only for permission to reprint your article, but for expressing your views so boldly and eloquently in the first place.

Point of View

Is there a place in the Vernal Area Chamber of Commerce for differences of fundamental beliefs and opinions?

I think so.

There are some among us who are known as environmentalists. I am one of them. We sometimes look at things in a different way from some other folks. We might see forests as an important part of a complex system critical to our world, which need to be managed wisely and carefully. To others the forest might be primarily a source of building materials for homes. We live in houses too, so we understand that need.

When we think of endangered things, we think of species unique in our ecosystem that are in danger of not being able to survive. Others may see them as an obstacle to needed water projects. We use water too, so we understand that need.

There is a balance. It is a balance of education, understanding, conservation, preservation, probably compromise, and above all respect for one another's beliefs.

Most of us have our time in the sun – when we walk the roadless areas, float the rivers, and climb the mountains. When that time in our lives is past, the legacy that we can leave to those who come after us is the same opportunity and choice. I hope that we all respect and cherish the land so that this heritage can endure.

So if you see me out hugging trees, stop and visit; we may both learn something.

—Rita Wetenkamp

Another place where I was pleasantly surprised to find some modestly environmental views was at a recent meeting to organize a Vernal area garden club. Just about everyone seemed to be interested in composting, nontoxic pest controls, efficient water use, and so on. The group will meet again Wednesday, October 2, 7:00 p.m., probably in the County building. Drop in and see for yourself that there's more than one shade of green!

—Linda West

(17a)Preference for Alternative 3 noted.

(17b)Some areas not grazed and not in Class I do not have Class I values for reasons other than grazing. Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways: 1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16). 2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas. 3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed. Important to this issue is the scale of soil and vegetation loss. Even in areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17.

17a

17b

17c

17d

(17c)Comments from the public and discussions at IDT team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4. The State of Utah affirms that "we will be developing a memorandum of understanding (MOU) with the Forest Service describing standards for fisheries and habitat management for the HUW." (HUW DEIS letter # 40). In this light the Forest Service will continue pursuing common ground in an MOU with the State to deal with the fish stocking issue. The State is looking more strongly at an indigenous fishery and will implement where feasible.

17e

17f

(17d)The EIS proposes a firewood standard (pg 2-16) which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience. Utilizing a quantifiable method, campfires would be restricted and only stoves allowed when monitoring indicated a unacceptable adverse effect on visual/tree resources.

(17e)The Forest Service does support the High Uintas as habitat for indigenous species and will work with the Utah Division of Wildlife Resources in recommendations they make for reintroductions and supplemental transplants.

(17f)Desired conditions described in the document determine appropriate human uses (as determined in the 1964 and 1984 Wilderness Acts) in order to maintain and support natural processes, natural appearance, and natural ecological role of fire.

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CONTACT FORM

Date ____________

[illegible] Document: HUW DEIS

[illegible] of Project Coordinator: [illegible]

Name: [illegible]

Address: ____________

____

[illegible] III [illegible] 18a

____

[illegible] 18b

____

[illegible] (guiding?)

[illegible] more [illegible]

Attachments: Yes ____ No ____

How many? ____________

[illegible] ____________

Title and signature of Person Taking Comments ____________

Signature of Person Commenting ____________

(18a)After reviewing comments on the DEIS, we have added Class III areas as generally appropriate for outfitted activities also. Due to existing high use and social conditions on the verge of exceeding standards, specific areas in Class III (identified in the chart on page 2-18) will remain closed (no permits issued) to outfitting. On a broad scale, if managers ever impose a quota on the number of visitors to the HUW, both the outfitted and non-outfitted public will share the encumbrance.

(18b)The outfitting and guiding criteria (pg 2-2) have been revised to reflect an opportunity for service days to either increase or decrease (within the service day ceiling).

...ial prioritizes

7 road projects

...

Outfitter fears definition of wilderness excludes horses

As outfitter in Uintah County, I believe that if alternatives in the Draft Environmental Impact Statement for the Management of the High Uintas Wilderness are adopted, guided horse trips will be drastically cut.

"The Draft Forest Document appears that Outfitters must sacrifice their use of wilderness because human use has threatened the integrity of ecosystem components of designated potential for reintroduction of endangered species," said Joe Jessop, JS Ranch in Whiterocks.

The recommendations are in the Forest Service manual which describes an outfitter as being needed by the Forest Service to assist in managing and protecting the wilderness resource and to provide for the well-being of visitors to the wilderness.

The DEIS proposes four alternatives to amend the Ashley and Wasatch-Cache National Forest to include mapped conditions classes with accompanying indicators and standards for High Uinta Wilderness.

The proposed action provides "desired conditions" states for three classes of wilderness areas in the High Uintas Wilderness. The proposed action allocates certain areas of the High Uintas to these three desired condition classes, so that 23 percent of the wilderness is in Class I, 66 percent is in Class II and 9 percent is in Class III. Class I management as human influence is not evident. Class II is moderate human influence. Class III is more human influence within the context of wilderness. Grazing of livestock and foot trucking can occur in class es II and III.

"Over 70 percent use of pack trip clientele is over 60 years of age and have some kind of physical disability," said Jessop. "We are the only means of conveyance for this very group. Outfitters represent only about 1 percent of the total use of wilderness. We offer our services to pack out other people's trash. Every year, thousands of pounds of trash and waste is removed from people who operated on the use and other enterprises."

The public hearing on the DEIS are over but the 90-day public comment period will not end until Sept. 17. Comments should be forwarded to Bert Kestler, Ashley National Forest, 355 N. Vernal Ave. Vernal.

Jessop contends that the DEIS contains outdated and misleading economic indicators. It states that wilderness outfitter are economically insignificant to the local and state economies.

"Four of the submitted alternative in the DEIS will cripple the economic viability of the business," Jessop said.

Jessop is meeting with Forest Officials this week to state his concerns.

Forest service to explain entrance fee

Questions about the implementation of entrance fees at Flaming Gorge National Recreation Area will be answered during the Sept. 16 meeting at Western Park.

Recreationists, boaters, resource users and wreckers are considering if they will be charged to use the Flaming Gorge National Recreation Area as fees go on the past.

The Flaming Gorge National Recreation Area has been selected to implement an increase for use of local lakes. This implementation will be of some benefit to the area as 80 percent of the monies collected will stay in the Ashley Nevada. Forest to repair were facilities.

There will not be increase in ...ees for the motorized area, but ...raised in area pass sold through a network of vendors. The pass will provide the visitors an opportunity to use facilities at Flaming Gorge. There will be daily, seven day, annual and senior passes.

The meeting Monday will be in ...session prepared to area and ask for public input. If you want to ...to speak at the meeting be a Western Park at 7 p.m.

ople of the West' seeks balance

...

...down a coal mine in Utah it affects ...ax reduction, highways, power ...ments and job opportunities."

Much of what "People For the West" does is educate people about how to write their congressman, correct misinformation, and how to be effective in the NEPA process.

Right now the Nevada Park Service is broke and have done no ...ground work to pay for the pro...osed 1-8 Mineral and ...ecreation ...ovements in Southern Utah," ...asked. "The costs will be put into ...on you."

After the presentation at Tuesday's noon Chamber meeting the member said, "I don't think we have much money does exist to put together a local group. I am behind ...

An organization meeting was held Tuesday evening at the Uintah County Courthouse.

(Two article re-provided to us later on.)

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Land is an organism. When we see land as a community, to which we belong, we may begin to use it with love and respect.

There is no other way for land to survive the impact of mechanized man.

Aldo Leopold

UINTAH MOUNTAIN CLUB • P.O. Box 7832 • Vernal, Utah 84078-7832

September 12, 2000

Bert Kolstrom
Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, Utah 84078

Dear Bert,

The Uintah Mountain Club of northeast Utah submits the following comments for your consideration concerning the draft EIS for the High Uinta Wilderness Management Plan.

As you may know, UMC was in on the ground fl, or of the Limits of Acceptable Change process. Our representatives attended just about every meeting in the Heber City timeframe during those two years when these issues were being discussed. Like your staff, we've contributed a lot of time, effort and thought to this process. We feel like we have a vested interest in the outcome.

We know that many of you have devoted the last four years to this process. Our members appreciate your hard work and dedication.

But we do have several serious concerns with the draft EIS, not as a valid analysis of the situation, but as a vision document--a management plan that is worthy of the wilderness it attempts to manage. The management plan will take the wilderness into the next millennium. It must be bold and visionary, nurturing and restorative. 20a

We hope that you will ponder these comments, and accept them in the earnest and helpful spirit in which they are given. Thank you for your attention to our concerns.

Grazing In Wilderness

The EIS totally ignores the issue of current, ongoing grazing impacts upon wilderness by stating that "mitigation of these effects is outside the scope of this analysis and must be addressed during allotment planning."

(20a)We feel the revised desired condition descriptions (pg 2-2 through 2-5) provide managers and the public with working definitions of expected future conditions in the HUW. We also feel these definitions fully meet the letter and the intent of the 1964 and the 1984 Wilderness Acts. Remember, this document defines programmatic direction for the HUW. Future actions taken to maintain or improve resource conditions (when standards are exceeded) will nurture and restore areas within the HUW that have absorbed too much human induced change.

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This is a total abdication by the Forest Service of its responsibility to set goals and guidelines for grazing in wilderness that will result in a level and location of grazing that is *compatible with the spirit and intent of wilderness*. It is extremely important to have grazing subordinate to wilderness values and not vice versa. 20b

Sure, grazing is a legitimate use of wilderness. We all know that. But it is absolutely necessary to decide very soon where and what type of grazing can be allowed in the High Uintas Wilderness so that higher societal values inherent in this wilderness--and in the concept of wilderness--are not demeaned and degraded. 20c

Some of us just returned from a backpack trip from West Fork Blacks Fork to Right Hand Fork of the East Fork of the Bear River, through upper Rock Creek Basin. The country was extraordinary, expansive, wild. The trip was a welcome respite from the usual tedium, and the country had the *essential* appearance of being wild and unaltered--until our party got below Priord Lake in the Right Hand Fork of the Bear. There, in the midst of designated wilderness, what we found was country that appeared little different than what one sees in a **cattle feedlot**. The wet meadows were post-holed with countless hoofprints, 6-8 inches deep, the trails were beaten to a pulp, some switchbacks annihilated where the cattle were driven through trailside vegetation, the few dry, picturesque meadows suitable for camping in the drainage were full of cow shit, making campsite choices few, and the streambanks were pounded--and the flow of steams sometimes diverted--by the crush of cattle.

The Right Hand Fork of the East Fork of the Bear River is a perfect example of what we don't want, and should not have, in a designated wilderness area. It is one of the most heavily livestock-impacted areas--in or out of wilderness--that I personally have ever seen in a quarter-century of mountain wandering--in the Sierra Nevada, in the Cascade and Wind River ranges, in the Absorakas, in the Sangre de Cristo range of New Mexico, in the San Juan and Medicine Bow (Rawah Wilderness) mountains of Colorado, in the Trinity Alps, the Coast Range, and the Warner Mountains of Northern California. Another well-travelled mountaineer in our group agrees.

The Right Hand Fork is an area that the Forest Service should be **ashamed to call Wilderness**. There are several places where we can view the mess that cattle in a confined space cause--a feedlot atmosphere. We shouldn't have to endure it in a federally-designated wilderness area, a place where the appearance of naturalness and wildness should be paramount. The mess we observed in the Right Hand Fork detracts from the values which people seek in wilderness. In this case, either you allow the bottom of the drainage to be pounded to pulp by cattle--a singularly inappropriate use of the resource--or you let wilderness *be* wild and picturesque, reminiscent of a pre-commercial time. Allowing cattle to destroy the atmosphere of this lovely drainage has nothing to do with *multiple use*. It sacrifices one resource to another; it destroys one resource that cannot be replaced for the sake of delivering another resource (forage) which (a) has little relative regional or national economic or social value and (b) can be supplied easily elsewhere.

The problem in the Right Hand Fork, for instance, is that there is no way to disperse the cattle, given the constraints of topography. The trail used by backpackers and cattle runs hard by the watercourse. Nor does there appear to be room in the drainage for another trail. The logical conclusion should be that perhaps the Right Hand Fork is an inappropriate place for a cattle allotment. Other drainages may be suitable, but this particular drainage is not. Each drainage must be evaluated in this regard, with the preservation of wilderness values paramount. 20d

(20b)Desired conditions described in the document determine appropriate human uses (as determined in the 1964 and 1984 Wilderness Acts) in order to maintain and support natural processes, natural appearance, and natural ecological role of fire. However, the Wilderness act of 1964 and the Utah Wilderness of 1984 provide that livestock grazing can continue in the High Uintas Wilderness. In addition Congressional Grazing Guidelines for wilderness include "There shall be no curtailment of grazing in wilderness simply because an area is designated as wilderness, nor should wilderness designation be used as an excuse by administrators to slowly 'phase out' grazing. Any adjustments in the numbers of livestock permitted to graze in wilderness areas should be made as a result of revisions in the normal grazing and land management planning and policy setting process giving consideration to legal mandates, range condition, and the protection of the range resource from deterioration." Because of this guidance, any permitted livestock grazing decisions will continue to be made in Allotment Management Plans and for livestock grazing issues are considered beyond the scope of this document. This direction is given in the EIS on page 1-11.

(20c)The decision to allow grazing in wilderness was made in the Wilderness Act. The Act defines "where", to be areas that had permitted livestock prior to the effective date of the Act. Decision for levels of grazing is strongly indicated in Congressional Grazing Guidelines which state "It is anticipated that the numbers of livestock permitted to graze in wilderness would remain at the approximate levels existing at the time an area enters the wilderness system. Any adjustments in the numbers of livestock permitted to graze in wilderness areas should be made as a result of revisions in the normal grazing and land management planning and policy setting process, giving consideration to legal mandates, range condition, and the protection of range resources from deterioration."

(20d)Congressional Grazing Guidelines for wilderness include "Any adjustments in the numbers of livestock permitted to graze in wilderness areas should be the result of revisions in the normal grazing and land management planning and policy setting process giving consideration to legal mandates, range condition, and the protection of the range resources from deterioration." Because of this guidance, any range suitability decisions and permitted numbers of livestock decisions will continue to be made in the allotment management plans.

To this end, it is *essential* that the Forest Service start with **a vision** of what it wants the High Uintas Wildrness to be. This guiding vision must be in the management plan and it must serve as a standard for all future actions. The Forest Service should not merely say that it will deal with these issues in the allotment management plans when they come up for renewal revision. **Future actions taken in allotment management plan revisions must be tiered to the High Uintas Wilderness Management Plan**, and its goals and guidelines for what a wilderness should be. 20e 20f

Where it is certainly appropriate to postpone grazing decisions until the individual allotment is due for evaluation, the action taken at that time must be tied to standards and guidelines for grazing in the **vision document** for wilderness management--the High Uintas Wilderness Management Plan you are now considering. To simply say that this document will not deal with grazing issues is conceptually and professionally wrong. It ducks the real issue of where and what kind of grazing we want in the High Uintas Wilderness. To compartmentalize or fragment the issue is to allow the problem to fester.

We must not allow disgraceful situations like the cattle-related mess in the Right Hand Fork and other drainages to continue if we are to have wilderness that hews to the original intent of the Wilderness Act. On your Desired Condition Class scale of I to III, the Right Hand Fork is probably a IV or V. Your document should have the guts to state that conditions like that are unacceptable and incompatible with spirit and intent of Wilderness. I doubt that the Forest Service has the integrity and force of will to deal with this very important issue, but we can hope. 20g

Recreational Impacts

The purpose of the High Uintas Management Plan should not be to perpetuate traditional uses or hold the line at some existing level of use, but to manage the High Uintas Wilderness as wilderness. 20h

If one cannot now get the feeling of remoteness, solitude and naturalness--a primeval/pristine experience--from some areas of the High Uintas Wilderness, then, in the words of Captain Jean Luc Picard, we must "make it so."

Unpopular as this may be politically, it is the only legitimate way to manage genuine wilderness. Anything else is an exercise in cynicism. Drawing boundaries around areas in wilderness where one cannot expect to have a wilderness experience (No, wilderness is not "different things to different people": what wilderness is spelled out in the Wilderness Act is just such an exercise.

Your apparent assertion that "wilderness is in the eye of the beholder" has no currency when you are charged to manage this area to maintain "its primeval character and influence" [Wilderness Act, Section 2(c)] and for its "outstanding opportunities for solitude or a primitive and unconfined type of recreation (again, the Wilderness Act). Some of the areas you have consigned to Class III are anything but "primeval" in appearance (You have described the conditions at these sites very adequately.), and have absolutely no "opportunities for solitude" during the summer months. It appears that many areas have been written off, "ghetto-ized" by assigning them Class III management status. Shouldn't the purpose of a management plan be to fulfill the intent of the Wilderness Act by making areas that are now heavily impacted more wild. Shouldn't it try to change traditionally destructive use patterns?

20e) A vision for the HUW includes the desired conditions statements (pg. 2-2 through 2-5), a recognition of where the HUW fits into the Utah and National Wilderness Preservation System (Record of Decision), an explanation of managing wilderness for all resource values, rather than just recreation (desired condition statements), and a strong commitment to manage the HUW as one NF boundaries and in a single unit (Record of Decision).

20f) As an amendment to the Forest Plans, direction in the [illegible] ground cover standards will be consulted and adhered to [illegible] Management plans are revised.

20g) We appreciate your observations of the condition [illegible] Hand Fork portion of the East Fork Bear River cattle allotment. We believe our report is that existing resource conditions do not meet the standards for any [illegible] described Desired Condition Classes. Your description of damages to trails, wetland meadow function, and stream bank stability is very disturbing. We agree that degrading resource conditions should not be allowed to exist in grazing allotments, irrespective of whether they occur in wilderness or elsewhere on National Forest lands. These conditions will certainly be analyzed upon revision of the AMP for this allotment. At that time, concerns with significant or permanent resource degradation will be addressed, and the appropriateness of this drainage for this use may well be considered under alternatives considered for action. In the meantime, it is also possible that some if not all of these conditions could be corrected by making changes in the annual operating plan for the allotment. The existence of social conflicts between recreation and grazing (e.g. suitable camping areas being full of cowpatties), although not less disturbing, are certainly more problematic to reconcile in view of the special status granted livestock grazing in the Utah Wilderness Legislation. Certainly, grazing operations can be tailored, either through revising the annual operating plan or the allotment management plans. These changes can be expected to reduce but not totally eliminate these conflicts.

20h) It is not the purpose of the plan to perpetuate traditional uses or hold the line at some existing level of use. Its purpose is to provide consistent, updated direction on the Ashley and Wasatch-Cache Forest Plans through the development of new desired future condition statements and standards for the High Uintas (pg. 2-2 through 2-5). Monitoring the indicators for these standards may well result in future management actions that may alter traditional or existing uses. This is a programmatic document. It does not make specific recommendations for immediate change. Monitoring the indicators for the various resources will indicate what future management actions may be necessary.

We understand Class I and Class II status. It is difficult to grasp why any wilderness 20i
area should have Class III areas. These areas are not even remotely "primeval," and the recreational experience found in them can as readily be attained outside as inside wilderness. Federally designated Wilderness should have *prestige*, be set apart as something special. The wilderness experience should be *unique*, based upon the "primeval," "untrammelled" quality of the area. *Lots of people having fun in close proximity, surrounded by beautiful scenery* is not 20j
unique, nor is it the definition of the wilderness experience. It is an experience readily available outside of Wilderness.

If the wilderness experience cannot be kept unique, then what is the sense of "wilderness." This is the basic philosophical question that the Forest Service must consider in order for its management to be relevant. Continuing to allow popular campsites to be "hammered" and irretrievably altered by human activities cheapens the wilderness experience. This is not merely our interpretation as "Group II users." Go back for the umpteenth time and read the Wilderness Act just one more time. You might also read the writings of the visionary men and women behind this landmark piece of legislation - their concepts and beliefs of what wilderness should be. Then ask yourself if modern Forest Service wilderness management still hews to those basic concepts.

As long as we continue to allow wilderness to be used in just the same way that non-wilderness lands are used (minus motorized vehicles), with large groups, lots of fire rings, toilet tissue middens, denuded campsites and inappropriate pack stock use, we will have de facto non-wilderness within designated wilderness areas.

One important change in management would be to begin to permit the most popular 20k
areas. Permits would include a requirement for smaller group size, strictly enforced, plus a requirement for backpack stoves in heavily-used areas where live trees have been chopped up and dead standing trees stripped for firewood. Sure, this means less freedom. That is inevitable. The world is becoming more populous and it would be naive indeed to imagine that we can continue freedoms to manage the range of humankind. It's the way the world is evolving. Knowing a resource to be destroyed to preserve some ideal of unfettered personal freedom in wilderness is not our idea of wise resource management. The mere fact that many areas have suffered from overuse should tell us that users have not put adequate restraints upon themselves to leave the resource unimpaired for other users. Who will do it if not the Forest Service?

We'd rather see all areas in the High Uintas managed under Classes I and II, and we'd 20l
like to the Forest Service embark on the long, deliberate process of restoring most traditionally popular (and abused) areas to a state consistent with Class II standards. High would be wilderness worth having.

Stakeholders may gripe, but remember - those who gripe the loudest are probably those most responsible for the deterioration of the feeling of wilderness in some areas of the High Uintas. They will want to perpetuate their activities regardless of whether those activities are compatible with the spirit and intent of wilderness. Use patterns must change if we are to prevent further resource damage and restore some damaged areas. But this will not happen without a nudge and firm direction from the Forest Service.

Now I suppose you are nodding knowingly and thinking, "Ah, that's just what we expect to hear from a 'Group II user'." The "book" on us is that we are biocentric, don't much care about people or traditional uses. We're elitist, but curiously self-loathing; we see

(20i)The use of desired condition classes is applied to this plan as a means to allocate resources by acknowledging diversity in use patterns and user behaviors. Establishing varying classes in the wilderness, allows management to use different strategies for different sections of the wilderness. The kind and intensity of management can be varied based on the desired condition sought. Without using classes to allocate management resources and efforts, there is an inherent danger that the entire wilderness may degenerate to some minimum standard due to an unfocused management approach. Defining these classes provides managers with a tool to enhance the protection of wilderness.

(20j)We realize that many activities users participate in are not wilderness dependent. It is our policy to try and steer them to non-wilderness areas for their activities. Increase User education coupled with wilderness education for employees that respond to telephone inquiries...are examples of management approaches the Forest Service uses to mitigate conflicts between user expectations with wilderness values. Designation of Class III areas provides an opportunity to direct education and interpretative programs at those visitors. When necessary, we will employ law enforcement to curb inappropriate behavior.

(20k)Management actions run along a continuum from the benign (e.g., education) to law enforcement actions. This allows managers to use the "minimum tool concept" in choosing a course of action to address impacts. Voluntary permits are issued at the Mirror Lake trailheads and allied stories to the popular Naturalist Hours. Registration boxes are being added to all trailheads on the Forest side and will serve as an information gathering tool. No plans exist at this time to institute a wilderness wide permit or designated campsite system. However, designated campsites at Grandaddy Lake are under consideration to allow for the damaged areas near the lake shore to be revegetated.

(20l)We feel the revised desired conditions statements and standards and guidelines found on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Act and will protect all HUW resources for future generations.

wilderness as a "sacred" place, like a bunch of hypocritical neo-modern druids. Perhaps we see ourselves as better or more enlightened than the rest of the wilderness users.

We are uncomfortable with your Group descriptions, which seem like an attempt to pigeon-hole wilderness users. In fact, many of our members have characteristics that would place them in any one of the three groups at a certain time of the year. We suppose that these group descriptions were adopted in order to demonstrate your attempts to satisfy (or disappoint) all user groups equally. In this context, Alternative I might seem to be a comptromise.

But wilderness management should not so much be a comptromise as an attempt to adhere to the basic concept and ideals of what a wilderness should be: primeval, untrammelled, free from the signs of humans and their commerce, a place where "outstanding opportunities for solitude" are found everywhere within the designated wilderness, and not just in Class I category lands. 20m

It is a galling irony of our time that many areas outside of designated wilderness have more wildness, more solitude, less cowshit, and less human impact than areas within Wilderness. It is because wilderness is not managed as something special. In many cases, in fact, the responsible agency just isn't managing wilderness at all.

But if you aren't managing wilderness as something special you aren't managing wilderness according to the founding tenets of the Wilderness Act.

Keep it pristine, even if it means some restrictions and the institution of a permit system for the most popular areas. Visiting a real Wilderness in places as extraordinary as Red Castle should be worth the hassle of a permit system.

We are heartened by your apparent commitment to make some long needed changes in Naturalist Basin. We strongly encourage you not to stop there. All heavily used areas should be slated for rest and restoration, perhaps on a rotating basis. Larger groups who wish to use these areas should demonstrate knowledge and commitment to minimal-impact campin,, before a permit is issued. Permits should be limited to a number that will make restoration possible in the basin or drainage. Most areas in the High Uintas will continue to not require a permit system. A visit to a real wilderness should be special, but it may not be possible for some traditional groups each year. Permitting will be especially important as the population and number of users increases in coming years. 20n

The argument could, of course, be made that disgruntled wilderness users may cease to support further wilderness and wild lands protection. They might even become staunch opponents of wilderness. That may be true. But what good is an existing Wilderness if it's not a *wilderness*, where only natural processes are at work? Education is the answer. And the Forest Service could do a far better job of educating the public and managing its wilderness resource if it could pry away more funding from money-losing timber sales, individual His and Hers streamside privies on the Green River, and other repositories of fiscal silliness.

Wildlife/ Fish Management

The Forest Service has established an artificial dichotomy in the interest of "interagency cooperation." The result is another abdication of its statutory responsibilities.

Under this dichotomy, the Utah Division of Wildlife Resources manages the wildlife and fish of the High Uintas Wilderness, the Forest Service manages the habitat.

(20m)The 1964 and 1984 Wilderness Acts do not prescribe "outstanding opportunities for solitude" for the entire wilderness. Rather the Acts say that "outstanding opportunities for solitude or a primitive and unconfined type of recreation" exist. This management plan proposes a blend of the recreation opportunities and the solitude opportunities mandated in the Acts. We feel the (revised) desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(20n)The rest and rotation concept has much merit. This concept will be given much consideration in future management of high use areas. As a management tool, rest and restoration of heavily used areas seems to work best when combined with a system of visitor permits and travel distribution. In this sort of a system, camping sites are designated and finite in number, and permitted visitor use is balanced accordingly. Theoretically, at least, the system is designed with overall carrying capacity in mind. Nonetheless, campsites with unacceptable resource conditions are bound to occur, especially in heavily used basins. While some of these unacceptable sites can (and probably should) be rehabilitated and left open for continued use, some sites inevitably will have to be restored and semipermanently rested. Successful restoration then becomes dependent upon the existence of other suitable camping areas that displaced users can move on to. In some of the smallest, heaviest used basins, "new" camping areas simply may not exist. The regulation of visitor use with permits and quotas may become necessary in these smaller basins to achieve any measure of successful rest and restoration of heavily used sites. However, the HUW management plan does not propose the use of any new regulatory management tools at this time.

But how manage the habitat without having some measure of control over the wildlife? And how manage the wildlife if habitat cannot be manipulated?

An unfortunate example of this is the introduction of a non-indigenous animal--the Rocky Mountain goat (Oreamnos americanus)--into the High Uintas by the Utah Division of Wildlife Resources with the collusion of the Forest Service.

This is not a "reintroduction," since there has never been any credible scientific proof or corroborated historic evidence that the species ever existed as a native of the High Uintas.

Your EIS states the case succinctly (page 2.3, last paragraph): "Wildlife transplants are **limited to indigenous species"** by both forest plans.

Yet where were these guidelines in 1988 when the Forest Service made it possible for the non-indigenous Rocky Mountain goat to be introduced to the High Uintas in Whiterocks Canyon, with the foregone conclusion that the animals would migrate from the tranplant site to the High Uintas Wilderness?

Where, indeed, were these guidelines in 1992 when the DWR repeated the action, or last week, when another transplant occurred at Leidy Peak, just a a few air miles from the High Uintas Wilderness boundary?

DWR has no right to do this, and the Forest Service has every right to issue a closure order to prevent the inevitable migration of this non-native species onto Federal wilderness. But the Forest Service did not prevent the first or subsequent transplants. Why? 20o

The Forest Service has the statutory responsibility to protect wilderness lands from degradation, the ecosystem from dilution or perversion by non-indigenous species. It has pretty much given the Utah Division of Wildlife Resources *carte blanche* to do what it will with wildlife introductions, and in doing so has abdicated its duty to protect the substrate, the habitat for indigenous species.

This is borne out in an August 4, 1994 letter to UDWR from the Uinta and Wasatch-Cache National Forest supervisor which stated that, "...until such a management plan (referring to a statewide mountain goat management plan) has been developed through *the appropriate NEPA process* (emphasis added), it will be the position of the National Forests in Utah to no longer permit or approve any future transplants of goats from or onto National Forest System land within the State." A subsequent statement from the Regional Forester to the office of the Utah Wilderness Association confirmed that position: "As stated previously, until a State-wide Rocky Mountain Goat Management Plan is developed through *the appropriate NEPA process* (emphasis added), the National Forests in Utah will not permit or approve any future tranplants of goats from or onto National Forest System lands within the state."

Well UDWR came up with its own version of a management plan. But it wasn't a NEPA document. Indeed, it was far from it. More of a manifesto, we'd call it. It provided no credible scientific proof or historical corroboration of the mountain goat's indigenuity, and utterly failed to consider the possible impacts of introducing more animals of the species into the High Uintas or any other wilderness in Utah--something a true NEPA document is bound to do.

The Forest Service backed down.

And it backed down on fish stocking as well. How can the Forest Service manage habitat for amphibians, macroinvertebrates and indigenous fish if UDWR has the upper hand in deciding where and when fish stocking occurs? 20p

(20o)The State has the responsibility to make the determination as to which wildlife and fish species are native or indigenous. Where it is possible to issue a closure order to prevent the release of animals on National Forest System lands, animals themselves cannot read and a closure order has no effect on where they decide to migrate. Also, where a closure order can be issued, the State has the option of releasing animals on State or private land adjacent to the Forest, knowing that the animals will move onto the Forest.

(20p)The UDWR is not stocking any lakes which they have not historically stocked. They do not plant any lake that is less than 2 surface acres. At the present time the UDWR is managing about 50% of the lakes that are 2 surface acres or larger. Some of these are managed for native species, which means that less than half the lakes two acres in size or larger are being stocked. Possible loss of amphibians, macroinvertebrates, and indigenous fish in lakes that have been stocked for decades, has already occurred. This loss is not perpetuated on other lakes since the UDWR does not plan on stocking other lakes. The Forest Service and the UDWR will be preparing a memorandum of understanding dealing with fish stocking within the wilderness.

Amphibians are in dire danger in Utah, and habitat degradation is undoubtedly a major contributor to this situation. I am not aware that there has been a comprehensive inventory of amphibians in the High Uintas. Such an inventory is key to future decisions concerning fish stocking in the High Uintas Wilderness and elsewhere. 20q

Lakes that have already been stocked have an altered ecosystem, by definition. Future fish stockings in those lakes might be considered a moot point from a biologic standpoint, the assumption being that the system has probably already reached equilibrium. But until we and you address the disappearing amphibian issue in Utah seriously, we cannot know how important these and unstocked lakes are to the preservation and restoration of the native amphibian populations. A **moratorium** should be placed on any further fish stocking in lakes that cannot sustain their own fish population from year to year, as well as lakes that have not already been stocked. These are few. 20r

Lakes that have a wild, self-sustaining population of fish should do well with minimal or no stocking, and might be stocked from time to time in response to heavy fishing pressure. A catch-and-release program (not compulsory) might be begun to reduce the need for stocking. Some lakes may actually be better off "fished out," and not re-stocked.

We do not mean to suggest that the Forest Service should have an adversarial relationship with the Utah Division of Wildlife Resources. But the Forest Service has a **solemn duty** to protect the Federal lands held in trust by all Americans. This supersedes any perceived duty it has to UDWR to be nice, get along, go along or capitulate on the stocking transplant issue.

The Forest Service is a master at public relations; it should be able to placate UDWR while standing firm to protect indigenous species and their habitats from perversion by non-indigenous game animals and fish.

The Forest Service has likewise abdicated its control over predator populations in the High Uintas Wilderness. APHIS/ADC is now in the driver's seat, responding to predation, real or imagined, by native wildlife. 20s

But is this logical? Is any predator control in wilderness warranted?

If a predator cannot act its nature in wilderness, then where can it? In wilderness, Man, and by logical extension, his livestock, are visitors. Still, stockmen think that they can have it both ways.

When predators leave wilderness to prey upon livestock on private or non-wilderness Federal lands, the stockmen and ADC kill them. When domestic livestock invade the predator's wilderness home, and the predator does what comes naturally, the stockmen and the ADC, with the collusion of the Forest Service, kill them. Predators just can't win. And even Wilderness is no haven.

Stockmen have a right to protect their investment, and when the predator enters private lands and most public lands--the stockman's home--he does so at his own peril. When stockmen invade the last natural haven of the predator--Federally-designated wilderness--it's no different: the predator again pays with his life. Whether the predator goes to the livestock or the livestock are driven to him, the predator winds up the loser. And so does the wilderness, where natural processes are supposed to dominate. What could be more natural than predation by an animal genetically programmed to that behavior?

We suggest that the High Uintas Wilderness Management Plan be an unequivocal manifesto, asserting the right and responsibility of the Forest Service to manage wilderness 20t

(20q)A comprehensive inventory of amphibians in the High Uintas is desired and would add much to our knowledge base for all management decisions. In respect to fish stocking, the UDWR is not stocking any lakes that they have not been stocking historically. They do not stock any lake less than 2 surface acres, and they plant less than 50% of those. The Forest Service will be developing a memorandum of understanding with the UDWR to deal with the fish stocking issue.

(20r)Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4. The Wilderness Act of 1964, Section 4 (d) (8), states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish management in the national forests." The Forest Service is working with the State in developing a memorandum of understanding to outline roles, responsibilities and policies concerning fish stocking in the wilderness. At the present time the State only plants lakes 2 surface acres in size or larger, and they plant less than 50% of those.

(20s)In addition to public involvement and disclosure, a Forest Service Biologist participated on the ID team ADC used to prepare an Environmental Assessment (EA) for predator control in Utah. The HUW EIS is compatible with ADC's EA which was signed in 1996. The Forest Service works in cooperation with APHIS ACD in all predator control activities. It has been determined in the above EA that predator control in the High Uintas is limited to snares, traps, dogs or shooting. Aerial gunning, M-44's, and "denning" are not allowed in wilderness.

(20t)The Forest Service has the authority and responsibility to manage wilderness system lands for purposes described in the Wilderness Act, and to maintain ecosystem integrity. However, much of this work must be done in cooperation and coordination with other agencies that also have a legal responsibility for some aspect of management on wilderness lands. The fact is that the Forest Service does not have an "unequivocal manifesto". We will not assert rights we do not have.

lands for ecosystem integrity.

The issue of **non-indigenous transplants** must be broached and resolved. 20u

The issue of **fish stocking** must be broached and resolved. 20v

The Forest Service should take back its responsibility to native predators by bumping APHIS-ADC from wilderness lands until they are summoned by the land management agency. By and large, wilderness should be a haven for large predators, and "let the buyer beware" (to borrow a business law term) if he grazes his livestock there. He is, after all, invading a haven dedicated to wildlife and ecosystem protection, where wildlife are expected to act their nature.

Your EIS states (page 1-8) that "One of the specific purposes for which the High Uintas Wilderness was established was preservation of wildlife habitat." And yet only pr. Intors are treated pretty much the same, inside or outside of wilderness.

Are these radical ideas? Some would say so.

Here's another radical idea: How about restoring Rocky Mountain Bighorn Sheep to the High Uintas Wilderness? (We prefer the term "restore" to the inaccurate term "reintroduce": no one introduced the Bighorn, so how can we re-introduce it?)

But let's not do it in a fatalistic, passive fashion, transplanting wild sheep far removed from the wilderness and hoping they'll colonize the High Uintas. Bighorn sheep are poor colonizers. UDWR and the Forest Service both know that. Both agencies now treat the Bighorn the way some T and E transplant species are being managed: experimental, non-essential. If some Bighorn sheep move long distances to the High Uintas from their current transplant sites and do well, it is merely by chance, and that's O.K. If some move to the High Uintas and catch a domestic sheep disease and die, that's O.K., too. No fault, no agency to blame. A pretty passive approach.

Meanwhile, UDWR and the Forest Service are actively transplanting an animal that local dwelling in the High Uintas Wilderness--*Oreamnos americanus*.

How about setting a goal in the High Uintas Wilderness management Plan of restoring 20w
the Bighorn sheep--a magnificent indigenous animal--to its rightful place in the alpine ecosystem of the wilderness?

After all, if the Forest Service can stand idly by while the UDWR introduces a large, non-indigenous animal to the wilderness, it should be more than willing to restore a large and equally impressive indigenous species to its historic place in the high country.

But I think that you and I know both know the reasons why UDWR and the Forest Service don't pursue this goal more aggressively. Our response is: If agencies can't or won't restore the indigenous Bighorn sheep, they have no business introducing the non-indigenous Rocky Mountain goat to a wilderness area.

Introduction of goats has unforeseeable consequences, but may be injurious to fragile alpine ecosystems. The mountain goat is a hardy, tenacious animal with high area fidelity and a catholic diet. If UDWR introduces the animals the agency will probably try to monitor herd numbers and numbers. But the state agency will not be interested in monitoring the effects of the animals on related habitat--existing plant and animal ecosystem relationships. That is too complex for them. They are primarily interested in raising a large game animal for sportsmen to and public enjoyment. They haven't the time, money or interest. The task of evaluating ecosystem impacts will fall to the Forest Service, which also has no time, no money and no staff. If the effects of the foreign animal is studied appropriately, it will take more

(20u)The Wilderness Act of 1964, Section 4 (d) (8), states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish management in the national forests."

(20v)Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4. The Forest Service is working with the State in developing a memorandum of understanding to outline roles, responsibilities and policies concerning fish stocking in the wilderness. Draft cutthroat trout conservation agreements and strategies also identify the need for native fish stocking.

(20w)This has been a goal of the Forest Service for many years and we continue to work with the Utah Division of Wildlife in monitoring and improving the herds that have been reintroduced already, and to their plans to supplement those herds.

time, money and manpower than the agency says it has. We are frequently told how little financial resources the Forest Service has. (It seems to have no money for anything but timber sales and fancy toilets.)

How will the Forest Service finance its responsibility to study the effects of the non-indigenous Rocky Mountain goat on the alpine ecosystem in (or outside of) wilderness?

The High Uintas Wilderness Management Plan should mark an end to these shenanigans. It should set a clear course toward **restoring all indigenous species** to their rightful place in the High Uintas: fisher, wolverine, perhaps even leave the door open for wolves. Grizzlies may have to wait until we've demonstrated we can handle the "little" things--like inventorying and restoring the small furbearer and amphibian populations, although, God knows, there's little time left for the grizzly to find a new home in the lower 48 states.

There's a lot of work to do. Your Wilderness Management Plan pretty much ignores these very important issues of wilderness integrity.

Outfitting and Guiding

Probably the best discussion in your draft EIS.

Outfitting and guiding are perfectly appropriate uses of wilderness, and in almost all cases the outfitters and guides have much better wilderness etiquette than the average non-commercial wilderness user. Most commercial outfitters and guides in the High Uintas Wilderness are closely attuned to a land ethic. In that regard, they perform a valuable educational as well as recreational service. They also help the elderly and disabled enjoy the wilderness experience.

Great care must be taken not to reach or pass the saturation point for client days. The dominance of outfitters and guides and their clients that has occurred on permitted Western rivers must not be allowed in the High Uintas Wilderness, and we are confident that you are aware of that. The current mix is about right. Even though the Uintah Mountain Club prefers Alternative 3, we feel that there is currently no need to curtail existing outfitting and guiding activities. (In fact, if we had our "druthers," we'd much rather see some of those rank family horse outfits--the traditional (ab)users--shut down, but that's just wishful thinking.)

20y

20z

Desired Condition Classes

The Uintah Mountain Club prefers, and strongly urges you to implement, **Alternative 3.**

20aa

Your preferred alternative doesn't have nearly enough Class I areas, and consigns (condemns?) far too much land to Class III. Any wilderness worthy of the name should give the maximum sense of solitude, insularity, and primeval-ness within its boundaries. There should be a lack of permanent visible scars cause by human activity. It's in the Wilderness Act!

20bb

Further, the Forest Service Manual states that "Where there are alternatives among management decisions, **wilderness values shall dominate over all other considerations**" (Emphasis added.), and that wilderness shall be managed "toward attaining **the highest level of purity in wilderness...**" (Emphasis added.)

(20x)Mistake in numbering

(20y)At this time the percentage of wilderness visitors using outfitter services is estimated at less than 1% of the total public recreation use. A need has been determined for outfitted services in the HUW (see O/G Needs Analysis). This need is translated into service day ceilings defined on pg S-10 and 2-18.

(20z)The Forest Service agrees. The service day ceilings set by this document permit current outfitted operations to continue and allow outfitters room for growth if they meet the needs criteria defined on pages 2-2 and 2-3.

(20aa)Preference for Alternative 3 noted.

(20bb)Refer to the rationale in the Record of Decision.

On page 1-5 you point out that "Where a choice must be made between wilderness values and visitor or any other activity, **preserving the wilderness resource is the overriding value. Economy, convenience, commercial value and comfort are not standards of management.**" (Emphasis added--and needed!!) Indeed, you quote quite accurately from the Forest Service Manual, and that should be your guiding light.

Yet on the very next page (1-6) you appear to be fretting over "the different backcountry capabilities, skill levels, values and expectations" of wilderness visitors...as if you are worried about the *comfort* and *convenience* of the High Uintas Wilderness user. As if you were planning a theme park with something for everyone. Let your guiding light be the integrity of true wilderness, with all that implies. Mountains without handrails. Wilderness on its own terms. Wilderness the way the fathers of the Wilderness Act envisioned it.

Your decision to put only 23 per cent of HUW land in Class I and up to 9 per cent in Class III seems to reflect that worry for the comfort and convenience--and "traditions"--of Groups 1 and 3 wilderness users. This is inconsistent with what you have already identified in the Forest Service Manual as being the "overriding" concern of wilderness management. Class III lands offer no solitude during the summer months and have been altered by human activity, albeit reversably, given time. Class I lands best speak to the spirit and intent of the Wilderness Act, yet *less than one-fourth* of the entire wilderness is designated as Class I under your preferred ("increased resource protection") alternative. 20cc

This does not jibe with the direction you are given under the Wilderness Act and the Forest Service Manual, and although you may rationalize your choice, there is no hiding the inconsistency.

Alternative 3 is a much better balance of classes. There is still less than half of the HUW in Class I, but the alternative acknowledges that almost all of the wilderness should remain wild, untrammelled, unscarred, where solitude is the rule, not the exception. Big, hard, difficult wilderness. 20dd

We should point out that there are inconsistencies with the designation of class boundaries between alternatives. 20ee

For instance, you call your preferred alternative the "increased resource protection" alternative, yet some areas in Alternative 2 (Increased Access) get more protection than they do in Alternative 1. This is especially obvious on the North Slope.

Example: The drainage of West Fork of Beaver Creek is Class II in Alternative 1, but in Alternative 2 only the trail is Class II, while the surrounding drainage has been upgraded to Class I. 20ff

Question: If you are willing to make the West Fork of Gilbert Greek Class II in Alternative 1 (the "increased resource protection" alternative), and the high country around the West Fork of Beaver Creek Class I in Alternative 2 (the "increased access" alternative), why not adhere to your Class II designation for the West Fork of Beaver Creek and adopt Class I for in your Alternative 2 for the high country around the West Fork? 20gg

The way things are drawn up, the Middle Fork of BEaver Creek is better protected (Class II) in the "increased access" alternative than it is in the "increased resource protection" alternative, where it is Class III. This doesn't make sense. It seems arbitrary and capricious. The same goes for Island and Kabell lakes areas. 20hh

This inconsistency is confusing and nonsensical.

The Desired Condition Classes are extremely important as a concept, and that is precisely why **the High Uintas Wilderness should not be saddled with the mediocrity of**

(20cc)The intent for all the classes described in this document has always been to comply with the Wilderness Act of 1964. The descriptions of these classes have been carefully analyzed and reworded to ensure compliance with the Act. Over the years it has become evident that those wilderness experiences being pursued by our visitors do vary within the spectrum of "wilderness opportunities" thus the different classifications. Areas of environmental impacts such as compacted and bare soils in popular sites are very much a concern even in Class III. Site specific evaluation and corrective measures will be developed for such sites no matter what the class.

(20dd)Preference for Alternative 3 noted.

(20ee & ff)Noted. In some cases, the descriptive terms for alternatives are inconsistent with the designations, they have been removed.

(20gg)Much of your discussion gets at the root of the problem of naming alternatives as responded to above. Refer to the Record of Decision for the rationale of the final decision which is based on comparing the actual alternatives and not just the names.

(20hh)It is not arbitrary and capricious so much as an illustration of the difficulties faced when trying to draw up an array of reasonable alternatives over a large area of land. Please compare the alternatives not just by the general name but by using the descriptions and maps.

Alternative 1. You should strive for a higher level of purity than now exists. A commitment to restore Naturalized Basin is not enough. Think big!

We strongly feel that all ungrazed portions of the High Uintas should have Class I standards. 20ii

We feel that a tenth of the wilderness with Class III standards is an admission that the Forest Service does not have the ability to make things better on the HUW. The status quo will prevail.

The draft EIS should state **the current ecological conditions of each grazing allotment within the wilderness and set unequivocal goals and guidelines for where and what type of grazing will be allowed within the HUW. The Management Plan should serve as a guide for future allotment management decisions,** not vice versa. 20jj

The EIS should reaffirm the Forest Service's commitment to ecological integrity and its opposition to the introduction of non-indigenous species. Without this stated commitment, the Management Plan is a weak, inadequate document, devoid of vision or guts. Your agency must make it perfectly clear that the Forest Service bears primary responsibility for ecosystem integrity, and that that integrity cannot be maintained without control over which wildlife and fish species are introduced by the UDWR. 20kk 20ll

Some years ago the Utah Wilderness Association proposed a **Yellowstone River Colorado Cutthroat Trout Refugia.** This excellent idea should be resurrected and implemented. Further introductions of non-native species in this drainage should be prohibited. 20mm

Restoration of indigenous species - some now extirpated or rarely seen (and probably with tenuous populations) - should be a stated goal of the management plan. An inventory of small furbearer and amphibian populations would be an important first step. 20nn

Restoration of the Rocky Mountain Bighorn sheep to the High Uintas Wilderness must be an active, not a passive, process, and should be a stated goal of the management plan. You don't have to say how you're going to do it, but you need the goal nonetheless. 20oo

We support **Alternative 3** as the only alternative that would lead the Forest Service toward a High Uintas Wilderness worthy of the name and consistent with the spirit and intent of the Wilderness Act. If you will not adopt Alternative 3, then we urge you to fashion another alternative closer to this Alternative 3 than Alternative 1. Alternative 1 is not a bold visionary course for the flagship wilderness. 20pp

We hope that you will agree that this draft EIS needs quite a bit of work before it is truly adequate. Only then will a document emerges as the High Uintas Wilderness Management plan.

Best regards,

Will Durant
Chairman, Natural Resources Committee

(20ii)Some areas not grazed and not in Class I do not have Class I values for reasons other than grazing. Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways: 1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16 of the DEIS). 2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas. 3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed. Important to this issue is the scale of soil and vegetation loss. Even in areas identified as Class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17.

(20jj)As an amendment to the Forest Plans, direction in this document regarding vegetation standards will be considered and adhered to when Allotment Management plans are revised.

(20kk)Desired conditions described in the document determine appropriate human uses as determined by the 1964 and 1984 Wilderness Acts in order to maintain and support natural processes, natural appearance, and natural ecological role of fire. Flora and fauna (vegetation and wildlife) are addressed under desired condition, indicators and standards, and other places in the document. Page 2-3 reaffirms our commitment to considering re-introductions of indigenous species.

(20ll)Within the context of the Wilderness Acts, which defines the role of the State of Utah, we believe the desired conditions defined in this document manifest the Forest Service responsibility for maintaining ecosystem integrity in the HUW.

(20mm)The Forest Service supports discontinuing fish stocking in Class I. This will be dealt with in the memorandum of understanding on fish stocking that will be drawn up between the Forest Service and the State. The issue of the refugia will not be dealt with in this document since it would be a cooperative responsibility with the State and agreements would be needed to outline roles and responsibilities for implementation and enforcement.

(20nn)Reintroductions and supplemental transplants are a function of the Utah Division of Wildlife. The Forest Service is supportive of these activities and continue to work with the Division in determining the feasibility of the transplant and the level of environmental documentation which is needed on a case by case basis. This goal will be stated in the FEIS.

(20oo)Preference for Alternative 3 noted.

(20pp)Non-support for Alternative 1 is noted.

Bert Kulesza
Supervisor Ashley National Forest
355 N. Vernal Ave
Vernal, UT 84078

September 13, 1995

Dear Mr. Kulesza:

I realize that you and you personnel do not always have the time you need or want to spend in the wilderness. I do not profess to be an expert on the High Uintas wilderness, but I would like to share some of my thoughts and ideas about it with you.

As many of you know, I was a member of the L.A.C. committee that worked on the High Uinta wilderness. During that time [I felt that user education was the key to helping protect the wilderness. I still believe this is a true statement.] Somehow the USFS is going to have to try to reach all the various user groups and try to educate them with "leave no trace camping" and "outdoor skills and ethics". 21a

I feel it is a predetermined thought that backpackers do not impact the back country. This is not true, everyone that enters the wilderness will leave some kind of impact, recreational horse users as well as backpackers. With proper equipment and education horse impact can be greatly reduced. There are two groups that the USFS might enlist to help educate horse users, the Back Country Horsemen and the Outfitters/Guides. Maybe some kind of joint volunteer project with horsemen, backpackers and boy scouts would help everyone understand the other groups point of view.

[illegible] that at least one of the non stock use Outfitters/Guides focuses on teaching wilderness skills, another one provides hiking and teaching environmental education and wilderness ethics. Has the USFS ever approached the Back Country Horsemen and/or the stock use Outfitters/Guides to try to educate horse users in these areas?

In the past the Ashley and Wasatch-Cache Forests each had different group size limitations. This resulted in confusion and consternation among the users of the wilderness. The

(21a)Presently registration information suggests that between 10-20% of the visitors to the HUW use stock and 5-20% of those are using more than 7 head of stock. According to the literature (Cole, 1989), popular guide books (Davis and Veranth, 1993) and Leave No Trace publications (Harmon, 1994), in more pristine areas large groups can cause greater resource impacts. The Class I desired condition description (pg xx) challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted. Stock users who choose to travel in Class I accept the responsibility to travel lightly and in small groups.

people that formed the L.A.C. recommended to the Forest Service a uniform standard, which has been adopted, which eliminated much of the confusion for all concerned. This was formalized in special order 36 CFR 261.58 (f). There were many different user groups that agreed on these numbers. I understand the desire to make smaller groups for class I. [Here are some reasons I believe the number should remain the same through out the wilderness. 21a

1. The Forest Service can not tell you what the average group size for recreational horse users is now. So why all of a sudden pick the number 8?

2. The average recreational horse user will have one pack horse for every 2 people. Most back packers will carry approximately 50lbs. of gear. Using that weight for horse users, that is 100 lbs for 2 people on one pack horse. But when you use the now recommended low impact equipment to help reduce horse impact such as electric fence, high line ropes, tree savers, hobbles, picket lines, and extra feed to reduce grazing impact it can bring the weight up another 50lbs. or more. Using only these numbers that will only allow 4 people in a class I area.]

3. When you start setting numbers, especially smaller, people will say you are trying to eliminate horse use. This is a comment I often hear from some users that go into the wilderness in groups smaller than the numbers now in effect. These are the groups we need to educate not alienate.

4. The Forest Service could use education through the different user groups to encourage people to go in smaller groups.

5. It will create user conflict when you are in a class I area and on a trail where 15 head of stock now you will have someone trying to tell people they are not legal which will just cause problems [illegible] 21a

[illegible] the Forest Service is now receiving field observation will be greatly [illegible] 21b

[illegible] desired conditions of class II and class III it is evident that trails [illegible] III. It states in class III desired condition "well developed [illegible] trails and visitors encounters with other groups, campers and wilderness [illegible] are common. Conditions that result in user conflicts are expected." 21c

Trails are an [illegible] part of the wilderness. They have to be there or people will blaze their own trails to the places they like to visit. With a properly placed and designed trail it will add to the true idea of wilderness in these ways:

1. Eliminating duplication of trails to an area.

2. A properly maintained trail will show evidence of man. The wilderness act Sec2-C states "generally appears to have been affected primarily by the forces of nature, with the imprint of mans work substantially unnoticeable". Being over 400,000 acres with what trails there are I believe that this statement is not going against the wilderness act. I would like to invite you to the Kamas Ranger Dist. and see the trail that was built in the lower end of Shingle Creek. This type of trail would add to the wilderness type setting we are all trying to achieve. It takes time and money

21a

(21b)This has become a fact of life, but it does not prevent us from fulfilling our responsibilities. The establishment of the desired condition classes will assist us in allocation of limited resources.

(21c)Maintaining all trails to the same level as found in the concentrated Class III areas is beyond the budgetary ability of the Forest Service. Class III areas endure the most traffic and are more susceptible to tread wear and erosion. Part of using the desired condition classes enables the Forest Service to set varying standards dependent on use received. If more user groups would volunteer their time to do trail maintenance, this would help alleviate the burden of trail maintenance.

to do these things, but with cooperative efforts by the USFS and interested user groups this could be accomplished

3 Proper placement will protect the surrounding area and prevent trails through boggy areas

4 Stream crossing can have less impact with a good bridge verses crossing the stream which will enlarge the area by bank erosion

5 Where needed corduroy type walk way installed wide enough to keep stock on it with a good "V" shaped encroachment with gravel at each end will help drain the water

6 The USFS will have to educate people that they will encounter large groups on the trails and try to encourage user groups to be tolerant of one another

The attached map has some areas that I feel need to be re-evaluated as to class designations
1 East Basin should not be a class I area the desired condition states "Lakes are generally not 21d
stocked" Almost every lake in East Basin is now stocked "There are few if any trails", with the 21d
major trail that connects Ottoson Basin with the Moon Lake trail head, it makes this a logical
place in time and distance for both hikers and horsemen to stop With this number of lakes
stocked with fish people will want to stay longer than the 1 or 2 nights that is being
recommended It seems this area would fit the class II desired conditions much better 21d
2 There is an area from just south of Anderson Lake along the USFS trail 121 to the pass going 21e
into Squaw Basin that could be class I There is only one lake that is stocked The trail is not a
major trail it is very rough and hard to find in places The east side is a long talus slope and the
west drops off steep into Fall creek
3 The area in the Little East Fork of Blacks Fork that is being suggested as a class III has no 21f
trails going through it Most of the lakes are stocked There are very few fire rings in the area
There is one old sheep herders tent platform This area could very easily be a class I area, but 21f
there is a sheep allotment in the area It fits into the class II the same as the rest of the Little East
Fork does
4 The area that is marked as class III in Right Hand Fork of Bear River around Nence and Priord 21g
Lakes should be a class II This area does not exceed the standard for campsite assessment ratings
on page 2-15
5 As I look at the preferred alternative map I have a question about the logic behind the three 21h
areas in the Duchesne River drainage They are the class II areas by Margo Lake and Allen Lake,
the other one is the class I that is completely surrounded by class III. Would it be practical to
chance the two class II areas one way of the other? This might be less confusing for the
wilderness users It will be difficult to manage the class I in this area with so much class III 21h
around it. It could get group size and overnight camping violations regularly

While I was a member of the LAC one gentleman indicated that he didn't care how many [illegible] if there were [illegible] that would be a natural way to eliminate people. I hope this is not how the USFS plans to manage the wilderness. I have often heard the statement " If all we have to do is

(21d)Existing conditions in East Basin may be closer to Class II than I. However, since the basin is outside an existing livestock allotment, it can classify as Class I. We feel the basin has the potential to meet Class I conditions and should be managed to meet that potential

(21e)That area is within the Fall Creek sheep allotment. As defined in the desired conditions (pg 2-3 through 2-5), Class I is defined outside permitted livestock allotments

(21f)The descriptions of the various classes have been refined (please be sure to refer to these descriptions). In many ways the area at issue does meet the criteria of the other classes however in our opinion present visitation levels to this area fits more closely with Class III

(21g)Again, as in the case above, this area does meet many of the criteria of the other classes. However, observed visitation levels fit more closely with Class III

(21h)The small Class II area around Margo Lake is changed to Class I. The Class II area around Allen Lake is changed to Class I to blend with the rest of Fish Creek and because it is topographically separated from the Class III area of Four Lakes Basin. Likewise, the Class I area will remain due to its relative inaccessibility

fight to keep using the wilderness, then I hope there is no more wilderness set aside." This seems to be one of the reasons why people in the State of Utah are against the wilderness.

Because of my love for the wilderness I would hope that common sense is used in making these decisions so that we can continue to enjoy the wilderness and our heirs can enjoy the as we enjoy it today.

Sincerely,

Jack Prescott

Jack Prescott
P.O. Box 486
Kamas, UT 84036

cc: Bernie Weingardt
Joseph Bistryski
Julie Hubbard
Gene Sears

September 16, 1996

Gayne Sears
Ashley National Forest Office
244 W Highway 40
Roosevelt, UT 84066

Dear Ms Sears

Thank you for answering my questions at the August Draft EIS open house in Salt Lake City.

My only comment concerning the EIS for the Management of the High Uintas Wilderness concerns the overall purpose of any adopted management plan. As noted in your draft, prior to about ten years ago most wilderness was managed primarily for the recreational benefits such wilderness could provide. More recently, many people have come to realize that the sustenance of wild ecosystems should be of paramount consideration. we have to be concerned about the long term cumulative impacts of wilderness visitors over time periods of many decades. 22a

With the above concept in mind, it seems to me that the preferred alternative would be the one which maximizes the amount and quality of wilderness within a wilderness area. According to your modeling and analysis this would be Alternative 3. While this would obviously have some negative impact on outfitters and some recreational users of wilderness I believe we must keep our priorities straight. 22b

The more logical extension of this argument would be the adoption of a management plan with a much higher percentage of Class I area and significant allocation of money and personnel to educate the public about the values and behavior expected in wilderness environs, and, where necessary, money and personnel to enforce a management plan designed to sustain the wilderness.

Finally, I would just like to say that there should be a lot more money allocated to monitoring both the health of wilderness and the use and impact that wilderness visitors are having on this valuable and irreplaceable resource.

Thanks for the opportunity to comment.

Sincerely,

Rick Van Wagenen
1922 Claremont Way, Salt Lake City, UT 84108

(22a)We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(22b)The intent for all the classes described in this document has always been to comply with the Wilderness Act of 1964. The descriptions of these classes have been carefully analyzed and reworded to ensure compliance with the Act. Over the years it has become evident that those wilderness experiences being pursued by our visitors do vary within the spectrum of "wilderness opportunities" thus the different classifications. Refer to the Record of Decision for the rationale behind the decision.

Ms. Gayne Sears
244 W. Hwy 40 (333-6)
Roosevelt, Utah 84066

September 14, 1996

Dear Gayne,

I enjoyed meeting you during the Forest Service's "open house" in August. I hope I'm not too late writing my official public comment and mailing it to you. My family and I left for our family vacation the last week of August. We flew to Portland and then drove down now to a tiny coastal town named, Yachats (Yaw-hots). We have been drawn to this great little piece of Oregon coast ever since we stumbled upon it five years ago. The state of Oregon passed a really good law (I'm not sure when) that says no one can clair ownership of the actual coastline. The beach belongs to the public. This has stalled and aborted many development projects and the Oregon coastline has avoided turning into visual blight. Well, enough about Oregon, let's talk about Utah. Let's talk about the High Uintas Wilderness.

Before I give you my "official comment" concerning the High Uintas' E.I.S. please remember my letter probably represents many, many people who didn't write letters to you ,who feel the way I do. I don't represent a special interest group. I represent me, Erica Wanggaard, ordinary housewife, artist and teacher living in Salt Lake City, Utah.

My impassioned plea: Please protect the wildness of the Uintas Mountains.

My official comment is: In the Class I areas please include all unGrazed sections of the High Uintas including the western end of the Uintas such as Naturalist Basin, Grandaddy Basin, Four Lakes Basin, Sgaw Basin,East Basin, Amethyst Basin, the Uinta River, the middle reaches of the Yellowstone River on the south slope and Beaver Creek to Burnt Fork. 23a

Concerning fishery management: Please make sure all Class I waterstate to managed for native aquatic species. Phase out the non-native recreational fisheries. I support the Yellowstone River Colorado Cutthroat Trout Refugia proposed by DWA. 23b

I support grazing in the wilderness be phased out during the next ten to twenty years to assure a safe environment for bighorn sheep and predators. 23c

I believe now is the time for the Forest Service to do their job and consider the HUs wilderness resource as the most important value when managing this incredible, irreplacable and wild place.

Sincerely, Erica Wanggaard, 3520 E. Roger Dr., SLC, Ut. 84124

Erica Wanggaard

(23a)Some areas not grazed and not in Class I do not have Class I values for reasons other than grazing. Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways: 1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16 of the DEIS). 2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas. 3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed. Important to this issue is the scale of soil and vegetation loss. Even in areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the impact of man's work substantially unnoticeable. Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17

(23b)This is the desire of the Forest Service and will be dealt with in the memorandum of understanding on fish stocking that will be drawn up between the Forest Service and the State

(23c)The wording "phased out" is in direct conflict with Congressional Grazing Guidelines which state "there shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly phase out grazing." The Congressional Grazing Guidelines clearly place this comment beyond the scope of the EIS

196

[illegible] Meadows Way
Grand Junction, CO 81503-2525

[illegible]

[illegible]
8136 Federal Building
[illegible] State Street
Salt Lake City UT 84138

Dear [illegible]:

Thanks for the opportunity to review the DEIS for the High Uinta Wilderness. I am glad to see the Forests moving on to get this [illegible] and Forest Plan amendments completed.

Before getting to specific comments, I will state my preference is for Alternative 3, especially as to its generic description, as [illegible] continue to reach for a high standard of wilderness [illegible] and management. 24a

[illegible] the description of the alternatives and management [illegible] for other than Alt. 5 lacking. The Alternative [illegible] NEPA analysis is to be the heart of the document. [illegible] in this document. Alternative 1 is [illegible] current conditions.... Alternative [illegible] pristine character of the wilderness. Both then [illegible] maximum service days for outfitted use. There is [illegible] wilderness management than outfitter use or a [illegible] of acres of "opportunity"!

Also, the title of the document states "High Uinta Forest Plan Amendment." Each alternative should contain the Forest Plan amendment which will be incorporated into the Forest Plan. 24b

It would seem the desired condition classes can be varied though various management practices. Trails now maintained can be less maintained or not maintained at all. As grazing allotments [illegible], these areas can go from Class II to Class I, etc. [illegible] stocking can be a criterion for Class I areas, [illegible] is a big difference between an area which has [illegible] stocking and an area which has cattle grazing.

[illegible] as DESIRED. To me this means this is [illegible]. Class II areas can move to Class I. [illegible] not likely changed since these are often the [illegible] and high use areas; however, camping in these [illegible], open fires not permitted, overnight stock [illegible] areas, etc. There are many management [illegible] reduce the impact of human influences. The [illegible] does not get specific (p.4-[illegible]).

[illegible], the Henry's Fork is described on pages 3-27 & 28. [illegible] "Finding solitude and a quality wilderness experience [illegible] quite difficult.... The drainage is very popular [illegible] groups." The next paragraph says "Rules or regulations ... so far have not been developed. However, fire closures above Elkhorn Crossing are being considered..." under

(24a) Preference for Alternative 3 noted.

(24b) The forest plan amendment is included in the Record of Decision.

[illegible] they should be considered under various alternatives. [illegible] groups like the Boy Scouts can be directed elsewhere [illegible] these kinds of groups. I could not find [illegible] direction in the proposal and the alternatives. [By [illegible] open campfires, even by outfitters, use may [illegible] finding a quality wilderness experience will [illegible]] 24c

[illegible] reduced outfitting, both stock and non-stock. One [illegible] pristine environment with outfitting but the [illegible] where the outfitting occurs. [By directing [illegible] away from popular lakes or trails, impacts [illegible]] [illegible] there is a big difference in impacts from [illegible] llamas or the use of 10 head of stock [illegible] 24d

[illegible] there has been considerable conflict regarding [illegible] lakes and the use of non-native species. [I too, [illegible] primary activity in wilderness but I am [illegible] have some lakes non-stocked and prefer [illegible] native, even if I have a hard time catching [illegible] are not just recreation areas so there should [illegible]] 24e

[illegible] the lack of direction for each alternative. [illegible] direction with regard to monitoring the [illegible] standards. Pages 2-[illegible] through 2-17 have the [illegible] in the direction once the standard is reached [illegible]] If [illegible] becomes scarce due to campfire use, [illegible] implemented? Restrictions may not be needed [illegible] monitoring, they may be needed in the future. [illegible] should be indicated. 24f

[illegible] great deal of work has gone into this plan but I [illegible] have a hard time understanding just what will be [illegible] are problem areas now but little indication of [illegible] to resolve the issues. The "Monster track" [illegible] the [illegible] River (p. 3-20) indicates a [illegible]. But, there is no corresponding action to mitigate or reduce the impact. Stream crossings are mentioned as being [illegible] for use. Maybe this is an area where small bridges [illegible] tradeoff to reduce the erosion.

[illegible] the overall picture but I feel more work needs [illegible] plan to give it the direction needed as a [illegible].

[illegible]

[signature]

[illegible]

(24c) It is probably true that use would drop in areas where campfires are not permitted. This occurred in Naturalist Basin. Closing one area to campfires will always result in the displacement of recreationists to other areas, as a result new areas will be affected. As managers, the Forest Service is committed to providing for the protection of the wilderness resource as well as providing opportunities for recreation. Wood collection should be managed and/or restricted to protect natural resources (pg 2-16). We are in the process of collecting the data support this standard. Visitor use is more effectively managed through education, public information, and use restrictions, rather than blanket prohibition of campfires in areas where the resource can accommodate campfire wood collection.

(24d) [illegible] or trends away from desired conditions as detected [illegible] under any alternative would prompt discussions of which of the [illegible] of available management practices to propose to correct problems. Some practices can be [illegible] administratively (such as asking visitors to locate camps away from [illegible]) [illegible] other practices may require site specific NEPA analyses (separate from this [illegible] EIS - p. 4-11) when direct alteration of the [illegible] is proposed.

(24e) Comments from the public and discussions at ID team meetings [illegible] fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4. The Wilderness Act of 1964, Section 4 (d) (8), states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish management in the national forests." The Forest Service is working with the State in developing a memorandum of understanding [illegible] roles, responsibilities and policies concerning fish stocking in the wilderness. At the present time the State only plants lakes 2 surface acres in size or larger, and they plant less than 50% of those.

(24f) Site specific management actions to reverse the trend will be [illegible] where the standard is exceeded or trending toward degradation.

[illegible] the High Uintas [illegible]

[illegible] a small section of the total wilderness [illegible] hold true for the complete area. [illegible]

[illegible] and outfitters. [illegible] 25a

[illegible] Class II areas are designed to be used by [illegible] Outfitters [illegible] 25a

[illegible] 25b

[illegible] 25c

[illegible] 25d

[illegible] 25e

[illegible] 25f

[illegible] 25g

(25a)Response to the above is in 2 parts as follows: (1) Condition Class, and (2) organized group recreation. Part 1: Class II areas were defined as most appropriate for outfitted activities in the desired conditions descriptions on pgs 2-6 through 2-8. After reviewing comments on the DEIS, we have added Class III areas as generally appropriate for outfitted activities also. Due to existing high use and social conditions on the verge of exceeding standards, specific areas in Class III (identified in the chart on page 2-18) will remain closed (no permits issued) to outfitting. Class I remains least appropriate for outfitted activities. The outfitted public is currently a very small percentage of total wilderness recreation use, however we understand that in certain drainages (Uinta, as you suggest) outfitted public use may compete with some general public use. Outfitter assigned sites are approved by the Forest Service with the objective of minimizing resource impacts and conflicts with the general public. In the past, Island Lake has been an assigned site for the [illegible] stock outfitter. Part 2: For this analysis, organized group recreation [illegible] Scouts in the HUW makes up a large percentage of overall wilderness [illegible] use. These groups have been and are targeted for intensive wilderness [illegible] and Leave No Trace training. In areas like [illegible] River, the Forest Service is seeing positive [illegible] with [illegible] behavior.

(25b)Programs [illegible] Scouting service projects [illegible] Leave No Trace [illegible] Emphasis has been directed at the scouting organizations [illegible] Efforts are being aimed at recruiting scouts to perform [illegible] amount of effort in trail maintenance and [illegible] the scouts in 1996.

(25c)Much work is needed to teach Leave No Trace [illegible] accomplished [illegible] cost prohibitive to mandate attendance and implement [illegible]

(25d)Preference for Alternative 4 [illegible]

(25e)According to the literature (Cole, 1990), popular guide books [illegible] 1995) and Leave No Trace publications (Harmon, 1995) [illegible] groups can cause greater resource impacts. The Class I desired [illegible] challenges groups who visit these areas to travel in small groups. [illegible] people and 7 stock will continue to be the standard to measure [illegible] (pg 2-15). If and when (through monitoring) this standard is exceeded [illegible] actions to restrict group size in Class I will be adopted. Stock [illegible] travel in Class I must accept the responsibility to travel [illegible]

(25f)We appreciate your endorsement of the desired conditions [illegible] for the HUW. Certainly wilderness visitor education has been [illegible] high priority for managers of the HUW. With completion of this planning [illegible] managers will have more time to focus on effective education [illegible] continue to be an important part of providing service for the [illegible] wilderness management objectives like clearing trails and [illegible] Both the general and outfitted public will be held responsible to [illegible]

groups. Managing the HUW using a class system will enable managers to focus on needed trail maintenance more effectively.

(25gdn some specific Class III areas (see chart on page 2-18) outfitting use remains unavailable due to present high use by the general public. But on a broad scale, if managers ever impose a quota on the number of visitors to the HUW, both the outfitted and non outfitted public will share the encumbrance

Wilderness Watch

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September 16, 1996

Bert Kulesza
Forest Supervisor
Ashley National Forest
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Received
Ashley National Forest

Dear Bert

We [illegible] providing these comments on the Draft EIS for managing the High Uintas Wilderness. Wilderness Watch has been actively involved in High Uintas Wilderness management issues for many years. We've submitted numerous written comments and participated on the LAC [illegible]. I've personally traveled extensively through the HUW, served on the LAC task force, [illegible] have actively participated in High Uintas issues since the late 1970's. Our [illegible] was a North Slope district ranger in the late 50's and early 60's. I encourage you to [illegible] our extensive input as support for the brief comments here. We won't bother restating [illegible] we've said in the past in large part because after reviewing the EIS we're convinced it would [illegible].

[illegible] tens of thousands of dollars, dozens of LAC meetings, and hundreds of [illegible] of citizen input have led to a remarkable decision to maintain the [illegible]. When Gary Macfarlane, one of the most knowledgeable and dedicated High Uintas [illegible] advocates, resigned from the citizens' task force in 1992, he wrote at the time [illegible] LAC process was being used to "justify the status quo." Wasatch-Cache Supervisor Susan [illegible] responded that "nothing could be less true." The draft EIS validates Gary's [illegible] out of Susan. Of course, she's not making the decision, but the [illegible] of continuity and consistency within the agency renders [illegible] public input and High Uintas Wilderness advocacy irrelevant. We note that the "list of preparers" includes only [illegible] Forest Service employees who were active with the past 5-10 years of citizen involvement. [illegible] the recommended course of action doesn't reflect the concerns that have been raised relative to High Uintas Wilderness management.

[A [illegible] with the Uintas has witnessed the overgrazing in the West Fork Black[illegible] [illegible] devastation across the North slope along the sheep driveways, counted the hundreds of [illegible] in Granddaddy Basin, knows all the [illegible] carnivores are gone [illegible], knows the native fishes have been replaced by exotic species, knows the biologically [illegible] lakes are being managed as sport fisheries and knows the fire management [illegible] the long since discredited "out by 10 o'clock" policy.] It's hard to get enthused [illegible] that maintains this status quo. It's also hard to imagine that this is the vision the [illegible] Wilderness system had in mind. 26a

[[illegible] issues have been ignored in the DEIS, thus even if the Forest Service selects the [illegible] protective alternative it will do little to improve or even maintain existing wilderness [illegible].] Fire management, fish stocking, livestock grazing and predator control are major [illegible] affecting the High Uintas Wilderness, yet all are ignored or marginally addressed in the EIS. Wilderness is not simply a place to recreate, it is also an area where natural processes [illegible] conditions, and wilderness character must be preserved. Thus, wilderness management planning needs to address such issues as fire management and other natural disturbance regimes, vegetation (including exotic species), wildlife (including exotic species [illegible], indigenous species recovery, and habitat), and the interplay of all of these values 26b

(26a)Where problems occur, they need to be dealt with. Where issues are beyond the scope of this document, they are not addressed here. As explained in the document, livestock grazing is to be addressed in Allotment Management plans in accordance to Congressional Grazing Guidelines as given on page 1-11 of the EIS.

Although the Forest Service is highly interested in management of fish and wildlife species, that responsibility clearly lies with the state of Utah. This responsibility requires agreements with UDWR as explained on page 1-12. It is within the scope of this document to address habitat for fish and wildlife. Desired conditions given in the document are consistent with favorable habitat for native species.

The proposed standard to allow prescribed natural fire within the wilderness is discussed on page 2-14. The 10 o'clock policy is not adopted. The current fire management policy that has been in place since the early 1990's is explained on page 3-7 under affected environment. This explanation is not a statement for future management. Future management is directed on page 2-14.

(26b)This plan sets the stage for the development of a fire management plan for the High Uintas which will allow fire to play its natural role in the dynamics of the ecosystems in the wilderness.

This is an integrated plan. It establishes desired conditions, standards and criteria for evaluating and monitoring the entire spectrum of resources that make up the wilderness. It focuses on basic resources: vegetation, air quality, soils, wildlife and fisheries habitat parameters. It also sets indicators and standards for recreation use that is integrated with the basic resources.

The fact that the plan does not specifically address grazing, fish stocking and animal damage control does not mean the plan lacks integration. All the basic resource indicators and standards are applicable to each of these uses. The reason we are not dealing with these specific issues relates directly to law. Grazing is allowed in wilderness and any adjustments to the grazing program must be made in a context other than wilderness (Grazing Guidelines). Therefore, this plan is not the proper place to discuss the grazing program other than to integrate it with the vegetation and soil standards. The allotment managemment plan is the proper context to address grazing issues.

The Wilderness Act is specific in that it does not alter in any way the authority of the Division of Wildlife Resources to manage wildlife populations. The management of wildlife populations to meet wildlife habitat desired conditions and standards must be a cooperative effort. Animal Damage Control (ADC) activities are the responsibility of the Animal and Plant Health Inspection Service (APHIS), again by law. Thus, we must work cooperatively with this agency to insure that wilderness values are protected when ADC activities take place.

Wilderness Watch

[illegible] Wilderness [illegible] In Wilderness Management, the most comprehensive text on the subject, [illegible] this point as a key principle of wilderness management:

Principle 2: Manage Wilderness As A Composite Resource, Not As Separate Parts

> [illegible] standpoint, one important attribute of the wilderness resource [illegible] among all its ecosystem parts: vegetation, water, forage, wildlife [illegible]. Wilderness is a composite resource with interrelated parts, and its management [illegible] focused on the whole, not on those component parts. For wilderness, therefore, [illegible] not develop separate management plans for vegetation, wildlife, and recreation. Rather, one plan must deal simultaneously with the interrelationships between these and [illegible] component parts of the resource. Hendee, J., G. Stankey, and R. Lucas, [illegible] Management [illegible]

In the High Uintas, the Forest Service is letting local politics rather than professional [illegible] drive the planning process. Wilderness doesn't have a chance.

[illegible] the existing condition for the ungrazed lands in Boundary Creek and [illegible] Beaver Creek east to the Wilderness boundary. Both of these areas [illegible] Condition Class I; they show no more human impacts than other Class I areas [illegible] grazing allotments. Managing them as Class II contradicts Forest [illegible] Wilderness toward attaining the highest level of purity in Wilderness [illegible]. Alternative 1 allows these areas to degrade to Class II standards. 26c

[illegible] all of the ungrazed areas in the Wilderness including the [illegible] Basin, Naturalist Basin, Four Lakes Basin, Squaw [illegible] River and the ungrazed Yellowstone River. 26d

[illegible] outfitting and guiding [illegible] impossible to [illegible] the "needs" [illegible] EIS and either of those to the proposed action. The "needs" analysis [illegible] demand doesn't constitute a public need. The EIS shows that [illegible] demand since most outfitters aren't using their allocations [illegible] non-stock service days. But the proposed action is to [illegible] stock use service days by [illegible] percent and non-stock service days [illegible] that outfitters expect the market demand [illegible] that need is not market driven. The Wilderness Act [illegible] commercial activity in Wilderness for obvious reasons. The DEIS [illegible] significant increase in commercial use. 26e

The DEIS [illegible] regulators (Forest Service) and the regulated industry [illegible] partners. It's more like collusion. Partners look out for each other's interest. [illegible] the "partner" of Wilderness looking out for its interest, not the interest [illegible]. We don't know how else to explain why at a time when wilderness [illegible] are being [illegible] and management/monitoring funds are declining, the Forest Service is [illegible] increase in commercial service days. The DEIS attempts to hide [illegible] by portraying only the last couple years of historical commercial use data. The DEIS should include the trend in commercial use since Wilderness designation so the public and [illegible] can appreciate the incredible increase in commercial use that has occurred. 26f

[illegible] should not be allowed to occupy any site longer than the 14-day limit that applies to [illegible]. We [illegible] by the argument that moving camp sites will require more [illegible] 26g

(26c)Boundary Creek is outside of the scope of this document [illegible] Wilderness.

We'll be the first to admit the descriptions are subjective. When we [illegible] this area, it was difficult to make the call between a Class II or I. In many respects it does meet Class I, however, in the description it says "Encounters with other groups and rangers are rare." The use in this area tends to be sporadic. During the hunting season, use in this area is relatively high. Encounters with other groups are common.

(26d)Some areas not grazed and not in Class I [illegible] for reasons other than grazing. Designation of Class III is intended to [illegible] management of the High Uintas Wilderness in the following ways:

1. It recognizes a historic pattern of use [illegible] trail heads where the majority of users are first time or infrequent visitors and [illegible] do not necessarily seek higher [illegible] pages 3-15 and 3-16 of the DEIS.
2. It can help divert many of the above group [illegible] which will facilitate solitude in those areas.
3. It provides an opportunity [illegible] challenging [illegible] educational programs where they are most needed.

Important to this issue is the scale of soil and vegetation loss. [illegible] areas identified as class III, these losses on a watershed scale [illegible] necessarily beyond the concept of a landscape that [illegible] been affected primarily by the forces of nature, with the [illegible] substantially unnoticeable.

Soil and Vegetation loss and other impacts [illegible] standards as given on pages 2-9 through 2-17.

(26e)Market generated demand does not constitute a public need [illegible] on protecting the resources while providing for use and enjoyment [illegible] National Forests. The permitting of outfitter/guides is a [illegible] members of the public that require and/or wish to use [illegible] means to enjoy the wilderness. Outfitter guide use [illegible] days" and is assisted public use. As the human population [illegible] Uintas Wilderness increases, there will undoubtedly be an increase [illegible] public and assisted public use of the wilderness.

(26f)Records are incomplete, but the following numbers reflect [illegible] in historical files for actual use of outfitters and guides in the [illegible] of the High Uintas since 1980.

1980-81	200-700 service days/yr
1982-85	25-75 service days/yr

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Wilderness Watch

Wilderness, the same groups and agencies that fought against Wilderness designation and apparently lost in 1984 are now being handed their anti-wilderness victory by the Forest Service.

I hope we've adequately expressed our disappointment with this plan. We won't ever give up on the High Uintas Wilderness, but we hold out very little hope that the Forest Service, through this plan, will play a leadership role in its protection.

Sincerely,

George Nickas
Policy Coordinator

(26k)Tent platforms are being phased out as equipment is purchased to support crews with lighter and mobile equipment. Many of these sites have been in place for thirty years and it will take a few years to eliminate them.

(26l)We agree, in some basins there are duplicative trails that will be considered for closure and rehabilitation. However most of the major access trails to each drainage are not considered duplicative. They may end up at the same destination (Swasey Hole trail and Five Point Lake trail both end at Five Point Lake), but they provide access to different wilderness opportunities along the way. These will be maintained.

(26m)The Wilderness Act of 1964, states in Section 4 (d) (8), that, "Nothing in this Act shall be construed a affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish on national forests." The state has historically stocked fish in what is now the High Uintas Wilderness and has the right to continue. They presently stock only lakes over 2 surface acres in size which they have historically stocked. They stock less than 50% of the lakes 2 acres in size or larger. The Forest Service will be working with the UDWR in preparing a memorandum of understanding for fish stocking in the High Uintas.

As for all species, the Forest Service favors indigenous (species historically found in an area) first, and second, native species (species native to the United States), over exotic species (species not native to the United States). It is the States responsibility to make the determination as to which species are native or indigenous.

(26n)The State has the responsibility to make the determination as to which wildlife and fish species are native or indigenous. They have made the determination and the statement in the DEIS (3-7) reflects that determination.

High Uintas Preservation Council

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SEP 1996
Received
Ashley National Forest

September 15 1996

Bert Kulesza
Forest Supervisor
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Vernal Utah 84078

Bernie Weingardt
Forest Supervisor
Wasatch-Cache National Forest
Salt Lake City, Utah

Dear Bert and Bernie

Please accept these comments on the Draft EIS for Management of the High Uintas Wilderness.

Process/History

The [illegible] story of this effort is missing in the DEIS and should be part of the analysis. I spent a decade leading the effort [illegible] of the High Uintas Wilderness. In 1988 I wrote a letter to Clark Tucker, then Roosevelt District Ranger, pleading with him and others in the Forest Service to get serious about initiating a wilderness management/planning effort for the Uintas. [illegible] then there had been a series of half efforts and starts and stops (does anything ever change?). Clark and many others in the Forest Service agreed a meaningful and updated planning effort was needed. Somewhere in the agency resistance continued.

The wilderness was not taken seriously and decisions continued, almost all of them questioned/challenged by many wilderness supporters (opponents of wilderness should not be major players in this discussion since this is not a wilderness designation process) because they were contrary to the wilderness context and continued the piecemeal management of the wilderness by two forests and five districts. All of this, of course, was contradictory to wilderness guidelines and [illegible] promulgated by the Forest Service. Of course, I noted this without response at numerous forest, region-wide wilderness conferences over the years and as an instructor at the annual Utah State University Outdoor Recreation [illegible] for Forest Service and other federal land management agency folk.

When the LAC process was finally initiated in 1991 we all recognized we were in for a rocky, but hopeful, ride. Concerns were expressed about too many environmentalists on the LAC (interestingly, the environmental representatives did not complain [illegible] of the number of participants of other citizens involved in the effort) and numerous communication/discussion methods were attempted to try and get participants to recognize the need to work together and adopt a consensus form of decision making.

The participation of two representatives from the Utah Division of Wildlife Resources (UDWR) proved to be very disruptive because they insisted wildlife issues were the sole purview of UDWR, strenuously opposed the representation of some environmental representatives and suggested their role as government representatives allowed them more authority in [illegible] task force. It is important to remember the LAC effort was sold as a "Citizens LAC Task Force" from its inception. Environmentalists argued governmental entities did not belong on this citizens task force.

[illegible] late in the process UDWR wrote a scathing letter (February, 1993) to the Forest Service complaining about [illegible] the issues noted above. We resigned shortly after the release of this letter. By then a number of environmental representatives of the task force had resigned, partly in response to the failure of the Forest Service to properly respond to the underhanded efforts by UDWR, and partly in response to Forest Service decisions that some of the most crucial issues would not be dealt with in this wilderness management planning effort, despite earlier agreements by the task force and the Forest Service that, although unresolved and contentious, they would be dealt with as legitimate issues.

[illegible] surprise what those contentious issues were: management of lands adjacent to the wilderness, outfitting and guiding [illegible] fish and wildlife stocking and introduction, and grazing/range management. Of these disputations, outfitting and guiding was carried forward as an issue. Various excuses were shoved down our collective throats for the others. Grazing and range management were accepted by the larger groups as an issue to be dealt with outside of this process but it still should have been registered as a strong concern with some guidance in the wilderness management plan effort. This is particularly true since livestock interests play such a significant role in the DEIS analysis--it is an amazing (intended?) blind [illegible] on behalf of the Forest Service.

The point is, Bert and Bernie, that after the better half of a decade of false starts, legitimate starts, dozens of formal and

[illegible] informal meetings and discussions, various forms of consensus and realization that the status quo wilderness management needed to be addressed and altered and that significant issues existed, the Forest Service has proposed a wilderness management plan alternative that "maintains current conditions across the wilderness except in Naturalist Basin and the west end of the [illegible] where [illegible] directs managers to bring that area up to wilderness standards."

The plan says (with a small exception, and that exception is not pushed very far) the wilderness conditions on the Uintas are where we want them to be. But, Bert, that is not what the citizens task force suggested. That is not what Forest Service wilderness rangers note. That is not what forest planners and wilderness managers note. That is not what is in the files of the Forest Service related to wilderness management.

This simply appears to be a document that was given up on in order to get it done, paid for and out of the way. I know you will say that is not the case, but for the life of me I can't see this process as a meaningful effort. Significant issues were [illegible] at the status quo (outfitting and guiding) despite the rationale to move things "forward." The Forest Service [illegible] magnificent wilderness is nothing but the past condition. Doesn't make sense.

There were opportunities to deal with wildlife management in the context of [illegible] mountain goat introductions and [illegible] fish stocking. There were opportunities to deal with outfitting and guiding. There were opportunities to really [illegible] the non-recreational values of wilderness, the ecological ecosystemic values of wilderness, if you will, by pushing the Class I opportunity class out to the areas where grazing does not occur. These opportunities have been raised time and time again by wilderness supporters. Why they have been rejected remains a mystery. Indeed, dealing with these issues would have been more difficult and time consuming. But this plan could have provided the umbrella guidance to bring the [illegible] together over the next 2 or 3 years to "negotiate" solutions to these complicated wildlife and grazing issues [illegible] the Forest Service and this plan have failed again as leaders in ecosystem leadership stewardship. 27a

There is an interesting [illegible] paradox in this process. There was a time after passage of the Wilderness Act when the Forest Service proposed a "purist" concept of wilderness. Unfortunately the agency confused the purism of wilderness management with the allocation of wilderness, arguing for standards of allocation that were beyond the intent of the Wilderness Act. Many commentors and historians noted the concept was designed to restrict the size of the National Wilderness Preservation System (see Nash, Wilderness and the American Mind; Frome, The Battle for Wilderness; Wilkinson and Anderson, Land and Resource Planning in the National Forests; or The Forest Service History Series by Dennis Roth, The Wilderness Movement and the National Forests 1964-1980). The paradox occurs today with the Forest Service now allowing for a wilderness system to move in the opposite direction of purism by allowing activities that clearly denigrate the ecological integrity of the wilderness context. And, of incredible irony, this all occurs during a time in which wilderness is more than ever focused in an ecological biological diversity context rather than the traditional simple primitive recreational [illegible]. 27b

Opportunity Classes

The most confounding aspect of this DEIS and plan is the allocation of opportunity classes. First, the DEIS is totally lacking in proposing a rationale for the particular allocation of opportunity classes not only in the proposed alternative, but in all of the alternatives. There must be a reason for a 29% C I allocation, a 58% C II allocation and a 9% [illegible] III allocation in the proposed alternative. Why that particular allocation? What issues does it meet, solve, address? Why [illegible] this the desired future condition? 27c

To even the casual observer it seems more than odd that the Forest Service would want 9% (~41,400 acres) of the [illegible] wilderness to remain in the lowest wilderness class still meeting the legal standards of wilderness designation. Why [illegible] the desired future condition for the Uintas, presumably for the life of the next forest planning [illegible] years? What [illegible] issues/concerns are met by having ~41,400 acres in this low class? 27d

[illegible]

The effort of [illegible] should be to move the wilderness "forward" attaining the highest level of [illegible] wilderness [illegible] DEIS [illegible]. Not only is that the right thing to do within a wilderness context, and then meet the issues [illegible] within the wilderness context, but it is the wilderness management [illegible] and [illegible] for example, see DEIS [illegible]. It is what the Forest Service is supposed to be doing [illegible] through nearly a decade of planning and arrive at the status quo management of the High Uintas Wilderness [illegible] putting the wilderness toward attaining a higher level of wilderness purity. That is why this alternative should [illegible] the proposed action [illegible]. 27e

[illegible] meetings a determination was made and obviously adopted by the Forest Service that [illegible] areas where there were no active cattle or sheep grazing [illegible]

(27a) Although brief, desired conditions defined in the EIS equally address ecological/ecosystem values and social values. The wilderness-wide desired conditions that apply to areas with and without grazing allotments provide focus and direction based on ecological/ecosystem values. This programmatic document is not a detailed plan, but it does provide umbrella guidance. After 6 or more years of "negotiation" related to the development of the EIS, it does not seem greater resolution to the complicated wildlife and grazing issues will be achieved by 2 or 3 more years of negotiation. Two or 3 more years of negotiation seems especially unrewarding in view of the very strong direction given in the Wilderness Act and subsequent Congressional Grazing Guidelines that grazing shall continue in wilderness where it was established prior to the effective date of the act.

(27b) Desired conditions described in the document determine appropriate [illegible] as determined in the 1964 and 1984 Wilderness Acts [illegible] and support natural processes, natural appearance [illegible] of life.

Although class III may not fit everyone's opinion of pure wilderness, the desired condition given in the document is supported by wording in the Wilderness act in which Definition of wilderness includes lands that generally appear to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Definition of wilderness in the Act also includes "has outstanding opportunities for solitude or a primitive or unconfined type of recreation." For those who do not feel Class III can provide this, 91% of the wilderness in classes I and II provide greater opportunity.

(27c) The preferred alternative mix of Classes represents a spectrum of desired physical, biological and social conditions mandated by the Wilderness Act.

(27d) Class III still meets the definition of wilderness. [illegible] a demand for this type of wilderness experience.

(27e) No support for Alternative 1 is noted.

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The Forest Service doesn't seem to have the same commitment to utilize citizen based alternatives that implemented this particular decision. The question of integrity reigns rather significantly here, doesn't it?

While Alternative 3 is touted as the "maximize protection of wilderness resources" alternative, the actual alternative submitted by me as a member of that committee showed all areas outside of domestic grazing allotments as being C 1. I was shocked to see the Forest Service not utilize this alternative because it does represent a maximization of wilderness values/resources. I would like to know why it wasn't used and how the agency can portray the extant Alternative 3 as the maximize wilderness values alternative when it isn't, even in the context of the citizens task force. 27f

Since I've submitted the alternative during the citizens task force and during one of the scoping processes, I'm sure I don't need to do it again. I'm sure you've carefully filed it away and can access it for reference. Alternative 3 should be altered to reflect this view of the High Uintas Wilderness, which includes all of the existing C 1 areas in Alt. 3 as well as the represented C II areas on the Middle Fork Beaver Creek, McCoy Park/Fish Lake area, the Rock Creek/Fall Creek corridor, Naturalist Basin and Granddaddy Lake corridor. 27g

It is incongruous to have this alternative harboring C III areas. It is the maximize wilderness resource/values alternative and should harbor no opportunity classes that do not maximize these values.

Also, since it would be equally incongruous to have alternatives that are not dedicated to "attaining the highest level of purity in wilderness," then no alternative should harbor any more C III than the extant condition (which is basically Alternative 1). The Forest Service can't be in a position, even in the NEPA context, of suggesting wilderness be managed outside of the agency's legal policy constraints. This represents a management paradox. 27h

Alternatives 1 and 5 are basically the same alternative as noted in the DEIS with the exception that Alternative 5 is presented in a context outside of the LAC opportunity class definition. Thus, it serves no baseline analytical purpose since it isn't [illegible] in a context meaningful to this analysis. It also skews the range of alternatives in that 40% (2 of the alternatives) are presented as basically the same alternative.

[illegible] should be much simpler than recommended. This is pertinent for clarity to users and management efficacy (manageability, to use a word the Forest Service often uses to attempt to eliminate a roadless area from being considered for potential wilderness designation). To have C IIIs in the middle of C 1s or C IIIs accessing C 1s is tantamount to creating confusion in expectations for users and will create benign management as this confusion will be profound. You can't argue the need to constrain user numbers and behavior in a significant manner when a C III area of consequence, either a trail corridor or a lake basin, creates the proverbial donut hole in the middle of a C 1 area. You will also denigrate the voluntary C 1 user decision and trip into a C 1 area if those users are subjected to more liberal C III standards and opportunities. 27i

[illegible] the proposed alternative is seriously flawed from a management user perspective in that it is filled with tiny C 1s amidst larger C IIs (Granddaddy/Jean corridor, East Basin, Hyatt Lake, etc.) or is punctured by C IIIs within C 1s (Naturalist, Atwood, Smiths Fork, Henrys Fork, Middle Fork Beaver, Island, Kabell, etc.). Instead of a topo map and your [illegible], users and wilderness managers will need to carry the damn wilderness management plan and opportunity class maps with them and alter their behavior (drop off a few users or pick up a few, etc.) within not only miles but yards. It violates common sense and management principles. 27j

So many unanswered inconsistencies dominate the opportunity classes that it is virtually impossible to understand the management philosophy behind the proposed preferred alternative. Why is Margo Lake a C III and a few dozen feet away is [illegible] Lake [illegible] C 1? Allen Lake is a C II yet the rest of the Fish Creek and W. Fork Rock Creek is a C 1. Some of Naturalist Basin is C [illegible] but Hyatt Lake, Rocky Sea Pass and the country east and south of Everman Lake (C III) is a C 1. 27k

[illegible] any opportunity class, means portrays the same context across the wilderness, how is it that the Middle Fork Beaver [illegible] portrays the same sense as the Highline Trail corridor? It is equally fascinating that [illegible] [illegible] these lakes is a C II. Why is that? 27l

The point of [illegible] specific examples is to show the [illegible] in the DEIS for why allocations were made in the manner expressed is totally lacking and a [illegible] within the NEPA context, not to mention practical common sense! To a casual user observer of the High Uintas Wilderness there seems to be no way Middle Fork Beaver and the Highline Trail could be within the same [illegible] opportunity class. The same can be said of the 600 or so acres on the west side of the upper East Fork of Blacks Fork. And [illegible] the Forest Service, in its infinite stewardship wisdom (I mean that as cynically as I can muster), has placed Kings Peak, the highest in Utah, one of the highest in the Intermountain West, one of the highest peaks in the West, a classic deep wilderness peak, in the [illegible] opportunity class, the same as Granddaddy Lake, Scudder Lake, or Kidney Lake [illegible] 27m

[illegible] in the DEIS and raised numerous times thus far in this comment, why the Forest Service wants Kings Peak to be a C III? Why should Squaw, Four Lakes, Granddaddy or Naturalist Basin be C III? What [illegible] Atwood, Five Point, Island, Kabell, Amethyst, etc. to be the lowest wilderness opportunity? What about the [illegible] lakes straddling the western bench of the Little East East Fork? What wilderness opportunities [illegible] the entire Henrys Fork and Smiths Fork in the lowest wilderness opportunity setting? In fact 27n

(27f & g) The map you submitted during the scoping phase of the NEPA process does define more Class I than Alternative 3. There are three reasons the map you submitted does not look exactly like the map presented in Alternative 3. First, your map included an area within a livestock allotment in Burnt Fork. Second, as defined in the desired conditions, reservoired lakes are found in Class III only, therefore the dams in Lake Fork, Yellowstone and Uinta drainages were changed to Class III. And Third, areas in Naturalist Basin, Grandaddy Basin and lower Uinta were changed to either Class III or II. The Interdisciplinary team decided the Forest Service could not effectively close these areas to large numbers of wilderness visitors in order to move the area to Class I standards. And we felt this type action would ultimately be detrimental to the more pristine areas in the HUW due to dispersal of increasing use.

Given the sideboards of active grazing allotments and reservoired lakes, we feel Alternative 3 portrays the maximum amount of Class I, and the least amount of Class III.

(27h) The design of alternatives attempts to respond to varying degrees to one or more key issues or concerns (detailed in chapter 1). Issue 1 seems to capture the intent of "attaining the highest level of purity in wilderness." Selected management indicators used to compare alternatives relative to [illegible] do not relate to the amount of Class III designation because that designation alone does not imply an unsatisfactory wilderness condition, but only a different condition than to be expected in Class I and II areas.

(27i) Complexity is inherent in ecosystem management. Most users will not be affected or have any need to be exposed to the actual management plan. Resource specialists are expected to be scientific in their monitoring and analysis. The disciplines often require a degree of complexity to have valid data to evaluate. The opportunity classes help wilderness managers to allocate resources for data collection. The users are not likely to be directly affected with the exception that Class III areas will receive greater attention.

(27j) We attempted to design Class boundaries congruent with topography rendering the lines you see on the map as manageable and sensible.

(27k)(XX) Due to the lack of topographic barriers (resulting in management difficulties) between Margo Lake and the rest of Grandaddy Basin, the small Class II area around Margo Lake is changed to Class III. The Class II area around Allen Lake is changed to Class I to blend with the rest of Fish Creek and because it is topographically separated from the Class III area of Four Lakes Basin. As for Naturalist Basin, historic use patterns in this highly popular area helped determine Class designations. The Class I designations in this area reflect current pristine conditions. In order to maintain these conditions, they will remain defined as Class I.

what wilderness user, wilderness value(s) or wilderness management opportunities are created by having any C III region?

In the wilderness context, given the regulatory framework, not to mention common sense, why does the Wasatch and Ashley National Forest want to allocate/create low expectation, low opportunity class wilderness? The long term expectations become hard to break through, thus setting a standard of low wilderness expectations. It is understandable, given the assumptions in the planning process, that wilderness harboring domestic livestock grazing could be allocated in C II. And of course it is proper that as much of the wilderness be designated as C 1 as possible since that is the direction of wilderness management. But the plethora of C III allocations in this DEIS are troubling because they are not tied to problem solving, value resolution or creation of wilderness opportunities or values. It just doesn't make sense. 27o

On top of all of this, it is routinely noted that within C 1 areas all system trails and a 1,320 foot corridor will be automatically allocated as a C II or lower. Why?

Outfitting/Guiding

[illegible] with respect to wilderness outfitting and guiding along with numerous meetings, dozens of EAs, CEs [illegible] outfitting plan in the Ashley National Forest and we got the status quo thrown in our face.

[illegible] that, again, it is hard to formulate comments because the discussion in the DEIS is so vague and contradictory. The DEIS discussion starts out by noting wilderness outfitting and guiding is "authorized only if there is a documented need for the services." The reader is directed to this analysis in Appendix A which defines public need not as an outfitter's desire for a permit or "market generated demand (solicited calls/letters)," but as a "need considered essential or required for the well being of the public and to meet the intent of the Forest's mission to manage and protect wilderness resources for public safety and provide high quality public recreation services." It goes on to note commercial outfitted use is "permitted only to help achieve the mission of the Forest Service."

Appendix A then sets up a series of evaluation criteria to assist in defining this "public need." So far, okay! The conclusion of Appendix A, apparently based on the analysis in the DEIS (this is totally unclear), then violates the definition of public need in the DEIS and Appendix by saying the use of outfitter and guides services is essential because of the large size of the wilderness, complicated trail system and ***"expressed public interest"*** (emphasis added). 27p

The latter is not to determine public need as plainly noted. The other two were not even discussed in the DEIS. This also represents another interesting dichotomy: the measurement indicators in the DEIS with respect to the outfitting and guiding issue have no connection or correlation, except in the general definition, to the evaluation criteria in Appendix A. In fact, the measurement indicators are really justifications for outfitting and guiding, not an analysis of the need for outfitting and guiding. It is an absurd twist in logic, substance and process. It simply does not belong in a professionally produced wilderness management plan. 27q

The issue [illegible] raised in the scoping process all the way back to the citizens task force have been the rationale for outfitting and guiding and its subsequent impacts upon the wilderness resource. Conveniently, the Forest Service has glossed over this basic substantive issue and the secondary context of that issue (impacts of outfitting and guiding) and [illegible] outfitting and guiding in the most convoluted and biased manner I've seen in a long time.

The indicators have got to be consistent with the evaluation criteria in the Appendix in order to determine in a rational and [illegible] manner the public need for outfitting and guiding in the High Uintas Wilderness, which clearly has not been [illegible] in the DEIS, and the impacts from outfitting and guiding on the High Uintas Wilderness resources [illegible] [illegible] in the DEIS analysis. 27r

Measurement indicator [illegible] "Economic effects on outfitter operations" is clearly not part of the analytical structure determining "public need." If the Forest Service decides to measure or test outfitting and guiding in the High Uintas Wilderness against how much money an operator makes, the agency has already set in motion a spiraling increase in outfitting and guiding and has tied its hands in an effort to reduce or restrict outfitting and guiding. That is why the Appendix [illegible] public need can't be determined in this context. In the context of wilderness management, the guidelines and policy [illegible] handbook, directives [illegible] uses are to be subdued so that wilderness values dominate. Economy, convenience and commercial value are not the test (see DEIS pp. 1-2 to 1-5). This indicator has no place in the analysis. 27s 27t

The DEIS alleges outfitting and guiding assists wilderness managers and helps achieve the Forest Service mission with respect to wilderness management. For this allegation to have any measurable merit within the planning and NEPA context it is imperative the DEIS document those concerns. Simply stating it is so is not documentation. For example, how do the two stock outfitters and guides on the North Slope, both very small, according to the DEIS, and both associated almost exclusively with hunting and fishing, add to achieving the Forest Service mission and meeting wilderness management needs? 27u

An almost pathetic component of this outfitting and guiding analysis is the economic analysis. The DEIS notes that somewhere between $153,000 and $329,000 (depending upon the multiplier utilized in Wyoming and Utah) was added to the regional economies in Utah and Wyoming by the outfitting and guiding groups. Of course, for such an analysis to mean something these figures need to be compared to the value of the regional economies whereupon these figures get lost. 27v 27v

(27l) At destination points, such as lakes, groups will concentrate. The potential for encountering other groups is almost twice as high here than on the trail. On the trail, generally speaking, half the groups on the trail at any one time, are moving in the same direction.

(27m) Your comment is noted. Refer to the rationale in the Record of Decision.

(27n & o) The Forest Service recognizes the fact that wilderness visitors do not all seek the same kind of wilderness experience. Its quite obvious that some areas are Class III because of their popularity and the probability of encountering other groups. The majority of our wilderness visitors are using these areas and they have a legitimate right to have this opportunity. There are also those users seeking an even more remote and solitary type of experience. Their demands are also legitimate. The wilderness must be managed for a wide spectrum of wilderness opportunities.

What you suggest is for the Forest Service to manage for a select minority and not to provide a wider spectrum of wilderness recreational opportunities. We believe the desired condition description of Class III meets the intent and the letter of the Wilderness Acts. The description has been reworded to ensure this.

(27p) It was an error to use "expressed public interest" in this context. The wording has been changed to read: Based on 1) managers need for assistance in accomplishing wilderness management objectives, 2) the need to provide for public safety and, 3) the need to provide high quality public recreation services, the use of outfitter and guide services is essential to the stewardship of the High Uintas Wilderness.

(27q & r) Measurement indicators were used to compare alternatives [illegible]. For example, use of "economic effects on outfitter operations" on page [illegible] is not intended to analyze public need for outfitting and guiding in the High Uintas Wilderness but is used as a measurement indicator to compare the alternatives. Existing operations are required to meet certain standards of quality and safety in serving the public desiring their services. These requirements are best met when the operators are allowed to make a reasonable profit.

(27s) Economic effects on outfitter operations is not a factor in determining public need. The use of "economic effects on outfitter operations" on page [illegible] is not intended to analyze public need for outfitting and guiding in the High Uintas Wilderness but is used as a measurement indicator to compare the alternatives.

(27t) Economy, convenience and commercial value were used only to compare the effects of the alternatives to fulfill NEPA requirements, irrespective of wilderness management philosophies. However, a focus of this plan is to obtain better information on the uses in the wilderness. Using this in relation with

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[illegible] since a number of the operators have their base in Wasatch Front [illegible]

[illegible] public need exists is whether non-wilderness lands are available. In every [illegible] outfitters provide opportunities for non-wilderness outfitted trips for everything from packing to [illegible] hunting. This analysis must be part of the DEIS proper for full public review, scrutiny and analysis to [illegible] importance of wilderness outfitting within the High Uintas in the context of meeting the public need [illegible] procedural and substantive errors in the DEIS and Appendix A which deals with economic effects [illegible] "market generated demand."

[illegible] public need is noted in the DEIS - the existing allowed permit numbers are rarely met right now [illegible] the extant condition to increase. The Forest Service seems to be saying, as a desired future [illegible] and guiding, without having to say it in the DEIS as part of a publically accountable decision, "we [illegible] to increase above the actual existing use levels." The DEIS notes most of the outfitters expect use [illegible] to increase. Isn't that convenient? As a professional resource management agency, you [illegible] to project higher future use on public lands without some level of corroboration. Of course, [illegible] use will increase, they will lose substantial amounts of important income if you cut them back in any [illegible] impacts will be inconsequential. Please, give all of us a break. 27v

[illegible] with the standards and indicators as they interplay with the opportunity classes [illegible] of people and 7 stock, yet for all other classes, the figures are 14 and 15. But because of the [illegible] classes most outfitters will be travelling between and through opportunity classes. This can be [illegible] consistent 7 people and 7 (or 8) stock. This is what many of us suggested during the [illegible] would be consistent with the wilderness management literature which notes consistently [illegible] impacts than smaller parties. And by doing this it would help bring the C [illegible] This would be a wise thing to do. 27x 27x

[illegible] the guiding principle within the Forest Service. [illegible] as I've noted in this comment to make them more geographically based and [illegible] would make the implementation of these standards and indicators easier not to mention [illegible] will be told by the Forest Service that it is acceptable to violate the 7/7 standard [illegible] opportunity classes even if they stay one, two or three nights in a C 1 area, right?

[illegible] meaningful discussion of the impacts, both biophysical and social, upon the wilderness [illegible] wilderness users and wilderness values. Standards and indicators do not deal with impacts upon wilderness [illegible] Rather, they exclusively deal with whether outfitters are meeting the stock use, service days and camp [illegible] a remarkably favorable bias. The numbers on pages 2-18, 2-19 do not equal the totals noted. One of the [illegible] management is that larger groups, whether formally outfitted or not, create [illegible] setting. Some of these studies date back to the initial camping capacity work [illegible] (1990) "Hikers and Recreational Stock Users Predicting and Managing [illegible] in Three Wildernesses; Manning et al (1996), "Recreation Management in Natural Areas Problems and [illegible] and Trends," Cole (1990), "Campsite Conditions in the Bob Marshall Wilderness, Montana," and Cole and [illegible] "Threats to Wilderness Ecosystems: Impacts and Research Needs," all deal either directly or indirectly with [illegible] 27y 27z

[illegible] 4-15 has no merit unless it is compared to the existing utilized service days. As I've already noted, the [illegible] the wilderness and wilderness users will be affected by outfitting and guiding not how many service days [illegible] (4-15 - 4-20). 27aa

[illegible] this summer on extensive backpacks and have encountered some of the worst [illegible] stock use that I've ever seen, despite vigorous efforts, I'm sure, by wilderness rangers to [illegible] wilderness use ethics. I recognize the "official" outfitters will say it is the weekend horse user [illegible] I've talked with both groups). The point is impacts from large outfitted groups must [illegible] is a mockery.

[illegible] Lands Management

[illegible] and principles of wilderness management (DEIS 1-3 - 1-5) is that wilderness does not exist [illegible] is not to maintain a buffer zone on either side of the "wilderness line" that either automatically [illegible] just because a wilderness exists or that decreases the value of the wilderness because [illegible] lands or non-wilderness. But the policy and principle states clearly that activities outside [illegible] must be contemplated, considered and addressed in the wilderness management planning. 27bb

[illegible] principle and policy context. To suggest this DEIS on High Uintas Wilderness management [illegible] activities because it is outside of the purview of the proposed management actions clearly violates [illegible] management principles and policies and frames the proposed management improperly. 27cc

wilderness values and [illegible] more sound decisions concerning all existing use in the [illegible]

(27u)Part of the Forest Service mission is to provide [illegible] permitting of outfitter/guides is a service for those members of the [illegible] that require and/or wish to use outfitter/guides as a means to access the wilderness experiences, including hunting and fishing. Since the season for this type of use is only 3-4 months long, these types of businesses are not necessarily large. Direction in this document requires outfitters to [illegible] land managers in wilderness education efforts, trail work, etc. [illegible] (with outfitters and others) designed to meet these management [illegible] needed as Forest Service budgets decline.

Specifically, the stock use outfitters [illegible] managers in meeting wilderness objectives in several ways.

(27v)The [illegible] of social and resource conditions [illegible] suitable for [illegible] states that [illegible] 14/15 [illegible] the most meaningful and appropriate [illegible] economic statistics used on page 3-47 [illegible] from data provided by individual Outfitter [illegible] with or publications by [illegible]

(27w)The permitting of outfitter/guides is a service [illegible] public that require and/or wish to use outfitter/guides as a means [illegible] wilderness. As the human population around the High Uintas [illegible] increases, there will undoubtedly be an increase in both general [illegible] assisted public use of the wilderness. The increase in [illegible] to allow for this projected increase in assisted public use. [illegible] wilderness use figures are not available, however the [illegible] outfitter/guide (assisted public use) is estimated to be [illegible] of other public use in the wilderness.

(27x)At present between [illegible] and [illegible] of wilderness [illegible] sizes of 10 or less. And registration information suggests that [illegible] of the visitors to the HUW use stock and only [illegible] than 7 head of stock. In light of this information [illegible] change the group size standard of 14/15.

Travel through C[illegible] defined as Class II or III. A larger group that [illegible] system trail will be discouraged [illegible] into logistically smaller groups.

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[illegible] wilderness trailhead management, roadless wilderness (the proverbial small "w") management, and fisheries and wildlife management are crucially important in this context simply because wilderness is not a vacuum. It is profoundly [illegible] what goes on outside of the "wilderness line." Most wilderness trailheads are not immediately [illegible] the designated wilderness. Environmentalists, of course, fought as hard as possible to get Congress to bring the wilderness to the trailhead, even though this did happen in a few places, the Forest Service, disappointingly, did not push [illegible] and now suggests the wilderness management planning process must stay clear of these issues! In some [illegible] roadless area distance exists between the end of the road wilderness trailhead and the wilderness [illegible] that is not one iota different in content or character than the designated wilderness. By no means the only [illegible] example, but certainly the most recognized, is the Highline Trailhead--probably the heaviest used in the [illegible]

The [illegible] experience" starts at the trailhead. It is imperative the landscape from the trailhead to the wilderness be managed in a wilderness context. These issues must be dealt with in this wilderness management plan. Not doing so [illegible] of wilderness and the importance of wildness.

[illegible] with respect to wildlife/fisheries management. If non-native species are stocked or introduced [illegible] whether intentional or not (and it almost always is, isn't it?), they will migrate into the [illegible] the integrity of wilderness and the ability to "manage" for a pure wilderness environment. [illegible] 27dd

[illegible] Wilderness Ecosystems: Impacts and Research Needs," Ecological Applications [illegible] the U.S. Forest Service. [illegible] Wilderness Research Institute offer an excellent discussion on management [illegible]

[illegible]

[illegible] "sensitivity" within the wilderness [illegible] However, there is no discussion [illegible] 27ee
[illegible] it is a significant wilderness issue, or at least it was during the citizens task force and [illegible] High Uintas wilderness management efforts. There should be an analysis as to how these 27ee
[illegible] "compliance" with the wilderness context. While it is true that the Wilderness Act allows [illegible] 27ee
[illegible] these impoundments as permanent, the issues of maintenance [illegible]
[illegible] environmental impacts [illegible]
[illegible] the fact that on a number of occasions the Forest [illegible] access within the High Uintas Wilderness to access and maintain some of these [illegible] should plan for [illegible] to natural lake levels and provide interim direction as to how these [illegible] The DEIS should note which of these reservoirs are necessary for [illegible] 27ff
[illegible] were constructed.

[illegible]

[illegible] an issue within the scope of this document and can only be handled at the level of a forest plan [illegible] When I was a wilderness ranger in the Sawtooths, White Clouds and later the Uintas [illegible] sheep bands grazing, resting or bedded down [illegible] were huge issues [illegible] wilderness rangers! I have followed this issue on the Uintas since I was a [illegible] comments to both wilderness rangers and Forest Service offices.

[illegible] a significant issue outside of the immediate conflict with recreational use. The [illegible] sheep, in particular, as well as High Uinta carnivores such as cougar and [illegible] riparian areas and the broader issues of inherent biodiversity are [illegible] The Forest Service can't maintain what [illegible] integrity and [illegible] wilderness management in an ecosystem context while continuing to ignore [illegible]
[illegible] have been set in the Range and Health EIS and forest plans, the broader policy and [illegible] be dealt with in the High Uintas Wilderness Management plan. It is inconceivable to imagine [illegible] 27gg
[illegible] directly addressed.

[illegible] wilderness management issue. It is an issue found on allotments, on trails and on driveways, some of which are within [illegible] severe and acknowledged impacts (the East Fork driveway, of course). But, I recently had a [illegible] with you after your wilderness trip early in September wherein you conceded the sheep driveway was causing [illegible] within the wilderness and needed to be addressed. The Forest Service can't continue to ignore these [illegible] expect to be a professional land manager. Furthermore, while the DEIS notes a number of places have [illegible] overgrazing, it fails to deal with this issue. That can't be considered acceptable. Also, the DEIS fails 27hh
[illegible] condition of the rangeland resources described on p. 3-10 - 3-12. This is a must for obvious reasons.

[illegible] because grazing may continue in designated wilderness, subject to agency regulations under the Wilderness Act. 27ii

According to the literature (Cole, 1989), popular guide books (Davis and Veranth, 1993) and Leave No Trace publications (Harmon, 1974), [illegible] areas large groups can cause greater resource impacts. The Class I [illegible] condition description challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will [illegible] the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management [illegible] group size in Class I will be adopted.

Both stock and non-stock users who choose to travel in Class I [illegible] responsibility to travel lightly and in small groups.

(27y)Outfitters are held to the same resource standards as the [illegible] For example, when a standard for erosion is exceeded, management [illegible] designed to reverse that trend are implemented and applied [illegible]

(27z)Typos are corrected.

(27aa)The table on p. 4-15 lists service days by drainage [illegible] for use in comparing effects on individual outfitter/guide service [illegible] when different use limits and desired conditions designation [illegible] considered (issue 3). The complementary issue of how the wilderness [illegible] and other users are affected by outfitter/guide services is not specifically addressed because there is no sure way to identify effects [illegible] primarily to outfitter/guide service providers (which only account for less than 1% of total visitor days in the wilderness) since use by [illegible] public occurs simultaneously and concurrently to outfitter/guide use. However, several issues address the effects of cumulative human use effects [illegible] resources and other humans (e.g., issues 1, 2, 4, 5, 7, and 10).

(27bb)It is true that one important management principle for wilderness [illegible] consider contiguous lands. In the case of the High Uintas Wilderness, [illegible] the contiguous lands are of a roadless character and are very [illegible] wilderness. While these lands should be considered in managing [illegible] this effort is for the management of the wilderness itself, and no [illegible] made here to set desired future condition, standards, or [illegible] adjacent lands. We must be careful not to apply wilderness [illegible] outside wilderness and create, or create the appearance of, a [illegible] around the wilderness. Of critical importance is the [illegible] including trailheads, outside the wilderness that will provide [illegible] public visiting the HUW. In future decisions on trailhead [illegible] maintenance, the desired condition classes a trailhead accesses will [illegible] determine the development level of the facilities outside the wilderness.

(27cc)It is true that one important management principle for wilderness [illegible] consider contiguous lands. In the case of the High Uintas Wilderness, [illegible] the contiguous lands are of a roadless character and are very compatible with wilderness. While these lands should be considered in managing the wilderness, this effort is for the management of the wilderness itself, and no attempt [illegible]

[illegible] its ramifications as an issue of great biological/social concern. The hubris the Forest Service shows on this and many of the other issues raised here must be as disconcerting to you as a forest supervisor with a phenomenal responsibility toward a public resource as it is to many of us. It is imperative you move forward on these issues. 27ii

Fisheries/Wildlife

"Non-native or alien species pose a significant threat to wilderness and other protected lands by their direct and indirect impacts to native species, and by their effects on broader scales ecological patterns and processes." (Cole and Landres [illegible])

[illegible] this issue consistently, as you, your staff, predecessors and colleagues know, for almost two decades now. The above noted Forest Service researchers state it as plainly as can be stated. It is the precise reason why "non-native wildlife and fisheries" represent one of the critical and undeniable High Uintas Wilderness issues. This is not a matter of deferring to state wildlife managers to determine what is "native" and what isn't, or deferring to a traditional state wildlife management [illegible]. Allowing that argument to stand for the moment, even though it is a very weak and tenuous argument, does not change the context of non-native species introduction as a meaningful and complex issue part and parcel of the very core of [illegible] management plan. NEPA requires, for example, the analysis of all pertinent issues that affect the quality of the [illegible] public lands. The ownership (or transfer of ownership, as the Forest Service has done) of the issue is [illegible] it's an issue.

[illegible] issue because it has been raised by almost all of your publics. It is an issue because it has been raised in a [illegible] setting by the state wildlife management agency. It is an issue because it deals directly with the habitat [illegible] on the High Uintas Wilderness. It is an issue because it brings into stark contrast the intent of wilderness [illegible] and philosophy. It is an issue because it poses a threat to wilderness integrity, as noted by Cole and Landres [illegible] wrong for the Forest Service to consider it in any other manner.

[illegible] there are numerous studies which document the impacts of non-native fisheries upon wilderness aquatic [illegible]. Considerable research has been initiated in the last decade with respect to this issue and it is one of the most [illegible] issues on the Uintas. Non-native fish stocking programs directly affect the aquatic habitats of the High Uintas [illegible]. They directly affect the terrestrial habitats by concentrating extensive use around the more popular stocked [illegible] this can be denied. A history of Forest Service wilderness managers' observations and research dating back [illegible] carrying capacity work done by Stankey has looked indirectly at Uintas fishery issues. 27jj

[illegible] papers were presented at the Western Division of the American Fisheries Society meeting (Jan. 1996) focusing [illegible] this very issue and the impacts of stocked, recreation-based, non-native fisheries upon naturally fishless, high elevation [illegible] wilderness (both capital W and small w) settings.

[illegible] by Utah State University College of Natural Resource researchers (a four chapter report submitted to the Intermountain Research Station and presented to the above noted AFS meeting) further document the impacts of non-native [illegible] upon the native fisheries. The research clearly notes, also, that native fisheries are likely to be most [illegible] settings (see Chapter III of the report, The Influence of Habitat Fragmentation on Population [illegible] River Cutthroat Trout in [illegible] Uinta Mountain Streams).

[illegible] The actual and potential impacts upon habitat, aquatic and terrestrial, the impacts upon the wilderness [illegible] context and upon wilderness values/philosophy are obvious and real. The U.S. Forest Service can't squeeze [illegible] issues. They must be directly acknowledged and addressed/analyzed. Interestingly the DEIS notes UDWR's [illegible] stocking program focuses on an "optimum fishing experience" which is, of course, in direct conflict with the intent [illegible] ecosystem management and the very guidelines and polices which guide your management of wilderness [illegible] 27kk

[illegible] focused on the fisheries issues and the resultant impacts upon native aquatic resources, the same holds true for [illegible] of the non-native mountain goat. It is just plain wrong for the Forest Service to accept a standard that the [illegible] of mountain goats, which are clearly not indigenous to the Uintas or Utah, is a state wildlife issue and thus out of [illegible] habitat managing U.S. Forest Service. This issue is one of habitat. And in this instance, the habitat and [illegible]. The ecological integrity of the High Uintas is being subdued. The integrity of the Forest Service is suspect. [illegible] of mountain goats, a state issue, is one thing. Transplanting goats which will likely have significant impacts upon the [illegible] ecosystems of the High Uintas Wilderness is not a hunting issue. It is plainly, clearly and simply an issue of habitat and [illegible] integrity. 27ll

[illegible] to be addressed and analyzed. Another 15 goats were just recently placed adjacent to the High Uintas [illegible] view" of the wilderness, in fact. The mountain goats will move there, of course. That was intended. The [illegible] Service allowed this to happen again indicates it is the desired future condition preferred by the Forest [illegible]

[illegible] goats already exist—what additional damage can be done?—begs the question. Look at Olympic [illegible] Park. The more the Forest Service turns its head, the greater the potential damage that can be done. And it will be [illegible]. Not much of an indication of leadership and stewardship.

made here to set desired future condition, standards, or indicators for adjacent lands. We must be careful not to apply wilderness standards to [illegible] outside wilderness and create, or create the appearance of, a buffer [illegible] around the wilderness. Of critical importance is the road and trail network including trailheads, outside the wilderness that will provide access for the public visiting the HUW. In future decisions on trailhead improvements and maintenance, the desired condition classes a trailhead accesses will [illegible] determine the development level of the facilities outside the wilderness.

(27dd)This is true, but the Forest Service many times [illegible] where a release is made.

(27ee)The irrigation reservoirs in the wilderness that were [illegible] time the Utah Wilderness Act was passed are legal and can be [illegible] established purpose as long as the need exists. The [illegible] maintenance, using motorized or mechanical means [illegible] analysis that these are the minimum tools needed to do the work. The [illegible] Service retains the decision authority on when and under what [illegible] motorized or mechanical tools may be used.

The Uinta Basin Replacement Project (UBRP) portion of the [illegible] Completion Act has, as part of its mandate, to stabilize reservoirs [illegible] wilderness if facilities are built which will allow transfer of water storage rights. The Draft Environmental Impact Statements for the Uintah and [illegible] units of the UBRP project propose the construction of reservoirs which [illegible] allow the transfer of storage rights, and propose the stabilization of [illegible] special use reservoirs in Yellowstone, Swift Creek, and Uinta C[illegible]

These reservoirs will be stabilized at a level that more [illegible] preconstruction conditions, and allow natural streamflow [illegible] to occur. The reservoirs must be stabilized at a level that [illegible] requires no maintenance or inspection, and requires no permit. The [illegible] level of the lake that will meet these conditions will vary [illegible] lakes may be slightly larger or smaller that the original [illegible] on what must be done at each site to meet the no hazard criteria.

(27ff)The irrigation reservoirs in the wilderness that were [illegible] time the Utah Wilderness Act was passed are legal, and can be used [illegible] established purpose as long as the need exists.

(27gg)As explained in the document, permitted grazing is beyond the scope of this document. However, the HUW DEIS does provide programmatic direction for management of the High Uintas Wilderness. Desired conditions include plant communities that are affected by natural processes, and maintain their natural appearance with viable populations of indigenous High Uinta plants [illegible]. These desired conditions are intended to apply to management of all resource uses.

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[illegible] and MOU should be completed and outlined in the DEIS as it is part and parcel of the planning [illegible] 27mm

[illegible] Forests are willing to allow non-native ("weedy") fisheries and terrestrial species to be [illegible] High Uintas Wilderness in contradiction to intent, policy and common sense. I think you [illegible] I look forward to hearing it, particularly since the DEIS notes the desired condition is [illegible] processes and the forces of natural selection determine the diversity of wildlife and fish habitat [illegible] are limited to indigenous species..." The words and deed don't match. Also, don't forget that [illegible] wilderness users at two of the heaviest trailheads planned to fish! 27nn

Recreation User Groups

[illegible] confused about the three identified wilderness user type groups. Where did that [illegible] have you relied upon to categorize High Uintas Wilderness users in these three groups? [illegible] or even valid. It is so broad that it is unfair and probably meaningless. You are not [illegible] group type and no group type can adequately capture the intent or value of wilderness [illegible] between any categorization depending upon a number of factors: time length, intent, [illegible] What is the purpose of this discussion and how has it contributed to your selection of an alternative [illegible] user trend or characteristic studies. (See, for example, "Human Values and Codes of [illegible] Eagle Cap Wilderness Visitors and Their Attitudes," Natural Areas Journal V. 16(2) 1996; [illegible] Wilderness Visitors and Visits: Boundary Waters Canoe Area, Shining Rock and Desolation Wildernesses," [illegible] October 1995; "Human Experience of Wildlands A Review of Needs and Policy," Western Wildlands Fall [illegible]; [illegible] Characteristics: Ending Some Misconceptions," Western Wildlands, Fall 1988.) 27oo

[illegible] one user group might prefer more opportunity class II or III than class I, for example [illegible] What is your documentation? The purpose is not to provide a second choice for each [illegible] alternative notes) or to maximize for one group its suspected best opportunity class. The [illegible] has forgotten its purpose, is to preserve the wilderness resource and experience while always [illegible] wilderness context. If you manage for lower opportunity classes and user groups who care less [illegible] wilderness experience, you have made a severe and singular error in wilderness management. The [illegible] some users are offended by the presence of Forest Service wilderness rangers is absurd. Many users are [illegible] wilderness rangers are not always treading (extensive horse use and large base camps) as lightly as the [illegible] 27pp

Fire

[illegible] Management Plan should, of course, harbor the guidelines and structure of a wilderness fire [illegible] oversight and must be rectified if the intent is to allow natural processes to guide the [illegible] 27qq

[illegible]

[illegible] Ranger District's fire closure. Having spent time in Four Lakes Basin this summer [illegible] on the Henrys and Smiths Fork, I noted little or no quantitative difference in the [illegible] these areas as compared to Naturalist Basin. Clearly such a policy direction ought to be [illegible] provide a clear indicator and standard for all of the wilderness [illegible] More and more hikers and horse users are [illegible] Impact Recreational Practices for Wilderness and Backcountry," [illegible] 27ss

[illegible] directive that prohibits any more trail construction. The wilderness is now [illegible] standard ought to be initiated which would inventory unnecessary trails and [illegible] 27tt

Horse Use

[illegible] horses extensively in wilderness settings. Uintas horse users seem to be an uneducated lot with respect to [illegible] camping techniques. If they can't get it right, the standards and indicators in this DEIS must be utilized by the Forest [illegible] horse use. Let us hope horse users in the Uintas will figure it out sooner than later! 27uu

[illegible] these comments will be utilized and not simply dismissed with a quick "thank you for your concerns." Bert and Bernie [illegible] please contact me. Thanks.

[signature]

(27hh)Ecological condition of rangeland resources for the HUW are addressed in Allotment Management NEPA documents and the Wasatch Cache Rangeland [illegible] EIS.

(27ii)We agree that grazing can and does create conditions not consistent with a concept of ubiquitous, pure natural conditions. However, specific soil, plant, water, and other resource values related to livestock grazing have and will be addressed in the NEPA process for specific allotments. This programmatic document is not an appropriate place to address site specific conditions.

(27jj & kk)Human induced degradation around lakes can be addressed [illegible] changing stocking locations or by regulating visitor traffic and use patterns. Standards defined in this decision, mark when conditions require management actions to stop degradation of soils and vegetation around lakes.

Comments from the public and discussions at ID team meetings [illegible] stocking to be added as Issue 12. The effects of fish stocking [illegible] in Chapter 4.

The Wilderness Act of 1964, in Section 4 (d) (8), states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests." It is recognized that fish stocking invites excessive human use in some areas and that stocking can interfere with natural lake ecology. (Holden, et al. [illegible]) For currently stocked lakes, these impacts to historic aquatic natural systems have already occurred.

The State of Utah affirms that "we will be developing a memorandum of understanding (MOU) with the Forest Service describing [illegible] and habitat management for the HUW." (HUW DEIS letter [illegible]) Forest Service will continue pursuing common ground in an MOU [illegible] deal with the fish stocking issue.

(27ll)There is no evidence that goats will have significant impacts [illegible] ecosystems.

(27mm)The State of Utah (letter #40) has agreed to work with the Forest Service on an MOU. Progress is outlined in the Record of Decision.

(27nn)It is true that we wish to allow natural processes and the forces of natural selection determine the diversity of wildlife and fish habitat and species. However, if an indigenous species was extripated by human activities and it is determined by the Forest Service and Utah Division of Wildlife Resources that the species could be successfully reintroduced, we would [illegible] that action.

(27oo & pp)Our social scientist used known user patterns to develop the three groups. We do not have data at this point to support this model. The model is intuitive and will be modified to improve its validity. It was approved by the ID team and helps managers make some basic assumptions. There is no risk in using the model.

(27qq)Your statements are correct. There are additional requirements that must be included in the EIS that will more completely address fire management and the guidelines and structure of a wilderness fire management plan.

The Forest Service Manual lists 10 areas that must be included in a Forest Plan, or amendments to a Forest Plan, that address the Prescribed Natural Fire (PNF) Program requirements. At the present time, these requirements are not fully addressed in the Draft EIS. The first two, general description of the area, and the fire history of the area, including the role of natural fire, are both covered in the DEIS. The following additional topics will also be addressed in the Final EIS.

1. General objectives to be achieved by PNF and identification of acceptable outcomes.
2. General discussion of the required skills, qualifications and organization necessary to implement and manage the PNF program.
3. General funding requirements.
4. Interagency and intra-agency coordination.
5. General discussion of "inform and involve actions to include both internal and external audiences.
6. Risk involved and potential impacts of plan implementation, including the trade off between smoke emissions from prescribed natural fire and the ecological need to burn.
7. Identification of fuel treatment measures needed to reduce hazard fuels in support of the PNF program, including identification of [illegible] developments that need protection from fire.
8. Identification of the appropriate level of monitoring and evaluation needed for the PNF program.

(27rr) numbering mistake, no comment identified

(27ss)The EIS proposes a firewood standard (pg 2-[illegible]) which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience. Utilizing a quantifiable method, campfires would be restricted and only stoves allowed when monitoring indicated an unacceptable adverse effect on visual tree resources.

(27tt)Evaluating trails is an on going process. In the past few years we have identified trails to leave off maps submitted for reissuance of maps, this process occurs every seven to ten years. Construction of new trails is weighed heavily against the need for the trail due to construction expenses. Construction of trails is usually directed at relocating poorly designed trails to avoid sensitive areas.

(27uu)Monitoring, using indicators and standards will highlight problem areas for management attention. Horse use has been a problem of education and lack of enforcement. Budget restraints have prevented the presence of on the ground rangers in the drainages that horse users frequent. Back Country Horsemen of Utah is a group we are working with to expand leave no trace horse camping sensibilities.

if the Ashley and W-C NFs are willing to allow non native species to be indiscriminately introduced into the HUW, I think you owe us all a clear explanation, since the DEIS notes the desired condition is supposed to call for "Natural processes and the forces of natural selection determine the [illegible] of wildlife and fish habitat and species." [illegible] indigenous species.

(27vv)It is the State's responsibility to determine if a species is [illegible] or not. The only species which are being put in the wilderness which are [illegible] indigenous are fish species which the State has historically stocked. The fish stocking issue will be addressed by the State and the Forest Service in a memorandum of understanding they will develop on the fish stocking issue.

SEP 11

Sept. 6, 1996
Eden, UT

Bert Kulesa
Forest Supervisor
Ashley NF
Vernal, UT

Dear Bert

Please excuse the form of this response to the High Uintas Wilderness Plan DEIS. This is in haste.

I had a chance to read the DEIS while on a horse pack trip in the High Uintas Wilderness (Rock Creek drainage) a couple weeks ago. My comments are brief and to the point.

I understand the challenge you face in managing this great wilderness and keeping it clean and natural. Education of the using public along with minimal "law enforcement", patroling trail maintenance, etc. are key needs.

Regarding the plan itself, Bert I think you folks are way off

28a

(28a)Many options exist amongst the variety of management actions available. Actions need to be evaluated relative to other options for their ranking by the "minimum tool" concept, their cost, and the ability to be successfully implemented. The "minimum tool" concept implies that the minimum tool or management action chosen is appropriate and is only what is needed to protect the wilderness resource. Management actions run along a continuum from the benign, i.e., a sign, to law enforcement actions. This allows managers to use the "minimum tool concept" in choosing a course of action to address any issue. Enforcement through education is the preferred approach by the Forest Service. The EIS is not the proper vehicle for developing individual management actions. Management actions have to be decided on a case by case basis. Each drainage has has management concerns that need to be addressed individually. Some flexibility in choosing management actions need to be available to the wilderness managers.

Lase! In my opinion, based on a few years of experience in this area, there should not be any categories of Wilderness — it is all Wilderness and should be managed uniformly. It is not consistant with the Wilderness Act or long standing policy to call some areas more Wilderness than others (in effect that's what the plan says). At the risk of sounding like an old moss back, please list me among those who prefer the alternative that favors the existing plan.

Good luck in completing this project and in your tenure as Forest Supervisor of the Ashley.

Best personal regards,

Glenn Tilton

28b

28c

(28b)We feel the desired conditions statements and standards described on pages 2-2 through 2-27 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

The use of desired condition classes is applied to this plan as a means to allocate resources by acknowledging diversity in use patterns and user behavior. Establishing varying classes in the wilderness, allows management to use specific strategies for specific sections of the wilderness. The kind and intensity of management can be varied based on the desired condition sought. Without using classes to allocate management resources and efforts, there is an inherent danger that the entire wilderness may degenerate to some minimum standard due to an unfocused management approach. Definitely, the classes provides managers with a tool to enhance the protection of wilderness.

(28c) Your support for Alternative 5 (no action) is noted.

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal, UT 84078

Mr. Kulesza:

[illegible] concerns with the "Draft Environmental Impact Statement for Management of the High Uintas Wilderness." These concerns involve assumptions made, alternatives proposed, and lack of consideration of [illegible] issues.

The assumption that grazing interests, horse users, outfitters and guides, and hunters are [illegible] and traditional is unfounded. These are [illegible] interests that led to the designation of the High Uintas Wilderness, and though they use the wilderness, they are not the traditional supporters [illegible]. In fact, their uses are not wild. [illegible] local. I've known sheepmen [illegible] the Wasatch Front, but graze their [illegible] High Uintas Wilderness, horsemen from the Wasatch Front who yearly ride to Granddaddy Basin, [illegible] from the Wasatch Front who [illegible]. Outfitters and guides may be local, but their customers are not. To consider [illegible] users as local, a designation which in today's [illegible] language gives them more power, is wrong. To consider people who want to preserve the wild [illegible] is equally wrong. [This arbitrary, 29a

(29a) Models are appropriate for use in analysis and an EIS is an analysis tool. Our social scientist used known user patterns to develop the three groups. We do not have data at this point to support this model. The model is intuitive and will be modified to improve its validity. It was approved by the ID team and helps managers make some basic assumptions. There is [illegible] using the model.

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[illegible] of users is not appropriate in an EIS. The impacts to the wilderness are the same whether the grazer, hiker, horseman, fisherman, or hunter is from Lonetree, Evanston, Vernal, Salt Lake, or New York. 29a

[illegible] alternative proposes more than [illegible]% of the area as Class I. To propose that [illegible] the nation's 17th largest wilderness less than [illegible] acres should managed for the least [illegible] impact is short-sighted. 29b Once these lands [illegible] they cannot become truly wild again. [illegible] alternatives should be offered or more alternatives [illegible] consider 40% or more of the area be managed as Class I. 29c Within Class I areas, watersheds should be managed for indigenous aquatic species. 29d Continuing to plant non-indigenous species will continue to degrade the natural system. Lakes that had no fish prior to planting should not be planted, and all aquatic fauna must be considered in analyzing the effects of fish planting.

Areas designated as Class III should be minimized, and should be limited to day use areas within a few miles of Highway 50. 29e The ecosystem [illegible] will benefit from keeping most of the High Uintas [illegible].

The draft EIS does not include analysis of the grazing allotments including impact to indigenous plants and animals, and impact to water quality and fisheries. 29f The draft EIS does not include analysis of the management of contigent lands and how activities on contiguous land will affect the High Uintas Wilderness. 29g

(29b)We feel the preferred alternative (incorporating the desired conditions descriptions and standards described on pages 2-2 through 2-17) meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(29c)NEPA regulations require the Forest Service to analyze an array of reasonable alternatives. Alternative 3 does consider 40% as Class I. An alternative that mapped more than 40% Class I, was considered but excluded from further analysis because it did not meet the sideboards of Class I being outside existing livestock allotments.

(29d)This is the desire of the Forest Service and will be dealt with in the memorandum of understanding on fish stocking that will be drawn up between the Forest Service and the State.

(29e)We feel the desired conditions statements and standards described on pages 2-2 through 2-27 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(29f)The physical presence of livestock in wilderness is clearly within the Wilderness Act. The removal of livestock from wilderness based on [illegible] designation is contrary to Congressional grazing guidelines. Specific soil, plant, water, and other resource values related to livestock grazing have and will be addressed in the NEPA process for specific allotments. Such site specific issues are more appropriately addressed at that level than in this programmatic DEIS. This more site specific approach is also indicated in the Congressional Grazing Guidelines.

(29g)It is true that one important management principle for wilderness is to consider contiguous lands. In the case of the High Uintas Wilderness, much of the contiguous lands are of a roadless character and are very compatible with wilderness. While these lands should be considered in managing the wilderness, this effort is for the management of the wilderness itself, and no attempt is made here to set desired future condition, standards, or indicators for adjacent lands. We must be careful not to apply wilderness standards to areas outside wilderness and create, or create the appearance of, a buffer zone around the wilderness. Of critical importance is the road and trail network, including trailheads, outside the wilderness that will provide access for the public visiting the HUW. In future decisions on trailhead improvements and maintenance, the desired condition classes a trailhead accesses will help determine the development level of the facilities outside the wilderness.

Again, some of the effects to consider are water quality soil, wildlife habitat, especially pine marten and goshawk habitat.

This draft EIS does not include analysis of [non-native fisheries,] including the effect on introduced species to the natural food chain, and the effects of the concentrated use around the stocked lakes. 29h

I thank you for reading this letter, and urge you to improve the EIS to keep the High Uintas wild.

Sincerely,
Lynette Brooks

Lynette Brooks
10875 So. Bowden St
Sandy, UT 84070

(29h)Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4.

Salt Lake City, UT
Sept. 14, 1996

[illegible] Kulesza, Forest Supervisor
[illegible] National Forest
355 N. Vernal Ave.
Vernal, UT 84078

Dear Mr. Kulesza:

I am writing to comment on the Draft EIS for the High Uintas Wilderness. As a member (during the first year) of the [illegible] AC Committee, I have participated in and subsequently observed, the evolution of this [illegible] over the past four years. I write with [illegible] straightforward comments:

(1) [Designated wilderness should be managed as wilderness.] Where its condition is not consistent with what can be honestly called wilderness, management needs to put in motion a direction that will lead to wilderness conditions. 30a

(2) [The alternative submitted by the Utah Wilderness Association is the only one that approaches the standard that a High Uintas wilderness should be treated as wilderness.] I [illegible] that alternative for [illegible] management. 30b

(3) [[illegible] areas should be managed for indigenous species. Stocking exotic species should be disallowed.] 30c

(30a)The established standards, along with the desired future condition statements will allow us to monitor appropriate indicators to insure that the designated lands will be managed as wilderness according to the act. The desired future condition statements for all opportunity classes are written to be in compliance with the principles and definition of wilderness. We realize that not everyone will agree that the condition class definitions, particularly for class III, meet wilderness criteria.

(30b)All the classes described in this document meet the intent of the Wilderness Act of 1964.

(30c)The Forest Service supports discontinuing fish stocking in Class I. This will be dealt with in the memorandum of understanding on fish stocking that will be drawn up between the Forest Service and the State. Stocking of exotic species will not be allowed.

Thank you for the opportunity to
[illegible]

Sincerely,
Connie Bullis

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal, Utah 84078

September 11, 1996

Dear Mr. Kulesza

I am happy to provide comments on the High Uintas Wilderness Management Plan. Please include them in the official record of public comment and decision.

As one who has visited and loved the Uintas for over twenty years, I care deeply about their management. What I see "on the ground" does not match the definition of wild nature that should be the standard for an American wilderness of this quality and size. The Uintas have deteriorated in wildness due to years of failure to implement some rather basic tenets of management.

I have served in the Forest Service as a wilderness ranger. I packed horses and mules as a seasonal wilderness ranger on the Sawtooth Wilderness in Idaho, working in wilderness, seeing how users treat the land, attempting to educate them in their visit to the wilderness and learning how much wilderness and wild places mean to visitors hungering for places wild and natural. I have hiked extensively in the Uintas for twenty years, studying the drainages and forests [illegible] wilderness in my personal campaign with the Utah Wilderness Association (of which I am a co-founder) to secure wilderness protection for the Uintas. I am saddened to realize that protection of an area is just the beginning; the real work obviously comes afterward. I wish this were not the case. The Uintas have much to be repaired.

Why has the Forest Service not recommended a meaningful plan for the improvement of this magnificent range? 31a
This plan is a poor effort. It does not address contiguous lands and their uses, an issue which bears heavily on the health of lands within the management scheme of the wilderness itself. It assumes outfitting will continue to increase yet does nothing to assess its impact. Why does the plan not protect the land, just the assumed users and their history of abuse? Why are firepits still allowed? This must be corrected by both forest supervisors NOW.

According to your terminology, I am a member of Group Two (is there really a need for such labeling in a document of this order?). I do not live on the edge of the Uintas but I strongly support its status and its protection for the sake of the wild systems of life it encompasses. It is my belief that **implementing Class I for the majority** 31b
of the range matches the intent of the area's designation and I strongly support Alternative 3. *Little human influence should be evident (multiple fire pits or concentrations of human feces near traditional campsites far too close to lakes is but one example, heavy horse use is but an outgrowth of what the agency has allowed to occur and subsequently damage fragile meadows, girdle trees in large camps, and trample vegetation along fragile riparian zones.)

*Outstanding opportunities for solitude and primitive recreation are key words in the Wilderness Act and 31c
should be innate conditions in the High Uintas. They must be dominate management principals. To allow otherwise does not distinguish wilderness from any other lands under your management. I cannot imagine further allowances for the outfitting guide businesses you are currently permitting. Scout groups violate group size, or are permitted at already incredibly large numbers traveling or regrouping together. Horses beat down a trail, carry in too much gear and too many people and I speak from a lifetime of horse use. I know personally what damage one let alone 2 dozen horses can do to trees, meadows and trails in any weather condition.

Margaret Pettis 190 S. 100 W., Hyrum, Utah 84319
(801) 245-6747

(31a)In the case of the High Uintas Wilderness, much of the contiguous lands are of a roadless character and are very compatible with wilderness. While these lands should be considered in managing the wilderness, this effort is for the management of the wilderness itself, and no attempt is made here to set desired future condition, standards, or indicators for adjacent lands. We must be careful not to apply wilderness standards to areas outside wilderness and create, or create the appearance of, a buffer zone around the wilderness. Of critical importance is the road and trail network, including trailheads, outside the wilderness that will provide access for the public visiting the HUW. In future decisions on trailhead improvements and maintenance, the desired condition classes a trailhead accesses will help determine the development level of the facilities outside the wilderness.

Use by the outfitted public is monitored at the same time and using the same indicators and standards (pg 2-9 through 2-17) as for the non outfitted public. In addition outfitters must meet the needs criteria defined on pg 2-2 in order to increase their service day allotments over their present use.

We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

According to Cole (1989), concentrating use by using existing firerings in well impacted areas deters proliferation of campsites and increases of campfire impacts at each site. In places with well impacted campsites (concentrated use areas in Class II and III), build fires in existing firerings or on fire scars (Cole, 1989).

(31b)Preference for Alternative 3 noted.

(31c)We feel the desired conditions statements and standards described on pages 2-2 through 2 17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(31a) Desired conditions described in the document determine appropriate [illegible] uses (as determined in the 1964 and 1984 Wilderness Acts) in order to maintain and support natural processes, natural appearance, and natural ecological role of fire.

(31c)The EIS proposes a firewood standard (pg 2-16) which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience. Utilizing a quantifiable method, campfires would be restricted and only [illegible] monitoring indicated a unacceptable adverse effect on visual [illegible]

As managers, the Forest Service is committed to providing [illegible] the wilderness resource as well as providing opportunities for recreation. Wood collection will be managed and/or restricted to protect natural [illegible]

Ecological processes should dominate not the ORV damage such as that found along the lower reaches of the W Fork Blacks Fork or heavy campsite damage in lake basins or large horse groups traveling up and down drainages Campfires should not be allowed in high use areas 31d 31e

Stocking of lakes with nonnative fish should be ended fish for what is there naturally If the fish do not occur the lake cannot be fished Simple Do not create an artificial resource that only concentrates use and damages the environment used by so many whose sights are only on what they can pull out of the water There is much work needed to reestablish native fisheries cutthroat trout, not perpetuate the rainbow put and take fisheries of the Utah high country It has 1 watersheds, in particular, should be maintained as native aquatic fisheries As a member of the Utah Wilderness Association I supported and still recommend adoption of our Yellowstone River Colorado Cutthroat Trout Refugia 31f 31g 31g

No fat renew livestock grazing allotments in areas where wildlife could have a much easier time of surviving without competing with domestic grass shearing ewes When I learned years ago that the count of a man's herd did not include the lambs, I was appalled The number of animals in the Uintas is therefore much higher than expressed in any report Hoof wear along the trail and meadows, feces and dust, and the removal of vegetation to the point of denuding entire slopes and meadows is something the agencies could justifiably solve But for some reason the politics of pleasing a "cowboy caucus" or rancher-led legislature which puts pressure on congressmen to affect federal budgeting has the agency in a grip of fear Including domestic grazing as status quo while doing nothing to improve the survival of bighorn sheep and our wild Uintas predators is ludicrous 31h

I have hiked countless drainages and side drainages forested slopes, meadows, stream courses and talusy country in the Uintas In my opinion I feel I should include everywhere the sheep don't graze the magnificent country [illegible] Trail Lakes and Naturalist Basin, the Amethyst country at the top of Stillwater, Squaw and Yatt Basins, the reaches of the Uinta and Yellowstone Rivers, as "all that country we have tried for years to protect on Beaver Creek and Burnt Fork Surely managing the land you were assigned to administer as wilderness is not that difficult Simply **DO WHAT IS RIGHT FOR THE LAND** 31i

After two decades of hiking this range I cannot sit by and watch the largest Forest Service wilderness in Utah erode in a quagmire of politics and laissez faire management It is not too late to rescue the Uintas And I sincerely trust this is not a futile effort in public involvement I expect to see my and others' comments asking for strong protection of this range included in a real plan for the WILDERNESS MANAGEMENT of the Uintas

Thank you for including my comments in any future discussions about the Uintas

Sincerely

Margaret Lotus

We are collecting data to support this standard Campfire wood collection and campfires are more appropriately managed by a quantifiable standard which addresses effects on the resource rather than managing by a blanket prohibition of campfires in areas where the resource can accommodate campfire wood collection

(31f)Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12 The effects of fish stocking are discussed in Chapter 4

The Wilderness Act of 1964, Section 4(d)(6) states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish on the national forests." The Forest Service will be working with the State to develop a memorandum of understanding concerning fish stocking in the wilderness The State is looking at more indigenous fisheries where feasible

(31g)The Forest Service supports discontinuing fish stocking in Class I This will be dealt with in the memorandum of understanding on fish stocking that will be drawn up between the Forest Service and the State The issue of the refugia will not be dealt with in this document since it would be a cooperative responsibility with the State and agreements would be needed to outline roles and responsibilities for implementation and enforcement

(31h)Given the mandates in the Wilderness Act that grazing shall continue this comment is outside the scope of this programmatic document This interpretation of this comment is indicated by direction in Congressional grazing guidelines that there shall be no curtailments of grazing in wilderness areas simply because an area is or has been designated as wilderness nor should wilderness designations be used as an excuse by administrators to slowly "phase out" grazing Management for wildlife species that might be sensitive to presence of livestock is compounded by language in the Wilderness Act and Congressional Grazing Guidelines This is beyond the scope of this EIS

(31i)Some areas not grazed and not in Class I do not have Class I values for reasons other than grazing Some of these areas are intended for management other than Class I to prevent higher use levels in areas designated as Class I and II

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

(32a)Comment noted

(32b)Preference for Alternative 1 noted

Ref: 8EPR-EP

Mr. Burt Kulawik
Forest Supervisor
Ashley National Forest
355 N. Vernal Ave.
Vernal, UT 84078

Re: Draft Environmental Impact
Statement for Management of the
High Uintas Wilderness

Dear Mr. Kulawik:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the subject project. We offer the following comments for your consideration.

We commend the Ashley and Wasatch-Cache National Forests for their mutual concerns of the condition and use of the High Uintas Wilderness and the need to amend current direction in the existing Forest Plans. The EPA agrees that evaluating existing monitoring results and the application of the Limits of Acceptable Change (LAC) planning process will aid the Forests in defining those desired conditions to be maintained or restored in the area. 32a

The EPA believes that selection and implementation of Alternative 1, the Forests preferred alternative, as the proposed action meets the stated purpose and need. 32b

Based on the procedures the EPA uses to evaluate the environmental impacts of the proposed action and alternatives and the adequacy of information provided, the EPA Region VIII rates the Draft EIS as category LO (Lack of Objections). A summary of the EPA's rating definitions is attached for reference.

The EPA appreciates the opportunity to review and comment on the DEAFF EIS. If you have any questions, please contact Mike Barrow of my staff at (303) 312-6563.

Sincerely,

Carol E. Campbell

Carol E. Campbell, Director
Ecosystems Protection Program

cc: Elliott Laws, OFA EPA HQ

SUMMARY OF RATING DEFINITIONS
AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this process may be appropriate for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate
EPA believes the draft EIS adequately sets forth the environmental impact of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the N. E.P.A. and/or Section 309 review, and that should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this process should be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.

Figure 4-1

Brent Hansen
P O Box 263
Vernal Utah 84078

September 13, 1996

[illegible] Kulesza Forest Supervisor
Ashley National Forest
[illegible] N. Vernal Ave.
Vernal Utah 84078

Re: High Uintas Wilderness Management Plan
Draft EIS

Dear Mr Kulesza

Of the alternatives that were studied, [I 33a support alternative 3. Wilderness preservation should be the primary goal] otherwise what is the purpose of calling the area wilderness if it is not managed to keep it as natural as possible.

Grazing could not be banned if that was one of the promises made when wilderness designation was allowed, but I believe the promise was that grazing would be phased out. Grazing definitely should not be expanded into areas that were not actively grazed at time of wilderness designation. [When grazing conflicts with native 33b species like elk, deer, etc then the native species must be given priority.]

(33a)Preference for Alternative 3 noted

(33b)Desired condition given in the EIS included values associated with native species. However, regardless of priority based on wilderness values, the Wilderness Act states grazing of livestock shall continue in wilderness. Congressional grazing guidelines support the interpretation of the act that livestock grazing shall continue. It is not the purpose of the EIS to challenge this mandate and direction. Specific wildlife, soil, plant, water, and other resource values related to livestock grazing have and will be addressed in the NEPA process for specific allotments.

When over grazing occurs then proper land management requires that the number of animals should be restricted and the time period reduced so that the land can recover. Humans should be managed on wilderness the same way. Some lakes may need to be closed to camping for one year (or perhaps to groups above a certain size).

In summary, wilderness should be managed to protect the land. Livestock and humans should be restricted as necessary to protect the resource. Restrictions need to be reasonable - people should be permitted to visit and enjoy all areas they can be accessed without damaging the resources. And, non-native species should not be brought in to disrupt the native eco-systems.

Sincerely,

Brent Hansen

Brent Hansen

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(330)This is a major intent of planning and management of the High Uintas Wilderness. The Shale Creek area of the Duchesne River Drainage offers a view of conditions where livestock have never been permitted and where human use has been very low. The Shale Creek Research Natural Area (RNA) in the Uinta Drainage offers a view of conditions where few if any livestock have grazed and where human use has been very low. General comparison of vegetation and soil in these areas with other areas in the Wilderness shows very little obvious difference in plant composition, abundance, or vigor. This comparison indicates resources can be protected with some use. Maintaining or achieving desired conditions as listed in the DEIS will provide protection for resources.

Non-native fish should not be stocked in wilderness lakes. The stocking of fish is acceptable but only of native species. 33c

[Big horn sheep should be re-introduced. 33d

But, rocky mountain goats should not be introduced unless it can be shown that they were native at one time.] Introduced species almost always create problems for the native species and such problems should be avoided [illegible] since the effects are rarely [illegible] to creating the problem.

[Campfires should be regulated.] People should use camp stoves or fire pans to cook on. Horse campers can bring in a firepan if they need a campfire for entertainment. Backpackers can camp in Class III areas if they want a fire. 33e

[Campfires should not be permitted in Class I or Class II areas without a firepan.] A problem with campfires in popular areas is the potential lack of wood to burn. This causes destruction of live vegetation which further destroys the wilderness area. 33e

(33c) Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4.

The Wilderness Act of 1964, Section 4 (d) (8), states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several State with respect to wildlife and fish in the national forests." The Forest Service will be working with the State to develop a memorandum of understanding concerning fish stocking in the wilderness.

(33d) Big horn sheep have been reintroduced on the North Slope of the Uinta. As for the rocky mountain goats, it is the call of the State as to whether a species is indigenous or not. They have determined that it is.

(33e) The EIS proposes a firewood standard (pg 2-26) which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience. Utilizing a quantifiable method, campfires would be restricted and only stoves allowed when monitoring indicated a unacceptable adverse effect on visual/tree resources.

Allen Williams
Friends of The Uintas
4112 West 6900 South
Kearns, Utah 84118

[illegible]

[illegible]
Forest Supervisor
Ashley National Forest
[illegible] Ave
[illegible]

[illegible] High Uintas Wilderness

[illegible]

[illegible] study, the Forest Service [illegible] in time. The High Uintas Wilderness [illegible] wilderness areas in Utah, yet you are [illegible]. The people of Utah simply want [illegible] the Forest Service taking an aggressive [illegible] the High Uintas Wilderness area? Twenty-three percent of the wilderness as Class-I is not a sign of aggressive [illegible]. 34a

The wilderness area should be viewed upon as a wild, pristine [illegible] and not a piece of real estate with commercial value. [illegible] suggestion that Class-I pristine areas should include all [illegible] of the High Uintas. In addition, I support [illegible] restrictions prohibiting open fires in the High Uintas Wilderness. 34b

[illegible] the Forest Service [illegible] address issues pertaining [illegible] management [illegible] native fish stocking [illegible] should be managed for native aquatic species. 34c
[illegible] phase out all grazing in [illegible] areas and reevaluate in adjacent areas in support [illegible] management [illegible] planning and management [illegible] native plant species [illegible] wetland & riparian area management [illegible] 34d

[illegible] Management should be [illegible] Friends of the Uintas endorse Alternative [illegible] 34e

[illegible] Class I - Pristine
[illegible] Class II - Moderate human influence
[illegible] Class III Heavily used

(34a)We feel the desired conditions statements and standards described on pages 2-2 through 2-27 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(34b)Some areas not grazed and not in Class I do not have Class I values for reasons other than grazing. Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways:

1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16 of the DEIS).
2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas.
3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed.

Important to this issue is the scale of soil and vegetation loss. Even in areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17.

The DEIS proposes a firewood standard which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience. Utilizing a quantifiable method, campfires would be restricted and only stoves allowed when monitoring indicated a unacceptable adverse effect on visual/tree resources.

(34c)Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4.

It is recognized that fish stocking invites excessive human use in some areas and that stocking can interfere with natural lake ecology. (Holden, et al. 1996). Assessment of the Effects of Fish Stocking in the State of Utah Past, Present and Future. Prepared for UDWR by BioWest Inc. Logan, UT PR-[illegible]

Your comments and all those regarding fish stocking in the HUW will be shared with DWR as negotiations proceed on an MOU.

(34d)This comment is in direct conflict with Congressional Grazing Guidelines which state "there shall be no curtailment of grazing in wilderness areas simply because an area is or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly phase out grazing."

(34e)Preference for Alternative 3 noted.

Please keep me abreast about issues relating to this document of record and other important issues that effect the High Uintas

Sincerely,

Allen Williams

Allen Williams
Acting Director
Friends of the Uintas

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Milton Hollander
2561 E Valley View Ave
Salt Lake City, Utah 84117
September 8,1996

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 N Vernal Ave
Vernal Utah 84078

Dear Supervisor Kulesza:

Re: DEIS for Management of the High Uintas Wilderness.

I have received and reviewed a summary copy for the above DEIS. Alternative 3,in my opinion,is the most desirable of the listed alternatives since it more nearly complies with the truer concept of wilderness. The following reasons are why I favor maximizing the areas devoted to wilderness: 35a

Large wilderness areas, if properly safe guarded from the incursions of human impacts, serve as a baseline for determining the health of our physical environment upon which we all rely. The flora and fauna which are indigineous to the wilderness areas need to be protected as a part of the baseline as well as air and water quality. 35b

At this point in time no human population limits appear to be under consideration by the entities that are able to effectively pursue such a goal. For this reason alone the need for many large areas of wilderness through out the world is imperative. If we have the foresight and backbone to retain these wilderness baselines then the problems of human over population may be more resolvable.

The concept of wilderness should priortorize eco-systems as close as possible to their status before human incursions became evident. Mankind is one of the most resourceful creatures to have inhabited the earth and with a wide range of values he holds for the earth and it's life-forms. Man is capable of being the most considerate creature on the one hand and the most thoughtlessly predatious and self serving on the other.

Here in this country we are fortunate at this time in not having the strife as found in Bosnia, the Middle East, Africa, and elsewhere.Much of the conflict is related in my view to over population and the resulting demands made on natural resources particularly by the so called advanced nations.I am well aware that political and short term economic interests displace reasoned accepted science in many decisions. However, one must hope our long term interests will prevail.

In the summer of 1994 I did several backpacks generally by myself in the Blacks Fork Drainages, Oweep, Lake Fork, and Beaver Creek.In

(35a)We feel the preferred alternative (incorporating the desired condition descriptions and standards described on pages 2-2 through 2-17) meets or exceeds the intent of the Wilderness Act and will protect all HUW resources for future generations.

(35b)Desired conditions described in the document determine appropriate human uses (as determined in the 1964 and 1984 Wilderness Acts) in order to maintain and support natural processes, natural appearance, and natural ecological role of fire. Flora and fauna (vegetation and wildlife) are addressed under desired condition, indicators and standards, and other places in the document.

the fourteen days in the back country I interfaced with one party of two. I saw moose regularly, deer several times, and one large herd of elk. This past summer a five day trip in some of the same area, as previously, we interfaced with at least six other groups not counting the sheepherder and his flock. One deer is all we saw of wildlife not counting birds this past summer. To me this is an indication that we may be over pressuring the animal life.

As a long time hiker and backpacker (since the 1950s) I adamantly believe that recreation and short term economic interests should be secondary in wilderness considerations even if my personal desires to utilize the wilderness must be regulated or restricted. 35c

The other four alternatives are too receptive to activities that negate wilderness by further indulging our proliferate use of resources.

Respectfully,

Milton Hollander

(35c)Your statement of belief is in line with the Wilderness Act. While recreation is one reason for the establishment of wilderness, the act is clear that natural processes and preserving the land for future generations take precedent over short term economic interests. Commercial activities are generally not permitted although exception is made for Outfitter Guide operations that serve the recreating public

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 56, Room 1003
P.O. Box 25007 (D-108)
Denver, Colorado 80225-0007

(36a) Your response is noted

September 9, 1996

ER 96/493

Mr. Bert Kulesza, Forest Supervisor
Ashley National Forest
355 N. Vernal Ave.
Vernal, Utah 84078

Dear Mr. Kulesza:

The Department of the Interior has reviewed the Draft Environmental Impact Statement for Management of the High Uintas Wilderness and has no comments. 36a

Sincerely,

Robert F. Stewart
Regional Environmental Officer

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Clifford Bove
13 Chestnut St
Glen Cove, NY 11542
Sept 14, 96

(37a)Sheep are permitted in accord with the Wilderness Act of 1964 and subsequent Congressional Grazing Guidelines that allow for grazing in wilderness. Presence of sheep and use of vegetation are within the Act and the Guidelines. Recent studies in Oweep Basin and Lambert Meadow indicate native plant communities of natural appearance dominate this area concurrent with grazing.

Dear Sirs,

I have just received the Quarterly Schedule regarding projects concerning the Ashley Nat'l Forest & Uintas Wilderness. I hope I'm not late for the deadline.

Two friends & I did a 4½ day backpack trip in late July of this year starting & ending at the East Fork of the Blacks Fork Trailhead. We traveled trail #s 103, 25 & 102.

We ~~[illegible]~~ thought the trailhead facilities were fine as well as the trail conditions.

We were just dismayed at the heavy grazing of Oweep Basin, Lambert Meadow & the meadows below Red Knob Pass (Lake Fork Side) by ~~[illegible]~~ hundreds upon ~~[illegible]~~ hundreds of sheep. The 37a

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meadows were trampled & ~~are~~ chewed to stubble[o] 37a
So I urge drastic reductions in the amount of sheep allowed to graze within the [illegible] [illegible] Wilderness because these high mountain meadows should have been vibrant & [illegible] with flowers & green leaves. [illegible] [illegible] public lands are allocated to [illegible] & sheep grazing without any benefit [illegible] the public & with much destruction [illegible] [illegible] natural wonders like the [illegible] Mountains. Please say no [illegible] [illegible] [illegible] Wilderness Management Plan.

Sincerely,
Skipford [illegible]

THE WILDERNESS SOCIETY

September 16, 1996

Bert Lindler, Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal, UT 84078

Dear Mr. Lindler:

On behalf of The Wilderness Society and its [illegible] members and friends, including [illegible] in the state of Utah, I am writing to comment on the Draft Environmental Impact Statement (DEIS) for the management of the High Uintas Wilderness. Designation and [illegible] of wilderness is central to the mission of The Wilderness Society, and our members [illegible] sportsmen, and general outdoors enthusiasts who are deeply committed to the preservation and wise management of our Nation's public lands. We consequently have great interest in the future of the High Uintas Wilderness, and the plan which is to guide its [illegible]. Furthermore, because this wilderness is a unique and stunning wild place of [illegible] in the State of Utah, its management is of great concern and precedent [illegible].

SUMMARY

The Wilderness Society strongly supports Alternative 3 as the most appropriate management proposal for the High Uintas Wilderness. We have grave reservations about the [illegible] will be a desired wilderness outcome, and would like to see the majority of lands in the High Uintas managed as Class II, the most pristine condition. We have strong concerns [illegible] address several vital and influential issues - grazing suitability and fish [illegible] in the DEIS. The lack of data provided on fish and wildlife and imperiled species [illegible] and calls into question the Forest Service's conclusion that all of the proposed alternatives are ecologically benign. Finally, the Society is very supportive of the DEIS's [illegible] to preserve the [illegible] in the High Uintas Wilderness ecosystem.

38a

38b

ISSUES

Human use must be managed to prevent unacceptable impacts on wilderness values, consequently the Plan's proposed Class III wilderness classification allowing for high human impacts should not be used as a desired outcome.

The DEIS describes three classes of wilderness which denote increasing degrees of human impact that are often applied across the landscape of the High Uintas Wilderness. In the words of the DEIS, "[t]he proposed action divides the wilderness into desired condition classes [illegible] desired wilderness conditions" (p. 1-2) emphasis added. Class I is described

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1660 LINCOLN STREET, SUITE 410, DENVER, COLORADO 80221
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(38a)The intent for all the classes described in this document has always been to comply with the Wilderness Act of 1964. The descriptions of these classes have been carefully analyzed and reworded to ensure compliance with the Act. Over the years it has become evident that those wilderness experiences being pursued by our visitors do vary within the spectrum of "wilderness opportunities" thus the different classifications. Refer to the Record of Decision for the rationale behind the decision.

(38b)Ecological condition of rangeland resources and suitability for livestock grazing for the HUW are addressed in Allotment Management NEPA documents and the Wasatch-Cache Rangeland Health EIS.

The Wilderness Act of 1964, states in Section 4 (d) (8), that, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish on national forests." The state has historically stocked fish in what is now the High Uintas Wilderness and has the right to continue to do it. They presently stock only lakes over 2 surface acres in size which they have historically planted. This is less than 50% of the lakes that size. The Forest Service is working with the UDWR in preparing a memorandum of understanding for fish stocking in the High Uintas.

Like most areas, there is not detailed data on fish and wildlife species, unless it is a species which is hunted or fished. Within a wilderness area, the impact on all wild species (both flora and fauna) will be people. By delineating the Class areas, it is known where the largest people impact will be (Class III), and in the proposed action (Alternative 1) this is 9% of the total wilderness. Alternative 1 calls to maintain current conditions across the wilderness except in Naturalist Basin and the west end of the Highline Trail, where it directs managers to bring the area up to wilderness standards. Any area that is "brought up to wilderness standards" will improve habitat conditions, that will benefit species that are there or might move into the area. Classes I and II, with less impacts by people, will have little effect on any species because of the acreages involved. Since people are the largest impact to wilderness, to benefit wildlife the most, you would have to limit people. This is an option that may be used in the future.

The Forest Service has written a biological evaluation for endangered, threatened and sensitive species that may occur in the High Uintas. This has involved informal consultation with the US Fish and Wildlife Service, and it has been determined that this action will have no effect on endangered and threatened species and that the viability of no species will be threatened.

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...ecologically pristine, while Class III at the other end of the spectrum is characterized by significant human influence. It is obvious that more impacts will occur where use is highest, and that people should expect such impacts in the vicinity of popular trailheads and destinations. We are concerned, however, that to the extent that these classes are prescriptive rather than merely descriptive, the management plan is espousing desired conditions that fail to meet the standards within the Wilderness Act. For example, the DEIS describes human impacts within Class III with such phrases as "[i]mpacts could last from year to year," "conditions that result in user conflicts are expected," and "outstanding opportunities for solitude or primitive or unconfined types of recreation are limited" (p.2-5). Such a description conflicts with the definition of wilderness contained within the Wilderness Act which states that wilderness "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable" and "has outstanding opportunities for solitude or a primitive and unconfined type of recreation." 38c

The Wilderness Society objects strongly to the premise that it is desirable or legal to sacrifice certain zones within wilderness areas as high-use areas which fail to meet the standard of wilderness -- instead of managing use to minimize negative impacts. The Forest Service Manual is explicit in directing the Forest Service to "not maintain internal buffer zones that degrade wilderness values" (p. 1-4). The manual also states that the Forest Service must "manage wilderness toward attaining the highest level of purity in wilderness within legal constraints" (p.1-5). Thus, to the extent that use levels and types are inconsistent with this wilderness threshold within the High Uintas Wilderness, the Forest Service is obligated to regulate or limit use, NOT lower the standard or change the definition of wilderness. Consequently, we urge the Forest Service to redefine Class III to an accentable level of human impacts, and then to regulate use accordingly. 38d

Many different strategies and techniques exist for regulating, discouraging, or otherwise minimizing use levels and subsequent impacts. For example, if an area is overcrowded, then instituting a permit or reservation system could alleviate such overcrowding and its resultant impacts, and should be established. To lessen impacts on vegetation at particularly popular and sensitive areas, stoves should be required and campfires banned permanently. We are supportive of the steps that the DEIS takes in this direction to curb erratic human behavior. In particular, we support the limiting of party sizes, and the elimination of camping in sensitive riparian areas -- such as around heavily-used lakeshores. Although minimizing regulation is consistent with the Wilderness Acts mandate to provide unconfined recreation, the desire to avoid rules and regulation should not be used as an excuse to allow deterioration or permanent harm to the wilderness resource. 38e 38f 38g

Less acreage should be designated in Class II and Class III of the proposed wilderness classification classes.

The Wilderness Society strongly supports Alternative 3 as the most appropriate alternative for balancing the preservation of wilderness values with the recreational enjoyment of the area by the public. The Forest Service Manual makes it very clear that whenever there are conflicts, the preservation of wilderness values must prevail. "Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value" (p.1.5). Given the uniqueness of the wilderness designation in protecting the last remaining areas of truly wild areas in our country, it is imperative that wilderness areas -- which are increasingly becoming islands of habitat within a developed and highly-altered landscape -- be managed to protect and preserve their pristine nature as intensively and

(38c & d)We believe the desired condition description of Class III meets the intent and the letter of the Wilderness Acts. The description has been reworded to ensure this

(38e)Many options exist amongst the variety of management actions available Actions need to be evaluated relative to other options for their ranking by the "minimum tool" concept, their cost, and the ability to be successfully implemented. The "minimum tool" concept implies that the minimum tool or management action chosen is appropriate and is only what is needed to protect the wilderness resource. Management actions run along a continuum from the benign, i.e., a sign, to law enforcement actions. This allows managers to use the "minimum tool concept" in choosing a course of action to address impacts. Enforcement through education is the preferred approach by the Forest Service. The EIS is not the proper vehicle for developing individual management actions. Management actions have to be decided on a case by case basis. Each drainage has has management concerns that need to be addressed individually. Some flexibility in choosing management actions need to be available to the wilderness managers.

(38f)Management actions run along a continuum from the benign, i.e., a sign, to law enforcement actions. This allows managers to use the "minimum tool concept" in choosing a course of action to address impacts. Voluntary permits are issued at the Mirror Lake trailheads and affect visitors to the popular Naturalist Basin. Registration boxes are being added to all trailheads on the south side and will serve as an information gathering tool. No plans exist at this time to institute a wilderness wide permit or designated campsite system. However, designated campsites at Grandaddy Lake are under consideration to allow badly damaged areas near the lake shore to be revegetated.

(38g)Management actions run along a continuum from the benign, i.e., a sign, to law enforcement actions. This allows managers to use the "minimum tool concept" in choosing a course of action to address impacts. Voluntary permits are issued at the Mirror Lake trailheads and affect visitors to the popular Naturalist Basin. Registration boxes are being added to all trailheads on the south side and will serve as an information gathering tool. No plans exist at this time to institute a wilderness wide permit or designated campsite system. However, designated campsites at Grandaddy Lake are under consideration to allow badly damaged areas near the lake shore to be revegetated.

extensively as possible. Given the descriptions of the desired outcomes of the DEIS's three proposed wilderness classes, we disagree strongly with the assertion that "[w]ilderness values will be protected within the general parameters of the Wilderness Act regardless of which alternative is selected" (DEIS, p.4-4). It is not acceptable that the preferred alternative, Alternative 1, provides only a minor change of course from the status quo and proposes to protect less than one-third of the High Uintas in a pristine condition. Alternative 3, which still proposes less than half of the wilderness area be managed in its primeval state, is the very minimum acceptable choice among those offered, and we strongly urge the Forest Service to alter its [illegible] 38h

The DEIS is flawed in failing to consider grazing capability and suitability as required in forest planning under the National Forest Management Act.

Regulations under the National Forest Management of 1976 (NFMA) require that "the [illegible] and potential capability of National Forest System lands for producing forage for [illegible] be determined during the forest planning process." The purpose of this analysis [illegible] whether an area is capable of being grazed (i.e., is there forage and can the [illegible]) and (b) whether grazing is an appropriate use of area given its likely economic and [illegible] impacts on other uses such as recreation, wildlife habitat, wilderness values.

The two forest management plans for the Wasatch Cache and Ashley National Forests, which [illegible] the management of the High Uintas, were approved in 1985 and 1986, respectively. Like virtually all forest plans of the time, these plans did not conduct adequate grazing capability and suitability analyses that included a comprehensive cost-benefit analysis of the environmental and economic costs of permitting grazing in each area of these forests. We therefore must disagree with the statement in the DEIS that "[t]he determination of which lands are available and suitable for grazing was made in the two Forest Plans" (p. 1-2), and the [illegible] that grazing could consequently be ignored in the DEIS. The relevant forest [illegible] that grazing is the most appropriate use of these lands (or at what levels) [illegible] and environmental tradeoffs are, and what other uses are precluded because [illegible] that the proposed wilderness management plan will be an amendment [illegible] these [illegible] that these forest plans are not slated for revision in the near future [illegible] addressed in the DEIS and comprehensive grazing capability and suitability [illegible] 38i

[illegible] 38j

[illegible] these two National Forests, and was identified as [illegible] document. To the extent that grazing is having a significant impact [illegible] Uintas Wilderness [illegible] in its management plan, the plan will fail to meet [illegible] and protecting wilderness values. Again, we urge the Forest Service [illegible] capability and suitability analysis for at least the wilderness portion of these respective forests so that multiple uses can be balanced in a meaningful way as mandated under the NFMA. 38k

The DEIS is remiss in failing to address the issue of non-native fish stocking and artificial enhancement of recreational fishing as part of the wilderness management plan.

The DEIS acknowledges that fishing is "[p]erhaps the most popular recreational activity in the High Uintas Wilderness" (p.1-12), yet the Forest Service has refused to address this issue

(38h)We feel the desired conditions statements and standards (as changed in the FEIS) described on pages 2-2 through 2-27 meet or exceed the intent of the wilderness Acts and will protect all HUW resources for future generations.

(38i)Suitability is discussed and mapped in the Forest Plan for the Ashley National Forest. Suitability as it relates to slope, available forage, and other biotic and abiotic features was the focus of numerous studies related to allotment management and the determination of suitable range based on these factors. While these studies did not address appropriate use in terms of conflict with other wilderness values, appropriate use is addressed in the Wilderness Act in Section 4 (d) (4) (2) by the following "the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue ..." Level of use is addressed in Congressional Grazing Guidelines by the following "It is anticipated that the numbers of livestock permitted to graze in wilderness would remain at the approximate levels existing at the time an area enters the wilderness system." Appropriate use in view of other values is also included in Standards and Guidelines in Forest Plans where directions and limitations are specifically given for grazing administration in Wilderness.

(38j)Grazing as a relevant issue has been addressed for many years in NEPA documents that are specific to individual allotments or groups of livestock allotments. This process is considered within the "normal grazing and land management planning and policy setting process" indicated in the Congressional Grazing Guidelines listed above.

The NEPA process for allotments is the same as for the High Uintas Wilderness EIS. Public scoping is conducted. Documents are subject to public review and decisions are subject to appeal. The inclusion of livestock grazing as a non-issue in the High Uintas Wilderness EIS does not omit opportunity for public input or appeal of decisions related to livestock grazing in the High Uintas Wilderness.

(38k)Grazing capability is the subject of numerous studies conducted on these National Forests within and without the High Uintas Wilderness. Suitability has been addressed in numerous studies. Past and continuing studies coupled with allotment planning and management and related NEPA documents is within the "normal grazing and land management planning and policy setting process" indicated in the Congressional Grazing Guidelines listed above. Appropriateness of grazing as it relates to social values is clearly addressed in the Wilderness Act and the Congressional Grazing Guidelines that followed the act. Mandates of NFMA are met through the NEPA process related to allotment planning and management.

in the DEIS. Instead the Service punts the issue in the DEIS with the explanation that the Regional Forester is developing a Memorandum of Understanding (MOU) with the State of Utah to describe standards for high lakes fisheries and habitat management for the High Uintas Wilderness (p 1-12). While we recognize that the State of Utah and the Forest Service have jurisdictional conflicts regarding stocking as well as historic roles and responsibilities that existed prior to the designation of the wilderness, this alone is not reason to take the issue out of the realm of public debate and input. The development of an MOU by state and federal agencies, outside of the wilderness management process, is of little reassurance to members of the public who want to participate in the development of this policy. Furthermore, the stocking policy for the High Uintas has and will continue to have a major impact on the levels and types of recreational use in the area, and thus is very relevant and essential to the development of a long-term management plan for the area. 38i

There are several issues of importance with regard to the stocking of fish in the High Uintas Wilderness. First is the issue of introducing and stocking non-native species in a wilderness area; second is the threat of introducing disease, such as whirling disease, through the stocking of hatchery fish; and third is the issue of enhancement of the native fishery above natural levels to artificially increase recreational opportunities -- all three of which clearly conflict with the wilderness concept of having natural forces prevail. Introduction of exotic species can have and often does have negative impacts on native fishes, as well as other aquatic species and the ecosystem at large. Augmentation of the natural fishery to provide additional recreational opportunities has large implications for use patterns and levels within the High Uintas, and consequently human impacts on environmental conditions wilderness values. 38m

Hendee et al., in *Wilderness Management* summarizes Forest Service policy with regards to fish stocking in wilderness as follows:

- "Introduction of exotic fish and animals prohibited."
- "Reintroduction [allowed] of wildlife species indigenous to the area which were extirpated by human-caused impacts, and to perpetuate or recover threatened or endangered species."
- "Stocking of indigenous or native fish allowed to reestablish or maintain an indigenous species adversely affected by human influence or to perpetuate or recover a threatened or endangered species (John C. Hendee, George H. Stankey, and Robert C. Lucas. Wilderness Management. 1990. International Wilderness Leadership Foundation. North American Press, Golden, CO. 546 pages.)

In other words, Forest Service policy is NOT to stock non-native fish in wilderness areas, and to only stock native fish where humans have extirpated them or where needed to recover threatened or endangered species -- NOT to enhance recreational opportunities. Furthermore, the Forest Service manual (2320.2) requires the Service to: "[m]aintain wilderness is such a manner that ecosystems are unaffected by human manipulation and influences so that plants and animals develop and respond to natural forces." For these reasons, The Wilderness Society feels strongly that wilderness values and natural forces should prevail in wilderness areas -- as required by the Wilderness Act. We do, however, also recognize that there may be legitimate recreational [illegible] angling opportunities which may not be possible without augmentation of the natural fishery. 38m

Precisely because the issue of stocking is a controversial issue which evokes strong [illegible] wilderness users, and because of the major implications that stocking has on the [illegible] the DEIS should address fish stocking in the wilderness plan. To do

(38l)Human induced degradation around lakes can be addressed through changing stocking locations or by regulating visitor traffic and use patterns. Standards defined in this decision, mark when conditions require management actions to stop degradation of soils and vegetation around lakes.

Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4.

The Wilderness Act of 1964, in Section 4 (d) (8), states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests." It is recognized that fish stocking invites excessive human use in some areas and that stocking can interfere with natural lake ecology (Holden, et al, 1996). For currently stocked lakes, these impacts to historic aquatic natural systems have already occurred.

The State of Utah affirms that "we will be developing a memorandum of understanding (MOU) with the Forest Service describing standards for fisheries and habitat management for the HUW." (HUW DEIS letter # 40). In this light the Forest Service will continue pursuing common ground in an MOU with the State to deal with the fish stocking issue.

(38m)Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4.

It is recognized that fish stocking invites excessive human use in some areas and that stocking can interfere with natural lake ecology (Holden, et al, 1996) ("Assessment of the Effects of Fish Stocking in the State of Utah Past, Present and Future, Prepared for UDWR by Bio/West Inc. Logan, UT PR-565-1).

The Wilderness Acts clearly support primitive or unconfined recreation opportunities (historically including recreational fishing) in the HUW. The direction in this document meets that intent.

All State of Utah hatcheries have been disease [illegible] years. The facilities are checked annually for these pathogens (per[illegible] conversation with C. Wilson, UDWR)

otherwise is to render the wilderness planning process incomplete and inaccurate, and to rob the public of a forum for participation in the decision-making process. We strongly urge the Forest Service to reconsider this omission.

The lack of ecological data provided in the DEIS makes it impossible to judge whether the proposed fish and wildlife management and monitoring provisions are adequate.

The DEIS notes that the High Uintas Wilderness contains habitat for three federally listed threatened and endangered species, 15 candidate and Forest Service sensitive species, and five additional indigenous or range-restricted species (p 3-8). The stated wilderness-wide desired condition is "[v]iable populations of indigenous High Uinta plants and animals are sustained, with emphasis given to threatened, endangered and sensitive (TES) species," and that "[n]atural process and the forces of natural selection determine the diversity of wildlife and fish habitat and species" (DEIS, p 2-3). [The Forest Service, however, acknowledges that baseline data for neotropical bird species, rate of stream bank erosion, and acres of habitat available to potential threatened and endangered resident species needs to be collected before standards can be set to meet desired conditions (DEIS, p 2-2). Because of this extensive lack of information, we must question how the Forest Service can nonetheless conclude that "the determination has been made there are no effects on the [Federally listed] species" and that the U.S. Fish and Wildlife Service has determined that "viability will not be threatened on any of the sensitive species under any alternative" (DEIS, p 4-23). Given that "the biggest impact on habitat effectiveness within the High Uintas Wilderness is the amount of human use" (DEIS, p 4-23), it seems that this missing ecological information would be essential to determining what levels of recreational use and where are appropriate.] 38n

In addition, we note that the Forest Service is obligated under the NFMA and the Endangered Species Act not only to protect listed species from jeopardy, but to help recover [illegible] to maintain viable populations of all native species in the forests. For example, the DEIS states that reintroduction of native cutthroat -- a sensitive species -- would require the removal of brook trout in some streams and lakes, and that the reintroduction of [illegible] in some areas would require the removal of fish (p 4-4). [Given the controversy surrounding the stocking of non-native fish, and the impact of these exotic species on native [illegible] species, it is all the more important that the DEIS provide more detailed information on [illegible] health of streams and lakes within the High Uintas so that the public can provide [illegible] in the decision making process. We therefore respectfully urge the Forest Service to collect and provide to the public more specific data on wildlife impacts, baseline data [illegible] species, and the impacts of recreation and fish stocking on native fish and wildlife as [illegible] sensitive and listed species before making final decisions on use levels and locations [illegible] wilderness area.] 38o

The proposed let-burn wildfire policy will help undo the ecological damage of decades of fire suppression.

[illegible] the Forest Service's recognition within the DEIS of the important role [illegible] in maintaining ecosystem health. "Fire is one of the primary natural ecological processes [illegible] an integral role in the maintenance of the wilderness ecosystem" (p 2-3). [The Wilderness Society is very supportive of the proposed provision to restore fire to the wilderness [illegible] allowing naturally-ignited wildfires to burn and using prescribed burning as [illegible] maintain historic disturbance regimes and natural succession processes.] This far- 38p

(38n)Under the proposed action, Class III areas (the heaviest used) includes 9% of the total area. Class II 68%, and Class I (the lightest used) 23%. The determinations made on viability were done knowing the total acreage of the wilderness area and the use patterns of the majority of the people, which is close to trails, especially in Class I, and II areas.

(38o)We agree, more specific data on these parameters will help us make more informed decisions regarding use levels and locations in the HUW. When this EIS was started the Forest Service was beginning to plot land type and other resource data in the GIS system, unfortunately lack of funding and conflicting timing left us unable to fully utilize this data for the EIS. However, the standards on pages 2-9 through 17 direct managers to monitor wildlife and other parameters to help us make better decisions for the wilderness resource in the future.

(38p)Your support is noted.

sighted policy will go a long way towards undoing the damage of decades of fire suppression which has led to increased fuel loading and the increased potential for catastrophic fires.

On behalf of The Wilderness Society and its members, I thank you for this opportunity to comment. We look forward to working with you in the future.

Sincerely,

Suzanne R. Jones
Associate Regional Director

Sept. 23, 1996

To Whom It May Concern:

Re: Draft Environmental Impact Statement
High Uintas Wilderness Forest Plan Ammendment

After reading through the summary of the Draft Environmental Impact Statement I agree with the preferred alternative, Alternative 1, with some additional thoughts that I hope you will consider. It may be that the questions/concerns I have are already addressed in the Impact Statement, however, I'll mention them anyway. 39a

In 1958 I began working as a seasonal employee on the Ashley National Forest and continued this each summer until I received a degree in Forest and Range Management from Utah State University in 1960. I then became a fulltime employee with my first assignment to do Range Allotment Analysis in the High Uintas Primitive Area. At that time we seldom seen any visitors in the High Uintas. About the only human beings we ever encountered during the 60-day summer season were the sheep herders.

I received a District Ranger appointment in 1964 and transferred off the Ashley. In 1970 I was transferred back to Roosevelt as District Ranger and remained there until December 1978.

Upon returning to the Ashley I was greatly shocked by the tremendous increase in visitors to the High Uintas; however, the Uintas were then being considered for wilderness status and every environmentalist in the country wanted to visit them. Camp sites that were hardly recognizable as such in the late 50's and early 60's had literally become dust beds and all the traffic was foot traffic from back-packers.

That is all in the past and cannot be changed, now for my thoughts/concerns.

The recommended overnight group size maximum of 7 people and 7 stock is my first concern. During my tenure at Roosevelt I visited the High Uintas by way of Lake Fork, Yellowstone and Uinta Canyons and crossed back and forth from one drainage to another during most of those visits. Many times I had inspectors and/or visitors with me from the Supervisors Office, Regional Office, Utah State University and Texas A&M. On nearly every one of these trips there were more than 7 people present. When the group from Texas A&M and the people from the Supervisors Office went through, if I remember correctly, there were 12 people plus I and my wife who did all the packing for that group. 39b

I presently know two families that pack into the High Uintas Wilderness each summer for a one week outing. There is a total of 9 people in one of those families and 11 in the other. My question is: Are you going to limit the size of the Forest Service inspection teams and the numbers of individuals from the various 39b

(39a)Preference for Alternative 1 noted.

(39b&c)Presently registration information suggests that between 10-20% of the visitors to the HUW use stock and 5-20% of those are using more than 7 head of stock.

According to the literature (Cole, 1989), popular guide books (Davis and Veranth, 1993) and Leave No Trace publications (Harmon, 1994), in more pristine areas large groups can cause greater resource impacts. The Class I desired condition description challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted.

Stock users who choose to travel in Class I accept the responsibility to travel lightly and in small groups.

The Forest Service adheres to these groups size limits also.

242

Universities who may want to visit the Wilderness? 39b

My next concern is 7 stock for 7 people. I have packed through the High Uintas and also the Gros Ventre on the Bridger-Teton National Forest many times. My experience has been that it requires one pack horse for every 3 people. Seven people will need 7 saddle horses and maybe they could get by with 2 pack horses if they were only going to stay a couple of days but if they were going to stay the week they will need, at least, 3 pack horses. 39c

I agree there should not be too many trails but trails are absolutely necessary to access the High Uintas. The Shale Dugway in Uinta Canyon slides full every winter and if you have ever tried to cross that area horseback before the trail tread is re-established you will only want to try it once. 39d

I am not familiar with the north slope of the Uintas with the exception of from Dollar Lake up over Gunsight Pass to the High Line Trail north of Kings Peak but I cannot see how that area can be managed or even accessed without a trail in each of the main drainages and the High Line trail to tie the whole country together. 39e

I appreciate the oppertunity of reviewing the summary draft statement and hope that my thoughts will be of some value.

Sincerely

Ronald Lisonbee

Ronald Lisonbee
Range Consultant

(39c)Trails serve an essential purpose to allow access into the wilderness and protect the wilderness resource from erosion and the development of meandering trails.

(39e)There is no plan to eliminate major access trails. In Class I areas, there will still be trail corridors to access the drainages.

State of Utah

GOVERNOR'S OFFICE OF PLANNING AND BUDG.
Resource Development Coordinating Committee

September 18, 1996

Bert Kulesza
Ashley National Forest
Vernal Ranger District
355 North Vernal Avenue
Vernal, Utah 84078

SUBJECT: DEIS for the Management of the High Uinta Wilderness
State Identifier Number: UT960711-030

Dear Mr. Kulesza

The Resource Development Coordinating Committee (RDCC), representing the State of Utah, has reviewed this proposal. Comments from State agencies are as follows

Division of Wildlife Resources

As stated in the document, we will be developing a memorandum of understanding with the Forest Service describing standards for fisheries and habitat management for the High Uintas Wilderness Area 40a

We look forward to continuing working with the Forest Service on this matter. If you have any questions, contact Jack Lytle in our Northeastern Regional Office at (801) 789-3103

Division of Water Resources

Irrigation companies, conservancy districts, state and federal water agencies, etc., that develop, measure and use water resources have had a long established working relationship with the Forest Service. Because a large part of the runoff to our streams and river originates on Forest Service lands, it has been necessary for the Forest Service and those entities who ... to make good arrangements to measure, divert, convey, and store water on Forest Service lands. Wilderness designation and management have eliminated, changed, and/or hampered the ability of these entities to continue to measure, develop and use these water resources. It is the opinion of Water Resources that any management plan in areas managed by the Forest Service should be managed to preserve to the fullest extent possible under the law the opportunity of these entities to measure, manage and use these resources. 40b

(40a)We anticipate continuing our good working relationship with the State to tackle this issue.

(40b)Designation of the High Uintas Wilderness in 1984 serves to protect perhaps the most valuable resource in these mountians: the watershed. One purpose of this management plan is to enhance this protection for all resources in wilderness

Irrigation reservoirs in the wilderness that were under permit at the time the Utah Wilderness Act was passed are legal, and can be used for their established purpose as long as the need exists. The act also allows for their maintenance, using motorized or mechanical means, if it is determined through analysis that these are the minimum tools needed to do the work. The Forest Service retains the decision authority on when and under what circumstances motorized or mechanical tools may be used

(40c)Some of these issues were discussed due to recent analysis in CUP environmental documents

Nothing in this planning document changes or attempts to change any water rights

The DEIS seems unclear on its approach to dealing with these issues. On page S-3, it identifies water rights, stabilization of dams and hydrometerological data collection sites as issues but includes them in a group of issues that was either judged to be outside the scope of the analysis, outside legal limits to consider, outside the authority of the Forest Service to administer, or not necessary to build a reasonable range of alternatives. It was not identified which category applied to the water rights, etc. issue. The main point is, however, the DEIS does [illegible] discuss and make decisions about some of these issues. It is [illegible] necessary to comment and at times take issue with the DEIS's position. 40c

[illegible] how Class I, Class II, and Class III affect these issues. It [illegible] Division of Water Resources that Class I or Class II not be used to restrict [illegible] collection sites in the Uinta wilderness area. Or in other words, [illegible] and other related water resources activities are permitted by [illegible] this management plan should not be used to restrict using Class I or II [illegible]. On page S-11, paragraph 9, it states that although [illegible] procedure so is the use of helicopters and other equipment for [illegible] emergency repair. This should be noted and allowed as are for [illegible] 40d

[illegible] and predicting functions outside the wilderness [illegible] with CUP on the replacement projects. We support [illegible] these projects but strongly disagree that the management plan for the High Uinta wilderness should have any kind of specific policy to relocate water use and [illegible] of wilderness areas. The language in paragraph 9 should include the [illegible] to establish, relocate (inside), and upgrade as well as relocate [illegible] 40e

[illegible] comments concerning SNOTEL and other measurement [illegible] below as part of these comments. The Lightening Lake SNOTEL [illegible] High Uinta wilderness area. It is now impossible to accurately [illegible] Rock Creek Upper Still Water Reservoir inflow. Water to the Wasatch Front [illegible] accurate and timely forecast. Rock Creek drains a large area [illegible] west to Clement Mountain on the east. Since the Lightening Lake [illegible] the forecast for Rock Creek has been very poor [illegible] the Lightening Lake site.

[illegible] on the north side of the High Uintas needs to be updated [illegible] precipitation gauges and water content snow course sites are [illegible] forecasting High Uinta mountain streamflow. Many thousands [illegible] would be totally wasted. Forecast accuracy of the High Uinta [illegible] be reduced by 50-60 percent (flooding of dams such as Moon Lake and Upper Stillwater) could cause extensive damage to people and livestock who live below the reservoirs.

(40d) The 1984 Utah Wilderness Act allows for the installation and maintenance of hydrometeorological data collection sites where such facilities are essential to flood warning, flood control, or reservoir operation purposes. Once it is shown that these sites are "essential" to the specified purposes, they can be approved. The actual location will be negotiated and will not be restricted by the opportunity classes. By definition, the area where a site is located will be reclassified as class III, because it will no longer meet the criteria for class I or II.

Because snow measurement devices are permanent fixtures on the landscape, the ID Team determined that they most appropriately fit in Class III areas.

The Interagency Agreement of 1991 between the Natural Resource Conservation Service, previously the Soil Conservation Service, and the Forest Service directs operations and maintenance activities for the hydrometeorological measurement sites in the HUW. Items in that agreement are not discussed further in this document.

(40e) Previous agreements between NRCS and the Forest Service to move snow measurement devices outside the wilderness when proper correlation has been determined will continue to be honored. The Forest Service will continue to encourage efforts to correlate the data to other sites outside the wilderness and promote the use of new technologies to gather data.

Assuming the proper approvals, the opportunity to add, re-establish, and relocate inside the wilderness as well as relocate outside the wilderness exists, but only if it can be demonstrated that the site is "essential" to flood warning, flood control, and water reservoir operation purposes. The word "essential" in the act is a strong word, and was purposely made so. It is the position of the Forest Service, that once another method to obtain the necessary data is in place that existing hydrometeorological sites in the wilderness are no longer essential and should be removed.

The Uinta Basin Replacement Project (UBRP) portion of the Central Utah Completion Act has, as part of it's mandate, to stabilize reservoirs in the wilderness if facilities are built which will allow transfer of water storage rights. The Draft Environmental Impact Statements for the Uintah and Upalco units of the UBRP project propose the construction of reservoirs which will allow the transfer of storage rights, and propose the stabilization of all special use reservoirs in Yellowstone, Swift Creek, and Uinta Canyons.

These reservoirs will be stabilized at a level that more naturally reflects the preconstruction conditions, and allow natural streamflow processes to reoccur. The reservoirs must be stabilized at a level that poses no hazard, requires no maintenance or inspection, and requires no permit. The actual level of the lake that will meet these conditions will vary by site. Some lakes may be slightly larger or smaller than the original conditions, depending on what must be done at each site to meet the no hazard criteria.

[illegible]
[illegible] of the High Uinta Wilderness

[illegible] are located high in the watersheds near Five Point Lake and in the headwaters of [illegible] Lake, Fox River, Snow courses, Snotel sites, and aerial markers are located on the Uinta, [illegible] Henry's Fork, and Lake Fork Rivers. Henry's Fork is the only snow course and [illegible] over that remains in the High Uintas wilderness area on the north slope of the High [illegible] Fox needs to be upgraded to an automatic on-call Snotel site. There are two [illegible] snow course and one aerial marker located in the High Uinta wilderness [illegible] batteries and solar panel operated and require recharging and [illegible]. Emergency maintenance will require helicopter flight or ground [illegible] into the High Uintas wilderness to repair the electronic [illegible]

[illegible] opportunity to review this proposal. Please direct any [illegible] correspondence to the Utah State Clearinghouse at the above address or [illegible] John Harja at (801) 538-1559.

Sincerely,

Brad T. Barber
State Planning Coordinator

[illegible]

40f

(40f)Chapter 3, the affected environment section, has been changed to reflect the actual conditions.

The site on Henry's Fork may be upgraded to an automatic, on call Snotel site if it can be demonstrated that such an upgrade is essential for the stated purposes in the Act.

41a

41b

41c

(41a)The HUW will be managed according to the Wilderness Act. The desired conditions, standards and criteria developed will are designed to protect fish, wildlife and plants including all threatened, endangered, and sensitive species. They will also insure the protection of the soil, water, and air resources.

Designated wilderness is not, however, a sanctuary. The Wilderness Act specifically states that a primitive and unconfined recreation experience is one of the values wilderness has to offer. The act also says that wilderness should provide opportunities for solitude, but it does not say that solitude must be provided everywhere.

(41b)Livestock grazing is a legitimate use of the wilderness according to the 1964 and 1984 Wilderness Acts. It is now illegal to locate a mining claim in the wilderness, however, claims that were valid prior to December 31, 1983 remain so. These claims may be operated based on an approved Plan of Operations and procedures specified in the mining and wilderness regulations. Aircraft overflights and ceilings are the responsibility of the Federal Aviation Administration. Working with this agency, it is possible to put overflight or ceiling restrictions in certain areas when justified (non-native species).

(41c)Designation of new wilderness lands is the responsibility of Congress and is not within the scope of this analysis.

September [illegible]

[illegible]
Forest Supervisor
Ashley National Forest
355 N. Vernal Ave
Vernal, UT 84078

[illegible]

[illegible] the opportunity you have extended to me to comment on the proposed [illegible] High Uintas Wilderness. I received a "summary" statement of the proposals and respond to the extent of my understanding of these proposals for the preservation of our national wilderness.

Having read the five alternatives, I am in favor of Alternative #1. Over the past twenty years I have hiked and explored many of the great ridges, peaks, and basins of the High Uintas. These mountains are a national treasure. My enthusiasm for their protection nearly caused me to embrace the tenets of Alternative #3. However, it is clear to me that the status quo approach to managing this natural resource will eventually lead it into further destruction. To provide for the revitalization of this wilderness will be a formidable task. Planned management of the region will be a permanent necessity. 42a 42b

As a side note, I am in favor of the toll road concept being proposed for the Mirror Lake Highway. I believe day use permits and multiple day use permits should be purchased by visitors to increase forest service personal presence and maintain [illegible] public services. I see this region as no less important than our existing national parks.

Best wishes as you engage the public in this educational process. I applaud your effort.

Sincerely,

[signature]

Larry E. Brewer
4306 Daisy Drive
Mountain Green, UT 84050

(42a)Preference for Alternative 1 noted.

(42b)We agree planned management will be a permanent necessity as will be monitoring. There are areas of concentrated use that are of concern. Maintaining or achieving desired conditions as listed in the EIS will provide protection for resources. However, overall resource conditions in the High Uintas Wilderness do not support a concept that major revitalization is necessary. Plant communities, soil conditions, water quality, and other basic resources are indicated to be in high ecological conditions except in relatively few and small areas. The Shale Creek area of the Duchesne River Drainage offers a view of conditions where livestock have never been permitted and where human use has been very low. The Shale Creek Research Natural Area in the Uinta Drainage offers a view of conditions where few if any livestock have grazed and where human use has been very low. General comparison of vegetation and soil in these areas with other areas in the Wilderness show very little obvious differences in plant composition, abundance, or vigor. This comparison indicates resources can be protected with some use.

However, your assessment of formidable does seem applicable in areas of traditional high use. The patterns of historic use and the values of people who frequent these areas do present a challenge for wilderness management.

Peter Hovingh
721 Second Avenue
Salt Lake City
Utah 84103

August 20, 1996

Bert Kuleza, Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal
Utah 84078

Concerning the DEIS for management of the High Uintas Wilderness

Concerning the aquatic resources

One aspect of the Uinta Mountains, and in this respect comparable to the ranges of the Rocky Mountains in Colorado and Montana and contrast with the Wasatch and Great Basin and Sierra Nevada ranges, is the high variability of the aquatic resources, namely, lakes. The view presented in the DEIS lumps all lakes as put and take exotic fisheries but acknowledges that not all lakes have put and take fisheries. However, all lakes that can support fish for one or two winters are managed for exotic fishes. The consequence of this management is that there is a fishermans trail around each of these lakes complete with worm tins, gut lines, fire rings, and impacted riparian zones. Converting these lakes to fishless lakes or to close the lakes to the public would greatly improve this wilderness area. 43a

The lakes in the Uinta Mountains consist of drainage lakes (largely impacted by exotic fisheries), semidrainage lakes (identified by their yellow pond lilies), nondrainage lakes (identified by total lack of drawdown and ring of dead trees from the high precipitation years of the early 1980's) and seasonal lakes (identified by their dryness in late summer). Prior to man's manipulations of these lakes by exotic fish introductions, each of these lakes contained unique fauna. The drainage lakes contained western tiger salamanders- salamanders that specialize in reproductive facultes at the expense of terrestrial capabilities. It is suspected that managing these lakes for put and take trout has caused these forms of amphibians to disappear as well as the boreal toad (where the tadpoles winter over in lakes) and frogs (in Kings Canyon National Park where tadpoles winter over in lakes). The semidrainage lakes presently contain the terrestrial salamanders and Erpobdellid leeches. The ephemeral lakes are utilized by the chorus frogs. The nondrainage lakes are clustered in the north slope of the Uinta Mountains and contain the gastropod *Hotisoma*. 43b

The fauna contents of the lakes in the Uinta Mountains themselves depend upon geographic features. The lakes in the southeast portion of the Uinta Mountains do not

(43a)We acknowledge that fishing is a major attraction that draws many people to the wilderness and fishing in some places is associated with concentrated use. There is a need to deal with this issue. However, converting lakes to fishless status would require agreements with UDWR as explained on page 1-12

(43b)Lakes being managed for a put and take fisheries are those over 2 acres in surface area that have been stocked traditionally. Loss of other species caused by these stocking activities would have occurred several years or decades ago. The Forest Service will be working with the UDWR in preparing a memorandum of understanding to identify a definite policy on fish stocking.

have the same fauna as the western and northern Uinta Mountains and this difference is accessibility since the glacial periods. I have not yet determined the western boundary of this southeast geographic zone and it may well be the Yellowstone River drainage.

Thus to view lakes in the Uinta Mountains has put and take exotic fisheries hides from the public the uniqueness of the lakes and their faunistic responses. It was determined early in the DEIS process that exotic fisheries in wilderness would not be an issue. However, there has never been an environmental impact statement on fish management in the U.S. Forest Service jurisdictional lands which does include habitat management. Although the U.S. Forest Service and the Utah Department of Wildlife Resources will be developing a Memorandum of Unuerstanding, MOU's have never involved the public nor do they involve amphibian biologists (who are ignored by the fishery managers) or limnologists or conservation biologists. There will have to be changes in attitudes in the future such that wilderness areas will not be used, but which one may become a part of the experience (and that part does not automatically include put and take exotic fisheries). 43c

Sincerely,

Peter Hovingh

(43c)Being a catalyst to change attitudes toward wilderness is beyond the scope of this project. People appreciate wilderness for many reasons, and some of these reasons are for the legal uses that may take place. Visitors always take something with them when they leave, even if it is just pictures or memories. As long as hunting and fishing are valid and legal uses, many folks will enjoy the wilderness for these purposes.

August 21, 1996

Dear Mr. Kulesza:

Upon receiving a summary of the Draft Environmental Impact Statement (DEIS) for Management of the High Uintas Wilderness, I am submitting the following comments:

First of all, I want to applaud the Forest Service for undertaking this project as I strongly believe something must be done to prevent the High Uintas Wilderness (HUW) from literally being loved to death. However, upon reviewing the various alternatives presented, I really don't think Alternative #1, which is the Forest Service's preferred, is that much of an improvement over the status quo, as it still puts recreation as the highest priority for the HUW's existence. This, I believe is a mistake. As you will probably agree, things like ecological integrity, naturalness, unparalleled wildlife habitat, water quality, etc., are all very important attributes of a wilderness. Granted, human recreation is important, but, in my opinion, it is secondary to the "pristine naturalness" of the area which should be the main attraction for human use in the first place and if that "pristine-ness" is overly-compromised by too much use, too many trails, etc., then the wilderness becomes a giant human playground instead of a refuge or sanctuary for natural conditions. 44a 44b 44c

Anyway, my point is, the Forest Service ought to take the courage to stand up to all of the recreational fishermen, hunters, and even hard core backpackers or climbers (which I believe make up the majority of commentors), who seemingly believe wilderness protection is only an anthropocentric concept designed to fulfill human recreational needs, by implementing most of the management provisions outlined in either Alternative #3 or #4, plus a few more that I will list later in this writing. By doing this, I believe a truly "holistic ecosystem approach" will occur and it will help to ensure the long term survivability of all of the species that naturally belong in the Uinta Mountains, (not just those that are the most fun to hunt), and most especially those inhabiting the High Uintas Wilderness Area. 44d

Besides, this is what people should desire in a wilderness area. It is my understanding that even the Forest Service Manual defines "wilderness management goals" as (1) wildernesses are to be managed to attain the highest level of purity, (2) preserving the

(44a) We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(44b) At the time the Ashley and Wasatch-Cache National Forest Plans were approved in the mid 1980s, most wilderness areas were managed primarily for the recreational benefits they might provide. While this is still a major focus for wilderness managers, it is now recognized that the maintenance of wild ecosystems for values other than those more directly related to human use should also be an important consideration. This analysis and the decisions that result, fulfill a need to articulate this shift in national policy for wilderness management in the High Uintas. Desired condition descriptions in this document determine appropriate human uses (as determined in the 1964 and 1984 Wilderness Acts) in order to maintain and support natural processes, natural appearance, and the natural role of fire.

(44c) Desired conditions described in the document determine appropriate human uses (as determined in the 1964 and 1984 Wilderness Acts) [illegible] and support natural processes, natural appearance, and the natural role of fire. Management based on desired conditions will provide for natural conditions.

(44d) We feel the preferred alternative [illegible] descriptions and standards described on pages 2-2 through 2-17 [illegible] exceeds the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(44e) [illegible] reasons other than grazing. Designation of Class III [illegible] management of the High Uintas Wilderness [illegible]

1. It [illegible] unaffected areas are first time or infrequent [illegible] pages 3-17 and 3-18 of the DEIS.

2. It [illegible] which will facilitate solitude in these areas.

3. It provides an opportunity [illegible] educational programs where they are most needed.

Important to this issue is the scale of soil and vegetation [illegible] areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable.

Soil and Vegetation loss and other impacts are addressed [illegible] standards as given on pages 2-9 through 2-17.

wilderness resource is the overriding value--not economy, convenience, commercial value or comfort, and (3) ecosystems are to be unaffected by human manipulation so that ecosystems respond to natural forces, not human-induced management. To me these definitions make perfect sense! Please do everything in your power to implement these provisions.

Additionally, I have some other suggestions that were not adequately addressed in the DEIS. These are as follows:

(a) Class I areas should include all ungrazed portions of the High Uintas--such as, Naturalist Basin, Grandaddy Basin, Four Lakes Basin, Squaw Basin, East Basin, Amethyst Basin, the Uinta River, the middle reaches of the Yellowstone River on the South Slope and Beaver Creek to Burnt Fork. 44e

(b) include the issues dealing with fisheries management, especially with regard to having all Class I watersheds be managed for native aquatic species with a possible phasing out of the non-native "put-and-take" recreational-based fisheries, and supporting the proposed Yellowstone River Colorado Cutthroat Trout Refugia as outlined by the Utah Wilderness Association. 44f

(c) Possibly phase out domestic livestock grazing in the wilderness over the next 10-20 years so as to ensure a safe environment for bighorn sheep and predators. 44g

(d) Campfire restrictions in Class I areas should be similar to those in Naturalist Basin. 44h

(e) Look at enforcing the Forest Service's own outfitting and guiding criteria--possibly placing more restrictions on them. 44i

In short, I would like to reiterate that I hope the Forest Service doesn't do anything that doesn't make good "biological sense", even if the majority of commentors may indicate they want to make the High Uintas a giant human playground without much restriction. Please make sure natural ecological integrity is not sacrificed for the sake of pleasing a few fishermen, hunters, or even "hard-core" backpackers. Thank you for your attention.

Sincerely,

James W. Thompson

James W. Thompson
3861 South Viking Road
Salt Lake City, Utah
84109

(44f)The Wilderness Act of 1964, states that, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests." The stocking of fish is a state responsibility. The Forest Service will be working with the UDWR to develop a memorandum of understanding on stocking in the wilderness area. This MOU will outline responsibilities and policy agreed to by both agencies on the stocking issue. The proposal for a refugia would be a cooperative effort between the State and the Forest Service. It would include a complex process of agreements, implementation plans and enforcement and it has been decided that it will not be undertaken at this time.

(44g)The wording "phased out" is in direct conflict with Congressional Grazing Guidelines which state "there shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to "phase out grazing". The Congressional Grazing Guidelines clearly place this comment beyond the scope of the EIS.

(44h)The EIS proposes a firewood standard (pp. 2-16) which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience. Utilizing a quantifiable method, campfires would be restricted and only stoves allowed where monitoring indicated a unacceptable adverse effect on visual tree resources.

(44i)The purpose of outfitter/guide permits is to furnish opportunities to the public to enjoy aspects of the National Forests that they would not otherwise be able to receive. Wilderness outfitter/guides are required to teach their clients wilderness ethics and leave no trace camping techniques (standards that many non-guided users are not willing to do or do not learn on their own). Outfitter/guides have many restrictions placed on them through their permit to operate on National Forest System lands. These requirements are to ensure that safe and quality service is provided to the public. Additional restrictions are not necessary.

[illegible] Natural Resources Conservation Service
P. O. Box 11350
Salt Lake City, UT 84147
Telephone (801) 524-5051

[illegible] DEIS [illegible] Management of the High Uintas Wilderness

Date: August 19, 1996

File Code: [illegible]

[illegible]

[illegible]

[illegible] Draft Environmental Impact Statement, High Uintas Wilderness Forest Plan [illegible] Natural Resources Conservation Service, USDA, Snow Survey Program has [illegible]

1. [illegible] page [illegible] last paragraph, first sentence, the draft currently reads "Visitors may come [illegible] contact with water impoundments or snow measurement devices." This should be changed to read: "Visitors may come in contact with water impoundments or hydro-meteorological [illegible] devices." 45a

The reason for this change is that at SNOTEL sites, much more information than just "snow [illegible]" are collected. These currently include precipitation, temperature, depth, and [illegible] wind, solar radiation, fuel moisture, soil moisture and temperature, etc.

2. On page [illegible] and [illegible] in the table of existing conditions in the "Rock Creek" column [illegible] SNOTEL sites, it is listed as having one (1) SNOTEL site. The current Rock Creek SNOTEL [illegible] is below the Stillwater dam, outside of the Wilderness area and therefore [illegible]. This of course assumes that Rock Creek is the SNOTEL site of the [illegible] SNOTEL site, Lightning Lake, within the Rock Creek basin which [illegible] should be the referenced site. 45b

3. [illegible] the table of existing conditions in the "Henry's Fork" column [illegible] as having "none". While this is technically correct, we [illegible] and a Snow Aerial Marker that is within the wilderness [illegible] hydrometeorological data we have in this area and it is critical for [illegible] in Henry's Fork. It should be reflected in the existing [illegible] 45c

4. [illegible] page [illegible] paragraph [illegible] Water Rights, stabilization of dams and hydrometeorological [illegible] states: "There are presently two hydrometeorological data collection sites

(45a) Typo is corrected

(45b) Typo is corrected

(45c) Typo is corrected

in the High Uintas Wilderness." this should be changed to "There are presently three (3) 45d
hydrometeorological data collection

(45d)Typo is corrected

There are four (4) SNOTEL sites on the south slope - Five Points Lake and Lakefork Basin. There is also a smaller data collection site on Henry's Fork on the north slope that should be recognized as a "hydrometeorological data collection site", for a total of three (3) sites within the wilderness boundaries.

Thank you for the opportunity to comment on this issue.

Sincerely,

RANDALL P. JULANDER
Snow Survey Supervisor

cc:
Phillip Nelson, State Conservationist, USDA, NRCS, Salt Lake City, UT
Marvin O'Dell, Asst. State Conservationist, USDA, NRCS, Salt Lake City, UT

ROCKY MOUNTAIN RECREATION OF UTAH, INC.
P.O. BOX 680846
PARK CITY, UTAH 84068
(801)645-7256

[illegible]

[illegible]
[illegible] Ranger
[illegible] Ranger District
[illegible]
[illegible]

[illegible]

[illegible] the U-Bar Ranch's response to the Draft Environmental Impact Statement regarding future management of the High Uintas Wilderness. I have learned [illegible] U-Bar some 4 years ago, but realize that almost everyone else involved in this process has a great deal more knowledge in this area than I.

[illegible] meeting on the night of September 10 in Roosevelt shed much light [illegible] outfitters' general concerns regarding this plan. However, I do not feel very [illegible] with the very agency that is vital to the future of the U-Bar Ranch. We have tried very hard to create a strong partnership/relationship with the USFS and [illegible] this communiqué to negatively impact on that relationship. One [illegible] the U-Bar Ranch cannot be successful without the support of our District [illegible] USFS.

[illegible] attempt to present our comments regarding this DEIS.

[illegible] U-Bar, the LAC process was in progress. I attended [illegible] understood what was going on. Amongst the outfitters [illegible] there seemed to be a general consensus that their input was not given [illegible] that the results of this exercise were biased against the [illegible] this industry. I am unable to draw my own conclusion [illegible] outfitters/guides who followed the LAC [illegible]

[illegible] preconceived thoughts. I have attempted to [illegible] the comments made by both sides at our Sept [illegible] the basic premise that "human presence [illegible] the wilderness [illegible] solitude and primitive recreation" is simply not [illegible] what facts exist that support this premise. We [illegible] that was not totally in awe of what they saw and [illegible] gentleman, Al Fleming, into the Chain Lakes [illegible] last in the Chain Lakes in 1944 when he was 8 [illegible] thing had changed!" This seems to me to be the entire [illegible] We [illegible] our wilderness is being threatened by overuse? Our [illegible] the average citizen. I think we all know what [illegible] 46a

(46a)Perhaps in a romantic view any human presence or trace in the wilderness seems unacceptable. Untrammeled by man is a phrase used in the Wilderness Act of 1964. The interpretation of untrammeled can be expected to vary. Use of wilderness by the American people was included in the Wilderness Act of 1964 with direction that this use should be such that natural conditions are maintained. Also included in the definition of wilderness in the Act are areas that generally appear to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable. The words "generally", "primarily", and "substantially" do not support a romantic or puristic view that any trace of human presence is unacceptable. The intent of the Act seems to allow use while maintaining inherent values.

Random sampling in the Wilderness seems to verify your point of view that generally the wilderness is not being over used. The Shale Creek area of the Duchesne River Drainage offers a view of conditions where livestock have never been permitted and where human use has been very low. The Shale Creek Research Natural Area in the Uinta Drainage offers a view of conditions where few if any livestock have grazed and where human use has been very low. General comparison of vegetation and soil in these areas with other areas in the Wilderness shows very little obvious difference in plant composition, abundance, or vigor. There are areas of concentrated use, but from an overall ecological or watershed standpoint, overuse does not seem to be verified.

However, there are some areas of concentrated use where the imprint of man is quite noticeable. Concentrated use in these areas is an issue that needs to be addressed in site-specific planning and management of the High Uintas Wilderness.

As an outfitter/guide, I am concerned with the amount of attention paid to our small industry in light of our actual use and impact as compared to the general public. If I accept your premise that over-use exists, it seems ridiculous that this document would suggest cutback on the element (outfitters/guides) that represents a minuscule 7/10 of 1% of the total use and, at the same time, no management of the element (public) that represents 99.3% of the use? Who is kidding who? 46b

I would like to believe that the relationship between the outfitters/guides and the USFS is as described in the DEIS: "Outfitters permittees exist on national forest system lands because the agency desires their assistance in accomplishing management goals and objectives, they are an agent to provide services to the public. The relationship between the Forest Service and an outfitter is one of a "partnership". This statement sounds great but, quite frankly, is not supported by the recommendations of this DEIS. In any partnership both parties must realize success and this document poses a serious threat to the future of outfitters/guides in the High Uinta Wilderness. 46c

Specific to the U-Bar, we have invested over $150,000 in improvements to create a high quality experience for our guests. New water system, septic system, complete renovation of cabins and lodge along with new dining room and new commercial kitchen are all now complete and available to our guests. At the same time that this investment and work was going on, our wilderness visitor days were arbitrarily cut from 700 to 300. How can this be?

I was further alarmed to find out during our Sept. 10 meeting that these cuts in user days were made by a single USFS staff person without consultation with anyone. How can the economic viability of any business be treated this way?

In the DEIS, I quote "The agency recognizes a suitable profit margin is prerequisite to maintaining a high quality operation ... ". Again sounds good but in reality is just not so. In the case of the U-Bar, as we have suffered cut backs in user days nobody from the USFS has ever asked us anything about the financial impact of such cut backs? 46d

I ... it may be hard for you to realize based on the comments that I have made that I [illegible] look at this document in a positive way. At our meeting I learned of your concept of a management document that would protect outfitters/guides from arbitrary decision in the future. However, I do not believe this document or any other document will ever protect us from such possibilities. 46e

[illegible] the U-Bar, I am unable to support alternatives I-IV because they [illegible] drainage into Class III. In describing Class III, I quote from [illegible] "there is less availability of commercial recreation use due to high levels of [illegible]". This statement eliminates any chance of us supporting any of these [illegible].

[illegible] have a very difficult time understanding why so much emphasis in the DEIS [illegible] curtailing outfitters/guides' activities. As stated earlier (based on your own [illegible]) we represent less than 7/10 of 1 percent. We provide access to citizens that otherwise may never see their land because of age, physical limitations, etc. We are the ones who clear, clean and maintain trails at no cost to the USFS and we are the ones who 46f

(46b)The alternatives do propose a service day ceiling for both stock and non-stock outfitting. However, these ceilings allow for business expansion beyond present outfitter actual use. Group sizes limits are recommended to the public and will be administered for both stock and non-stock outfitters in Class I. This is not expected to negatively affect either the outfitted or non-outfitted public.

Presently, 20-30% of the visitors to the HUW travel in groups more than 7. According to the literature (Cole, 1989), popular guide books (Davis and Veranth, 1993) and leave no trace publications (Harmon, 1994), large groups [illegible] cause more resource impacts in more pristine areas. The Class I desired condition description challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I may be adopted.

(46c)One expectation of this proposal is that a better outfitter and guide partnership can be developed to serve the users of the High Uintas Wilderness. By understanding the Outfitting Needs Analysis outfitters and the Forest Service can and will form better working relationships to manage the wilderness resource.

(46d)The economic impacts to individual outfitter/guide service providers (issue 3c) are disclosed in pages 4-16 to 4-21. Many results were derived from conversations with permittees.

(46e)The HUW Forest Plan amendment directs future management [illegible] to address common problems in a common way. The indicators and standards (pg 2-9 through 2-17) apply to both the outfitted and non-outfitted public. When and if these standards are exceeded management actions will apply to all [illegible] users.

[illegible]
Dear [illegible]

[illegible] the rules. We must or suffer the consequences of having our permits [illegible] What more incentive does one need?

For these reasons we must support Alternative V. In a less than perfect world this seems to be the lesser of the 5 evils. To do anything else would be to put the future of the [illegible] at grave doubt. In order for this alternative to work, it requires that the USFS and outfitter practice the aforementioned art of "partnership" that produces a level of service [illegible] USFS, permittee, and the citizenry.

We [illegible] at the L Bar are dedicated to providing that level of service and pledge to [illegible] with the USFS in all our efforts.

Yours truly,

[illegible]
President
ROCKY MOUNTAIN RECREATION
UTAH, INC.

(466)After reviewing comments on the DEIS, we have added Class III areas as generally appropriate for outfitted activities also. Due to existing biophysical and social conditions on the verge of exceeding standards, specific areas in Class III identified in the chart on page 2-18a will remain closed (no permit issued) to outfitting.

The alternatives propose a service day ceiling for both stock and non-stock outfitting. However, these ceilings allow for business expansion beyond present outfitter actual use. Group size limits are strongly recommended for the general public and will be administered for both stock and non-stock outfitters in Class I. This is not expected to negatively affect either outfitted or non-outfitted public.

All outfitter/guides can and many are developing career working relationships with the Forest Service and are of great benefit in helping provide recreation opportunities, maintain trails, teach wilderness ethics and leave no trace camping techniques.

(469)Support for Alternative 5 is acknowledged.

[illegible] October [illegible]

Bert Kuzoza
Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal, Utah 84078

Dear Mr. Kuzoza

Thank you for the opportunity to comment about the *Draft Environmental Impact Statement [illegible] Management of the High Uintas Wilderness*. I was pleased with the clarity of the [illegible] and found well thought out solutions to my questions at the openhouse I attended.

[illegible] in favor of Alternative 1. I have backpacked and horsepacked several times in the [illegible] area and find I am comfortable with this compromise alternative as a guideline for [illegible] the opportunity for having a good wilderness experience in the high Uinta mountains. 47a

My only real concern is still the method of regulation for those of us who are not likely to [illegible] associate with a outfitting service. I find the suggestion of making parking less available, [illegible] limiting access from the trailhead unacceptable unless the public can gain access to the conditions without making a reconnaissance trip. If access is to be made difficult, discouraged, or [illegible] from a trailhead I would prefer to have that knowledge before the trip is started so another starting point could to considered, or at least contingency plans could be made. 47b

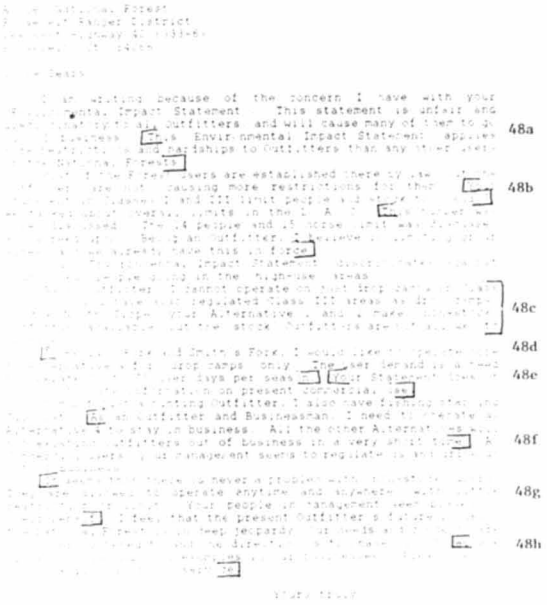
Thank you for your efforts to maintain the High Uintas Wilderness as an area where a true wilderness experience can be had both now and in the future.

Very truly yours,

David G. Drap[illegible]
281 East 400 South
American Fork, Utah [illegible]

(47a)Preference for Alternative 1 is noted.

(47b)Your concerns are noted. If/when further management actions are taken to limit visitation to the HUW (especially any type permit system) further public involvement will be solicited in the project level NEPA decision.



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(48a) This EIS addresses management direction for a unique and irreplaceable resource, the HUW. As such, careful management is required. When management actions are needed to protect the wilderness for future generations, both the outfitted and general public will need to comply.

(48b)You are right, this is the present groups size standard and closure order, however, at present between 90% and 98% of wilderness visitors travel in group sizes of 10 or less. The desired condition description for Class I has been amended to delete the restriction of 7 people and 7 stock for overnight use, because these numbers may or may not meet the intent of the Class to "manage the area for very low use". The desired condition description challenges groups who visit Class I areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted.

(48c)In order to maintain and enhance most pristine conditions, Class I will continue to allow drop camps only for the outfitted public using stock. However, since the outfitting and guiding criteria on page 2-2 and 2-3 directs guides to set excellent examples of wilderness behavior, the outfitted public will generally be permitted to utilize Class III (with some exceptions) as noted in Desired Condition description on page xx of the FEIS. Permits have not been issued for specific drainages on the North Slope for at least 10 years. Use in these areas by the general public is heavy. To encourage more use, even a small amount, threatens the desired condition for these drainages.

Non-stock outfitted public use (backpacking) currently meets and in some cases exceeds the O/G criteria mentioned above. This type use causes less physical and social impact than stock use (McClaren, Cole)(Packstock in Wilderness GTR INT-301 1993]. We are comfortable in continuing to permit this type use on the North Slope. They will however be discouraged (like the general public) from staying overnight in Class I with large groups.

(48d)Permits have not been issued for Henrys Fork or Smiths Fork for at least 10 years. Use in Henrys Fork and Smiths Fork by the "non-outfitted" public is heavy. To encourage more use, even a small amount, threatens the desired condition for these drainages.

We are aware that some aspects of the direction for outfitting and guiding proposed in this analysis seem conflicting. On the one hand we determine a need for outfitting services, and on the other hand, we do allow outfitting in certain drainages. In those restricted drainages, the most obvious impacts to wilderness quality is a threat to solitude. Even when visitors practice excellent leave no trace techniques, there are few management options when the number of visitors is high. From that perspective, managers have decided to begin mitigation of the problem by not allowing outfitting and guiding operations in some areas.

(48e)Records are incomplete, but the following numbers reflect available data

in historical files for actual use of outfitters and guides on the south slope of the High Uintas since 1980

1980-81 2-00-700 service days/yr
1982-85 25-75 service days/yr
1986-89 400-700 service days/yr
1990-present 1500-2100 service days/yr

The preferred alternative recognizes a managerial need for up to 4400 service days. Outfitters have and will continue to assist managers in meeting wilderness objectives as outlined in the outfitting and guiding criteria on page 2-2.

(48f) Analysis in Chapter 4 of this document does not support your claim that existing outfitters will be forced out of business. Your preference for Alternative 4 noted.

(48g) All users, including non-stock outfitter/guides, have a significant number of restrictions they must adhere to. Most non-stock outfitting programs successfully aid managers in meeting wilderness management objectives (education, trail maintenance, etc.). Non-stock outfitters are less impacting to others and the resources than stock outfitters and therefore tend to be more appropriate use in many areas for the comparable return.

(48h) The decisions made in this document pertaining to outfitter/guide permits are: number of permits to issue, number of service days to provide, and the locations of use. The total number of permits is expected to remain about the same.

The preferred alternative recognizes a managerial need for up to 4400 service days. Outfitters have and will continue to assist managers in meeting wilderness objectives as outlined in the outfitting and guiding criteria on page 2-2.

People for the West!

Fighting for America's Communities

UINTAH BASIN CHAPTER
P.O. BOX 701
VERNAL, UT 84078

US. DEPARTMENT OF AGRICULTURE
U.S. FOREST SERVICE
INTERMOUNTAIN REGION
324 25th. STREET
OGDEN, UT 84401
MR. DALE BOSWORTH

Subject: High Uintah's Wilderness Area Draft E.I.S.

Dear Sir:

The Uintah Basin Chapter of the People for the West are concerned that the draft E.I.S. erroneously singles out and limits the activities of Commercial Horse Pack Trip Operators. 49a

The Commercial Operator constitutes a small percentage of the overall horse use of the Wilderness Area, and their activities are already regulated to prevent harm to the resource.

We feel that the existing Management Plan, when properly enforced, is sufficient to protect Wilderness Resource Values. 49b

We therefore encourage the selection of Alternative Five (No Action) in the final decision document.

Sincerely,

Dale Rasmussen
President
Uintah Basin Chapter
People for the West

The National Coalition for Public Lands and Natural Resources

(49a)After reviewing comments on the DEIS, we have added Class III areas as generally appropriate for outfitted activities also. Due to existing high use and social conditions on the verge of exceeding standards, specific areas in Class III identified in the chart on page 2-10) will remain closed (no permits issued) to outfitting.

The alternatives propose a service day ceiling for both stock and non stock outfitting. However, these ceilings allow for business expansion beyond present outfitter actual use. Group size limits are strongly recommended for the general public and will be administered for both stock and non stock outfitters in Class I. This is not expected to negatively effect either the outfitted or non outfitted public.

All outfitter/guides can and many are developing closer working relationship with the Forest Service and are of great benefit in helping provide recreation opportunities, maintain trails, teach wilderness ethics and proper minimal impact camping techniques.

Since a special use permit is issued by the Forest Service, the public expects the Forest Service to provide quality service through the outfitters are permitted to operate. Analyzing, advertising, selecting, and issuing a permit is expensive. Administering a post operation is more expensive than a pre-use operation. We set high standards to ensure the wilderness is being treated with due respect so tax dollars are not being wasted.

(49b)Support for Alternative 5 was acknowledged.

To the U.S. Forest Service, To whom it may concern,

I appreciate the opportunity to comment on the proposed plan for managing the *High Uintas*.

I support the plan you proposed because it addresses the need to protect the monument and still allows reasonable access to the area for the users. 50a

(50a)Preference for Alternative I noted

Thanks for all the hard work and time you each invest in caring for our forests. Hang in there and keep up the great work.

Sincerely,
Troy L. Hone

UTAH

DUCHESNE COUNTY

October 16, 1996
Duchesne County Commission
P.O. Box 270
Duchesne, Utah 84021

U.S. Forest Service
Joseph Bodrovski, District Ranger
P.O. Box 981
Duchesne, Utah 84021

Dear Mr. Bodrovski:

Please accept Duchesne County's comments on the Draft Environmental Impact Statement (DEIS) for the High Uintas Wilderness Area. This matter was discussed as an agenda item at the October 2, 1996 Planning and Zoning Commission meeting, and the Planning Commission passed its recommendations on to the Duchesne County Commission. The Commission discussed the DEIS as an agenda item on October 8, 1996 and submits the following comments for your consideration.

First, and most important, Duchesne County feels very strongly that its residents are informed and involved in the planning process. As you know, the Forest Service is required to coordinate its land use activities with the land use activities of local governments. National Forest Management Act, 16 U.S.C. 1604(a), 16 CFR 219.2(b)(a). In addition, the Forest Service must provide for public participation in the development, review, and revision of land management plans including, but not limited to, making the plans or revisions available to the public at convenient locations in the vicinity of the area affected. Finally, the Forest Service must review the land use plans and policies of Duchesne County and, if there are conflicts between the Forest Service and local governments, the review must consider alternatives for resolution. 16 CFR 219.7(c)(4).

In examining the "proposed action" by the Forest Service in the DEIS, it is clear that Alternative #1 is in conflict with the Duchesne County General Plan. Duchesne County believes that public lands administered by the Forest Service should be managed under a "multiple-use" concept to maximize economic development opportunities. The County defines multiple use as "including but not limited to, the following historically and traditionally practiced consumptive and non-consumptive uses: grazing, recreation, timber, mining, oil & gas development, agriculture activities, and water resource use and development. true multiple use management allows the standard resources to be used for multiple use simultaneously. Consequently, the County is concerned about the designation and management of wilderness areas within its boundaries to the extent these designations and their accompanying use restrictions are inconsistent with County interests and economic development objectives. 51a

(51a)The Utah Wilderness Act of 1984, the Wilderness Act of 1964, Department of Agriculture Regulations, and Forest Service policy describe and direct the framework for managing uses of wilderness areas administered by the Forest Service (pages 1-3 to 1-5). The Forest Service does not have the discretion to violate Federal law, regulation and policy even if incompatible with county goals. Forest Service wilderness management policy states in part "Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness" (FSM 2320).

That being said, Duchesne County opposes the "proposed action", Alternative #1 as the preferred alternative because it increases resource protection resulting in more restrictions while minimizing multiple use management. In short, this alternative is simply too restrictive and, therefore is incompatible with the Duchesne County General Plan in that it eliminates traditional use of the designation. For example, in Alternative #1, 23% of the wilderness is in Class 1, which is characterized as having the least amount of human influence within the context of wilderness. In this area, lakes are generally not stocked with fish and overnight group size is no more than seven people and seven stock and commercial use is limited. Under this Alternative, the Boy Scouts of America would be denied reasonable access to Grandaddy Lake - a long-standing and traditional outing. Further, the proposed action discriminates against other classes of individuals, i.e. the handicapped and the elderly because there are fewer, if any trails in this alternative. In this regard, the proposed action gives paramount consideration to values other than those more directly related to human uses at the expense of the multiple use management concept. While the Forest Service may perceive a "need to articulate a shift in national policy" for wilderness management in the High Uintas, Duchesne County should not provide the means to fulfill that objective.

In conclusion, Duchesne County favors as a preferred Alternative #2, because it is the alternative with the least restrictive highest human use potential and thus, more compatible with the Duchesne County General Plan. The Duchesne County Plan supports the following specific activities within wilderness areas: maintaining/permitting existing and potential timber, mining, grazing practices, and opportunities, permitting motorized wildlife management activities, e.g., fishery stocking and species transplants; accepting exotic species as part of the area's fauna; maintaining "reasonable" use regulations and restrictions concerning campsite location(s) and use (human and animal) numbers; and maintaining access to water resource capital improvements allowing adequate maintenance of dams, operation, diversion, and monitoring facilities. To the extent the proposed action impacts these specific activities, it is in conflict with the Duchesne County General Plan and unacceptable. Accordingly, Duchesne County requests that the Forest Service review the Duchesne County General Plan and propose alternatives for resolution of these conflicts.

Sincerely,

Duchesne County Commission

SD:ym

51b

(51b)Support for Alternative 2 noted

(51c)Wilderness is managed under the idea of multiple use as part of the larger view of multiple use of all National Forest System lands. Wilderness, the designation, is managed for a more narrow range of multiple uses with intrinsic values and primitive recreation being the primary focus. Part of the use and enjoyment of wilderness is served through the public use of outfitter/guides.

(51d)This not has translated into service days available by drainage. In light of the O/G Needs assessment, it is necessary and appropriate to set a service day ceiling on outfitted services.

(51e)At present between 90% and 98% of wilderness visitors travel in group sizes of 10 or less. And registration information suggests that between 10-20% of the visitors to the HUW use stock and 5-20% of those are using more than 7 head of stock.

In order to maintain the integrity of the HUW for future generations of Duchesne County residents, some carefully considered restrictions in behavior and uses are appropriate.

According to the literature (Cole, 1990), popular guide books (Davis and Vergath, 1994) and Leave No Trace publications (Harmon, 1994), in more popular areas large groups can cause greater resource impacts. The Class I desired condition description challenges groups who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-15). If and when (through monitoring) this standard is exceeded, management actions to restrict group size in Class I will be adopted.

Both stock and non-stock users who choose to travel in Class I accept the responsibility to travel lightly and in small groups.

(51f)Your concern is noted. If/when further management actions are taken to limit visitation to the HUW (especially any type permit system) further public involvement will be solicited in the project level NEPA decision.

(51g)Restrictions vary little between alternatives; the primary purpose of establishing classes is to assist management in monitoring and allocation of resources.

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United States Department of Agriculture | Forest Service | Ashley National Forest
Roosevelt Ranger District
244 West Hwy 40, (333-6)
Roosevelt, Utah 84066

File Code: 2320/planning

Date: Nov 12, 1996

Dear Commissioners

We enjoyed meeting with you and the planning commission on November 15 to discuss your concerns about the High Uintas Wilderness Management Plan EIS. We hope the following statements reflect those concerns accurately.

1. Within the realm of wilderness law, Duchesne County desires the concept of multiple use be [illegible] in regards to recreation and outfitting opportunities. 51c

2. Outfitters and Guides should be not be restricted from offering services and in the wilderness [illegible] should not be imposed on the outfitters if they are not also imposed on the general public. 51d

3. Duchesne County feels the proposed group size limit of 7 people and 7 stock in Class I is arbitrary and does not meet the needs of traditional users of the wilderness, ie. boy scouts (not enough leaders to meet BSOA standards of two leaders per group), and LDS church functions. 51e

4. Duchesne County believes residents of the county must maintain the ability to experience these mountains and do not feel restriction on use is appropriate. 51f

5. Duchesne County prefers alternative #2 over Alternative #1 because there are less Class I areas (therefore less potential restriction). 51g

6. Duchesne County feels that DWR should maintain complete control over fish and wildlife management. 51h

7. Duchesne County constituents like to fish in the high lakes and want a recreational fishery maintained by DWR to meet that expectation. 51i

8. Duchesne County wants to be at the table for discussions on the fisher management MOU. 51j

9. Duchesne County wants to [illegible] water rights, and dam stabilization language as defined [illegible] UBRP [illegible] 51k

10. Duchesne County does not endorse Alt 5 because they see the benefit of the [illegible] Class designations to manage the HUW. 51l

If the above [illegible] the Duchesne County concerns they will be entered in the record for consideration and [illegible] make changes to the DEIS. Please contact me or Gayne Sears (at 722-5018) if you see a need for changes to these comments.

Caring for the Land and Serving People

(51h)The Wilderness Act of 1964, states that, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests." The DWR will maintain control over fish and wildlife management. The Forest Service will work with the DWR in preparing a memorandum of understanding which [illegible]ifies agreed to roles and responsibilities in regards to fish stocking [illegible] regulations will continue to be controlled by the State, who will consider recommendations from the Forest Service and other interested publics.

(51i)Comments from the public and discussions at ID team meetings prompted fish stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4.

The Wilderness Acts clearly support primitive or unconfined recreation opportunities in the HUW. The direction in this document meets that intent.

(51j)Duchesne County and all counties affected are invited to voice their specific concerns to UDWR and the Forest Service.

(51k)The irrigation reservoirs in the wilderness that were under permit at the time the Utah Wilderness Act was passed are legal, and can be used for their established purpose as long as the need exists. The act also allows for their maintenance, using motorized or mechanical means, if it is determined through analysis that these are the minimum tools needed to do the work. The Forest Service retains the decision authority on when and under what circumstances motorized or mechanical tools may be used.

The Uinta Basin Replacement Project (UBRP) portion of the Central Utah Completion Act has, as part of its mandate, to stabilize reservoirs in the wilderness if facilities are built which will allow transfer of water storage rights. The Draft Environmental Impact Statements for the Uintah and Upalco units of the UBRP project propose the construction of reservoirs which will allow the transfer of storage rights, and propose the stabilization of all special use reservoirs in Yellowstone, Swift Creek, and Uinta Canyons.

These reservoirs will be stabilized at a level that more naturally reflects the preconstruction conditions, and allow natural streamflow processes to re-occur. The reservoirs must be stabilized at a level that poses no hazard, requires no maintenance or inspection, and requires no permit. The actual level of the lake that will meet these conditions will vary by site. Some lakes may be slightly larger or smaller that the original conditions, depending on what must be done at each site to meet the no hazard criteria.

(51l)Your comment is noted.

Oct. 14, 1996

Ashley Forest Supervisor
355 East Vernal Ave
Vernal, UT 84078

Forest Supervisor,

The following are brief comments on the High Uintas Wilderness Management proposal. In the past, I've submitted detailed comments. I am very familiar with the area and issues involved.

My only comment is this: Obey the spirit of wilderness as codified in the Wilderness Act & other legislation. It is sad but the Forest Service is hell-bent on a status-quo course that will destroy the wilderness. 52a

Please note my new address and send me a copy of the decision as soon as it is signed.

Sincerely,

Gary Macfarlane
PO Box 314
Corvallis, MT 59828

(52a)We disagree that this is a status-quo proposal or that it will destroy the wilderness. The very reason for initiating this effort is to establish acceptable indicators and standards that insure the wilderness resource is protected in the spirit of the Wilderness Act. The proposed action is not the no action or status quo alternative

July 14, 1994

Clark Tucker
District Ranger
244 West Hwy 40 (333-6)
Roosevelt, UT 84066

Dear Clark

Here are my comments on the LAC scoping document. As you know, I have just moved so please excuse any delay in sending these comments to you.

First, there are significant flaws with the LAC scoping document. While I don't fault the desire and effort by Forest Service people — a very conscientious effort — the results of LAC to date, are poor

I've already written two letters about what I should be included in the record for this EA. *I believe LAC should be scrapped and the information it generated used in another plan.

I suggest a much simpler wilderness management plan. The proposal I make is contained in the following guidelines.

-*Have a permit system, even if it is simply a self-registration permit at the trailhead. This

would provide valuable information 52b

* Require pre-registration for all commercial and organized groups. Outfitters already comply with this through their permits. All scout groups, hiking groups and others organized groups must obtain a permit in advance. This would provide the Forest Service the opportunity to educate the group about "Leave No Trace" prior to the trip. 52c

* Require pre-registration and limit permits in areas that exceed use limits (the first year such a program is implemented would be to establish how many people visit an area. The following years would be used to more carefully manage use.) Here are my recommendations: 52d

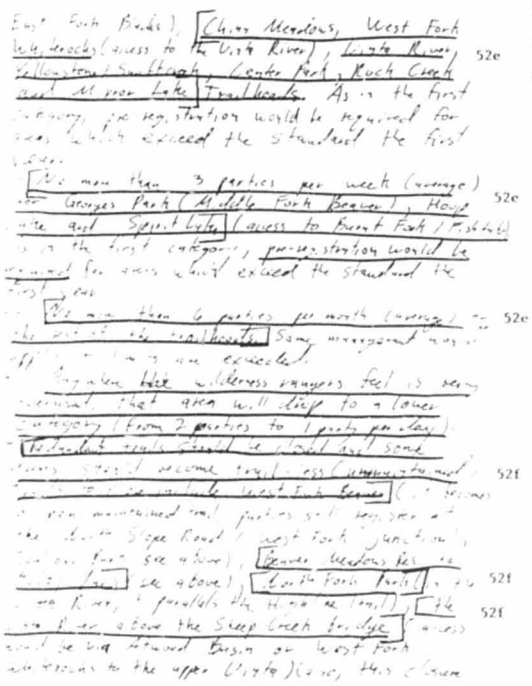
- No more than 2 parties per day (average) entering the Highline, Grandview, Moon Lake, Henrys Fork, Stillwater and East Fork Bear Trails. If average use (July 1 - Sept. 7) exceeds 2 parties per day, then pre-registration is required the next year for that area (the rivers) 52e
- No more than [redacted] per day (average) entering the West Fork Blacks, East Fork Blacks, East Fork/Bear River access to the East Fork Smiths (note: most people would access this area at the East Fork Blacks Trailhead and would be included in that group. However, some may choose to ford the

(52b)Permit systems have an added cost to administer and to enforce. Voluntary permits are issued at the Mirror Lake trailheads affecting the popular Naturalist Basin. Registration boxes are being added to all trailheads on the south side and will serve as a type of registration and information gathering tool. No plans exist at this time to institute a wilderness wide permit.

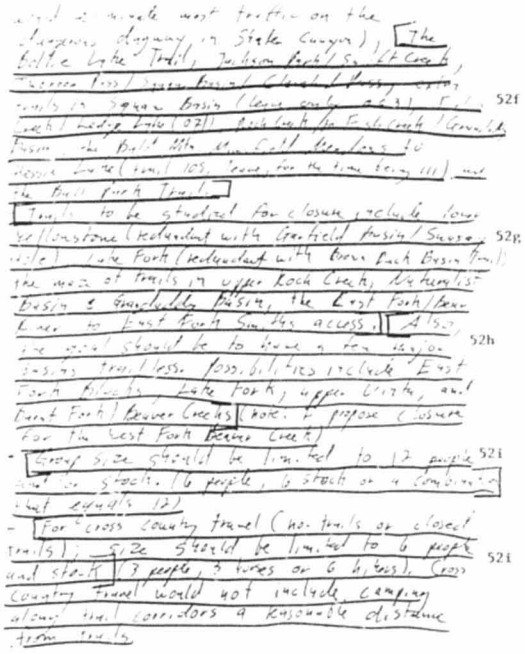
(52c)All commercial groups are under special use permit. This provides managers with an excellent opportunity to educate about Leave No Trace. All scouting groups are permitted through their respective councils. No policy exist at this time to require groups like the Boy Scouts to apply for special use permits. A policy to require all non profit groups to apply for a permit is a viable management action and may be considered in the future.

(52d)Management actions run along a continuum from the benign, i.e. a sign, to law enforcement actions. This allows managers to use the "minimum tool" concept in choosing a course of action to address impacts. Voluntary permits are issued at the Mirror Lake trailheads and affect visitors to the popular Naturalist Basin. Registration boxes are being added to all trailheads on the south side and will serve as an information gathering tool. No plans exist at this time to institute a wilderness wide permit or designated campsite system. However, designated campsites at Grandaddy Lake are under consideration to allow badly damaged areas near the lake shore to be revegetated.

(52e)This document sets programatic direction rather than specific management actions that you suggest.



152f & g/We agree, in some basins there are duplicative trails that will be considered for closure and rehabilitation. However most of the major access trails to each drainage are not considered duplicative. They may end up at the same destination (Swasey Hole trail and Five Point Lake trail both end at Five Point Lake), but they provide access to different wilderness opportunities along the way. Many of the trails listed are traditional routes and serve the purpose of providing solitude. These will be maintained.



52f

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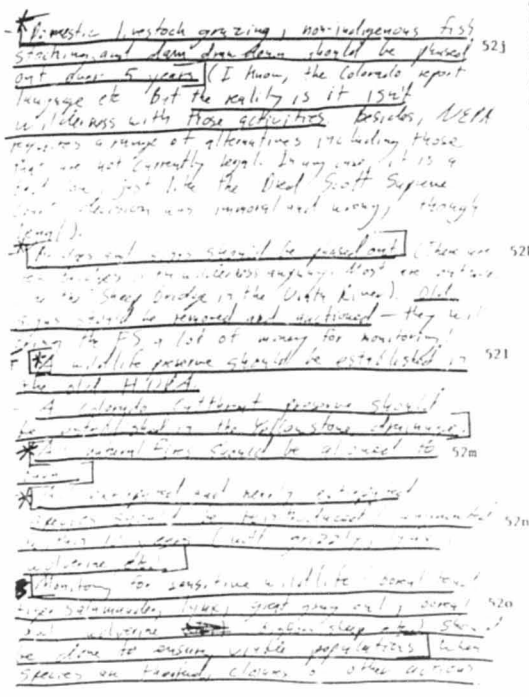
52h)Some of these trails are the major access routes to key areas and are the only trails within a drainage such as the East Fork Blacks Fork, Burnt Fork, West and Middle Beaver, and Bear er Meadows Trails. It is our opinion that these kind of trails could not be closed because of the number of users traveling through these areas. Visitors going up through a drainage to reach the high ground would naturally use the streams as a guide. It wouldn't take a large number of visitors to create a trail in the wrong place through sensitive habitat.

52i)Standards for group size will remain as stated on pg 2-14



(52j)Phasing out grazing in wilderness is in direct conflict with Congressional Grazing Guidelines which state "there shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly 'phase out' grazing". The Congressional Grazing Guidelines clearly place this comment beyond the scope of the EIS. Fish stocking is addressed elsewhere in this document. Draw-down of reservoirs is a function of water rights laws which are clearly beyond the scope of this document.

(52k)Structures such as bridges and junction signs are needed to provide a level of protection to the wilderness resource.

(52l)The creation of wildlife and fish preserves would be a cooperative effort between the Forest Service and the State and may be considered in the future. It would be a complex task with agreements, implementation and enforcement which will not be undertaken at this time.

(52m)This Forest Plan amendment initiates a process to monitor natural fires and allow them to burn while in prescription. These are termed prescribed natural fires. In order to re-introduce natural fire, we hope this new direction leads the High Uintas Wilderness into a successful prescribed natural fire program.

(52n)Reintroductions and supplemental transplants are a function of the Utah Division of Wildlife Resources. The Forest Service is supportive of these activities and continues to work with the Division in determining the feasibility, time frames, and the level of environmental documentation which is needed as the Division proposes these transplants.

(52o)We will continue requesting funding to map and monitor habitat needs for all sensitive species identified in the Biological Evaluation and other individual species as they are identified in the area.

taken

*Existing dams (reservoired lakes) should be rehabilitated/restored within 10 years to natural levels. 52p

*No reserved camp sites should be established for anyone. 52q

The rest of my comments are directed toward the scoping document.

J This plan must be site-specific. Otherwise, it has no value. A The Forest Service needs to address the issue of AMPs since the proposed regulations would eliminate AMPs (see grazing reform proposals by USDA & USDI). E Fish stocking is an issue (as is grazing) and must be addressed.

Rare species and indicators (amphibians, mollusks, cavity nesters, lynx, marten, fisher, wolverine) need to be addressed.

The maps are biased against wilderness, and they are inaccurate. There is far more class I (unroaded land) than indicated in any alternative.

The Uintas are a gem that have been treated like a [illegible]. That must change. I commend the people in the Forest Service who are trying to overcome institutional and bureaucratic hurdles

(52p)The irrigation reservoirs in the wilderness that were under permit at the time the Utah Wilderness Act was passed are legal, and can be used for their established purpose as long as the need exists. The act also allows for their maintenance, using motorized or mechanical means, if it is determined through analysis that these are the minimum tools needed to do the work. The Forest Service retains the decision authority on when and under what circumstances motorized or mechanical tools may be used.

The Uinta Basin Replacement Project (UBRP) portion of the Central Utah Completion Act has, as part of its mandate, to stabilize reservoirs in the wilderness if facilities are built which will allow transfer of water storage rights. The Draft Environmental Impact Statements for the Uintah and Upalco units of the UBRP project propose the construction of reservoirs which will allow the transfer of storage rights, and propose the stabilization of all special use reservoirs in Yellowstone, Swift Creek, and Uinta Canyons.

These reservoirs will be stabilized at a level that more naturally reflects the preconstruction conditions, and allow natural streamflow processes to re-occur. The reservoirs must be stabilized at a level that poses no hazard, requires no maintenance or inspection, and requires no permit. The actual level of the lake that will meet these conditions will vary by site. Some lakes may be slightly larger or smaller that the original conditions, depending on what must be done at each site to meet the no hazard criteria.

(52q)In administering outfitting ang guiding permits, managers have and will continue to assign seasonal campsites to outfitters on a case by case basis. Criteria for assigning these sites (can be found on page 2-17.

that are designed to keep the status quo. The status quo is wrong as well as failing to meet the mandates of the Wilderness Act. The U.W.A. are more than a playground. 52r

Sincerely,

Gary Macfarlane

Gary Macfarlane
NW 1127 Ritchie Street
Pullman, WA 99163

(52r)We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

Realizing many of the activities visitors participate in are not wilderness dependent activities, it is our policy to try and steer them to non-wilderness areas. Increased user education coupled with wilderness education for employees are examples of management approaches employed by the Forest Service to mitigate conflicts between user expectations and wilderness values

1785 East 800 No.
Price, Utah 84501

October 14, 1996

Brett Baldwin
Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal, UT 84078

Dear Brett et al.

I was pleased to see the long awaited draft EIS on the High Uinta Wilderness Plan come out. There are some positive changes from some of the earlier scoping documents.

I'm concerned that the IDT Team, perhaps by misdirection, got so far into the tunnel that it appears you can't find away around the sub-classifications of wilderness through use of a recreational opportunity spectrum. One of the only logical comment that has been attributed to Barbara Streisand is when she said "Some French clothes designer makes a mistake, and millions of American women flash to pay for it." Your insistence in hanging on to the Recreational spectrum for alternative development for a Wilderness Resource is a similar mistake. The recreation resource is just one component of the wilderness resource. Again, as I did in a scoping letter, I suggest that you probably have a basis for only two classifications within the wilderness, 1. those areas outside the limits of acceptable change (including the man made improvements) and 2. those areas within the acceptable limits of change.

My concern is that you've taken a recreation concept and divided it into classes and then developed "standards" on a basis of ecosystem components and applied them back to the recreational classification. For example, the idea that a Condition Class I area is outside of a permitted livestock allotment is a bias that can't be substantiated on an ecological or an acreage basis except for localized areas. Likewise the entire "Desired Condition Classes" are couched around the degree of human use and not on the overall Wilderness Resource per se.

For the most part, the Desired Conditions Wilderness Wide as specified on page S-11 appear as good objectives and a direction to shoot for, but then when applied to the artificial classification system, they lose substances.

As an old Forest Wilderness Manager, I haven't captured the vision from this document as to how this all ties together as a Wilderness Management Plan and as a supplement to the respective Forest Plans. I can speculate that the Desired Conditions of the Wilderness, and the Desired Conditions of the various classes will be combined with the Indicators and Standards which include Monitoring and perhaps this with some description of the area will constitute a plan. Is that all there is? If it is, I would think it would be darn hard for a Manager to pick out

(53a)The use of desired condition classes is applied to this plan as a means to allocate resources by acknowledging diversity in use patterns and user behavior. Establishing varying classes in the wilderness, allows management to use different strategies for different sections of the wilderness. The kind and intensity of management can be varied based on the desired condition sought. Without using classes to allocate management resources and efforts, there is an inherent danger that the entire wilderness may degenerate to some minimum standard due to an unfocused management approach. Defining these classes provides managers with a tool to enhance the protection of wilderness.

(53b)A detailed analysis wherein actual acres inside grazing allotments that obviously fall outside a natural appearance in terms of plant species composition or other ecological measure would likely verify the first part of this comment. That acreage could be a very small percent. However, the wilderness wide Desired Conditions common to all action alternatives (page 2-3) do give direction for all areas within the wilderness regardless of livestock and recreation use. Overall wilderness resources are addressed in those Desired Conditions.

(53c)The use of desired condition classes is applied to this plan as a means to allocate resources by acknowledging diversity in use patterns and user behavior. Establishing varying classes in the wilderness, allows management to use different strategies for different sections of the wilderness. The kind and intensity of management can be varied based on the desired condition sought. Without using classes to allocate management resources and efforts, there is an inherent danger that the entire wilderness may degenerate to some minimum standard due to an unfocused management approach. Defining these classes provides managers with a tool to enhance the protection of wilderness.

(53d)The indicators and standards established for these classes are management tools. They are used to indicate when an area is achieving desired conditions, or whether management actions need to be implemented to mitigate or negate corrosive actions degrading wilderness character. The forest plan amendment in the Record of Decision guides managers in pursuing the desired conditions. Monitoring the standards that define the limit of acceptable change provides managers and the public with concrete evidence of progress toward desired conditions.

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the direction from the platitudes described. Where is the direction to obtain the desired condition? 53d
Does this mean that every lake or every drainage can have a can have a meteorologic devise, etc.?
Does this mean than that natural fires meeting prescribed conditions will receive suppression
action? Does it mean areas in Class III are good enough? Are there plans to add trails, abolish
trails, and maintain trails? Where are the special orders listed and should they be adjusted to meet
desired conditions? Is there an implementation schedule and where is it? I hope your finale
document will tie it all together in a clear concise document that can be understood by the public 53e
and most important those charged with the responsibility of managing the Area.

In all due respect, it appears you should reject all the alternatives described and then build
and select a new alternative patterned around the existing "No Action Alternative" that 53f
incorporates in a unified manner the respective Management Prescriptions from the two respective
Forest Plans with the described Desired Condition. You should identify the limits of acceptable
change and then show what areas are within this limit and which areas are not, and how you
are going to bring them up to the standards with exceptions noted, like the man caused reservoirs. I 53g;
would that would be simpler, better understood by the public, and easier to administer than
attempting to implement some artificial classification system. The High Uintas deserve this clear
cut more approach.

Following are some additional comments about various aspects of the draft document
which will augment my recommendation or show concerns that need further consideration.

The draft document seems to provide more emphasis on extirpated species than it does on
introduced exotic species. The discussion on extirpated species is subtly disguised, but it's obvious
there is a definite goal, if the State desires, to bring some of these species back. As it is written 53h
the public is being misled, and if it is the objective to bring back the wolf and grizzly bear, then it
needs to be laid out for public scrutiny.

Likewise, there is a real public concern on the issue of fish stocking, and the Service is
playing Pontis Pilot on this one by failing to address it through this NEPA process. This issue is
disguised under the need for a new Memorandum of Understanding between the State and the
Forest Service (pg. 1-10). The existing one has been in effect since 1978. As the issue of 53i
stocking affects the management of wilderness, there is a need to resolve it. This is the proper
vehicle for describing the standards and how the habitat will be managed and not some
MOU Agreement that does not have public scrutiny (page 1-12, last paragraph). Whereas the
Forest Service and the Division of Wildlife Resources are both abdicating their responsibility by
not getting together on this issue, the Forest Service should spare the taxpayer the expense of
another NEPA analysis, and come right out and disclose that "State fish stocking will continue as
it has for the past 40 years." If lakes in Class I areas have been stocked in the past they should
continue.

The statement in Desired Conditions on Wildlife and Fish as stated on pages S-11 and 2-3
should be corrected by adding, [*Subject to take from hunting and fishing,*] "natural processes and 53j
the forces of natural selection determine the diversity of wildlife and fish habitat and species.

(53e)The forest plan amendment in the Record of Decision guides managers in pursuing the desired conditions. Monitoring standards that define the limit of acceptable change provides managers and the public with concrete evidence of progress toward, or degredation away from, the desired conditions.

(53f)Preference for Alternative 5 noted

(53g)The use of desired condition classes is applied to the process to allocate resources by acknowledging diversity in use patterns and user behavior. Without using classes to allocate management resources and efforts there is an inherent danger that the entire wilderness may degenerate to some minimum standard due to an unfocused management approach. Defining these classes provides managers with a tool to enhance the protection of wilderness.

The indicators and standards established for these classes are management tools. They are used to indicate when an area is achieving desired conditions or whether management actions need to be implemented to mitigate or negate corrosive actions degrading wilderness character.

This document establishes programmatic limits of acceptable change for a variety of resources. At the site specific level, those that exceed the limits are targeted for management actions to restore acceptable conditions.

(53h)In any reintroduction proposal the Forest Service is directed to work with the State to ensure that stocking and introduction efforts will not compromise Federal interests, to prevent damage to resources occurring on National Forest System lands, and to determine the appropriate environmental documentation. This would include public involvement, especially in the case of species that are or could be highly controversial.

(53i)Comments from the public and discussions at ID team meetings prompted stocking to be added as Issue 12. The effects of fish stocking are discussed in Chapter 4. It is recognized that fish stocking invites excessive human use in some areas and that stocking can interfere with natural biological ecology. (Holden, et al. 1996)

Your comments and all those regarding fish stocking in the HUW will be shared with DWR as negotiations proceed on an MOU.

(53j)Since hunting and fishing are recreational opportunities, your comment has been used to amend paragraph four under social conditions Wilderness scale on pg. 2-4.

Wildlife transplants are limited to indigenous species and considered only when a vacant niche has been identified ---------- ---------- " It's obvious that hunting and fishing does take a toll in the amount and diversity of wildlife species and these activities are guaranteed in the Wilderness Act. Also in keeping with the statement, "The High Uinta Wilderness acts as a component to maintain indigenous species presently existing in the area," it should be noted that non indigenous species have been introduced specifically the exotic goats and ptarmigan. Action should be taken to control these exotics in the Wilderness. Without that you have a double standard. 53k

As this analysis got headed into the wrong funnel in the first place [i.e. recreational classification], the resulting Indicators and Standards for respective resource components and follow-up monitoring need some clarification. While monitoring is the "in" word, there needs to be some realistic rationale in designing a monitoring system that is obtainable considering stable or declining budgets. While most of the indicators and standards look good and are probably attainable in most of the respective resource components, there are some that should surely be questioned administratively as they appear as a recipe for noncompliance. For example: 1/ In the Wildlife and Fisheries area, if the "standard is an inventory to be taken," then this is probably unobtainable unless it can be obtained by other means. 2/ In the Recreation Component, many of the standards appear to be a Special Order. I have no problem with area closures for specific purposes such as those in Chain Lakes and Natural Bridge Basin, but to ask everyone to be an instant authority on what respective recreation class one is in when they are traveling throughout the Wilderness in regards to group size or number of stock is defying common sense and compliance. 53l

53m Firewood Availability (pg 5-23) in the Recreation Component, the standard is a given quantity of "tons acre availability" which is to be determined after baseline data is obtained. This runs to establishing a standard and a methodology that in all probability will never be achieved (the concept of limiting campfires because of lack of fuel wood availability may be right on, but to say that a "Standard" is an inventory to be done is unrealistic). 53n

Under the Water Quality component, under the Indicator of trail placement design, there is surprisingly very little said for a Standard on Trail Maintenance. Nor do the ID Team recognize the "absences of trail maintenance" as a public issue even though it was raised in scoping. The lack of tender-loving-care of the trail system is probably the biggest impact within the High Uintas Wilderness. With a few rare exceptions, the bulk of the trails I have traveled over the past 5-6 years, have received very little maintenance. Some are almost impassable and the absences of maintenance is causing new impacts (path or trails) as use is diverted around down trees, wet spots, lack of corduroy replacement, massive boulders and rocks blocking the trails, and canals due to the absences of water control structures. Some level of a trail maintenance standard needs to be established. I would think it's a fair assumption that the absences of trail maintenance is displacing more sod and vegetation than all the camp sites. 53o

Under the Water Quality component one indicator is coliform bacteria. By applying the 200 foot camping setback and a Special Order is not supported by the rationale as cited by Cole, 1989, and Godfrey's 1970 study (pg 4-22). In certain areas there may be a need for this standard. 53p

(53k)It is up to the State to determine if a species is indigenous to an area and in the case of the mountain goats, the State has determined that they are. Ptarmigan were released in the area in 1976, before the area was designated as wilderness. In the Biological Unit Management Plan written before the ptarmigan were released it states, "Twomey (1942) reported that ptarmigan were once common in the high Uinta Mountains with flocks of two to five birds being reported on Bald Mountain near Kamas." C. L. Hayward (1952), in Alpine Biotic Communities of the Uinta Mountains, Utah also talks about the possibilities and probabilities of ptarmigan in the Uintas. At this time and in consultation with the State, we see no need to "control" these species in the wilderness.

(53l)In order to maintain a focus on the importance of wildlife and fisheries monitoring work, the standard you identified was maintained to provide a place to start gathering the data to monitor in the future.

(53m)Because between 90% and 95% of wilderness visitors travel in group sizes of 10 or less, the vast majority of visitors will not be affected by the group size limitations.

Travel through Classes will not hinder larger groups as all system trails are defined as Class II or III. A larger group that travels through a Class I on a system trail will be discouraged form spending the night unless they break up into logistically smaller groups.

However, both stock and non stock users who choose to stay overnight in Class I accept the responsibility to investigate the areas, travel lightly and in small groups.

(53n)Again, the ID team felt this was an important resource area to watch for the signs of degradation to the wilderness. Though all the data is not collected for baseline information, some has been collected on the Kamas District and will be used to shape the indicators and standards for the rest of the wilderness.

The EIS proposes a firewood standard which recognizes the need to protect visual and tree resources while accommodating an important element in the recreational experience, the campfire experience. Utilizing a quantifiable method, campfires would be restricted and only stoves allowed when monitoring indicated a unacceptable adverse effect on visual/tree resources.

The effects of fire ring proliferation and trampling/soil compaction will be monitored through the implementation of campsite density and bare ground/soil erosion standards (pg 2-11 and 2-15). The effects of the removal of down wood for firewood are not likely to significantly affect an ecosystem's nutrient capital.

The most pronounced effect of firewood gathering is on the visual quality resource. Trees that are cut down, girdled, hacked up, carved on, and stripped of their lower branches show substantial evidence of "man's imprint" rather than having been affected "primarily by the forces of nature" (pg 2-16).

and orders but it should be for the right reason. 53p

A few final items. 1. Stock size limits should be reconsidered and raised to 20 head. The 53q
15 head limit is not adequate for mid size groups going for extended periods. It's the larger groups that need more feed and they aren't going to camp where feed is limited. Likewise, there are many vacant sheep allotments now available that could easily support increased stock numbers. The Ranger should at least have authority to authorize increased numbers in select areas where there 53r
are no conflicts. 2. You appear overly restrictive on outfitters and guides. In Alternatives I and II you are denying any stock use on Henry's Fork and Smiths Fork. The Henry's Fork closure would restrict those segments of the public from using livestock as a partial means of getting to King's 53s
Peak. Also your policy denies people desiring to go from east to west or vice versa on this east west mountain range with an outfitter. You need provisions or policies to cover the exceptions when appropriate.

As a retired Forest Officer, I do not want to seem unduly critical as I know how difficult these, however, I do see some areas that need improvement. I trust my comments can be taken in a constructive manner for the long term benefit of the High Uintas.

Sincerely,

A. Joel Frandsen

The intent of the proposed standard is to use the visual appearance of an activity area as an indicator of unacceptable negative effects on the visual/tree resource. By comparing areas that appear to have "abundant", "acceptable", and "scarce to none" campfire wood available for campfires with a method to measure the amount of down, woody debris (Brown, James K. 1974) managers can determine areas in need of local area firewood collection restrictions. The goal is to restrict fires only in the geographic areas where the collection of firewood is having an unacceptable adverse effect on the visual/tree resource.

(53o)Issue 4 does address the effects of "absences of trail maintenance" please refer to page 4-20. Per unit area, the present impacts of the trail system is greater than the camp site locations, primarily due to greater slopes and likelihood of intercepting natural drainages. We agree that less than desired trail maintenance has led to erosion. Trail maintenance and reconstruction strategies will be incorporated into the final environmental impact statement to address this problem.

(53p) In addition to water quality, other values such as shoreline vegetation need to be protected and maintained. While the coliform bacteria standard does not offer the sensitivity to other values near water bodies, the 200 foot set back is designed to prevent impact to vegetation and sedimentation. This is done to minimize the need for closing areas to use periodically.

(53q)Stock size limits of 15 were established in conjunction with the Limits of Acceptable Change process. Input was taken from many different user groups. The limit of 15 is in line with many other wilderness areas and is judged to be compatible with the size of the drainages and the availability of forage.

(53r)Issuing permits that authorized certain groups to be exempt from regulations would make it difficult to maintain consistency between ranger districts on the north and south sides. The Forest Service has a fiduciary responsibility to be fair and just in enforcing regulations. To this end, wilderness regulations should be applied uniformly within the wilderness and amongst the various users.

(53s)Permits have not been issued for Henrys Fork or Smiths Fork for more than 10 years, so this part of the proposal is not a change in management. Use in Henrys Fork and Smiths Fork by the general public is heavy. To encourage more use there by considering stock-use outfitting is undesirable from the perspective of possibly exceeding social and resource standards for the wilderness resource.

Kings Peak is accessible via the south slope using an outfitter.

(54a)Those recreation opportunities that are within the scope of the Wilderness Act will be maintained. Support for Alternative 5 acknowledged.

54a

P.O. BOX 610
MT. VIEW, WY 82939
PHONE (307) 782-3179

October 15, 1996

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 North Vernal Ave.
Vernal, UT 84078

Re: Draft Environmental Impact Statement for Management of the High Uintas Wilderness

Dear Mr. Kulesza:

[illegible] at request for our review of the DEIS for the High Uintas Wilderness Management, we prefer Alternative 5 (No Action) for [illegible] reasons:

By establishing a Condition Class system, it appears that [illegible] would be discriminated against under Condition Class I. 55a

In reviewing the issues affected by the environmental effects of each alternative, it seems few differences exist between alternatives; i.e. the threat of human overuse compromising ecosystem components is none to very low; outfitting and guiding operations would sustain minor economic impact; water quality threatened by human and animal waste is none to very low; exotic plant specie invasion is expected to be very low; habitat would not be significantly compromised except under Alternative 2; remaining issues are identically affected under all five Alternatives.

[illegible] rather than implementing a Class system, at continued [illegible] expense, we support upgrading those areas which currently do not meet wilderness standards. Prevailing USDA policy already [illegible] that Forest Service wilderness areas will be managed to protect and [illegible] the wilderness character of the land. Without resorting to [illegible] bureaucracy, the tools are actually in place to restore those [illegible] presently meeting the definition of "wilderness". 55b

After reviewing the DEIS, we find little benefit by employing the [illegible] Class system and therefore support Alternative 5 (No Action).

Sincerely,

Larry Ayres
by [illegible] Tisdell

Larry Ayres

(55a & b)The use of desired condition classes is applied to this plan as a means to allocate resources by acknowledging diversity in use patterns and user behavior. Establishing varying classes in the wilderness, allows management to use different strategies for different sections of the wilderness. The kind and intensity of management can be varied based on the desired condition sought. Without using classes to allocate management resources and efforts there is an inherent danger that the entire wilderness may degenerate to some minimum standard due to an unfocused management approach. Defining these classes provides managers with a tool to enhance the protection of wilderness

Flying J Enterprises
Lawny and Ida Jackson
Box 264 Vidor, Utah 84052
Phone 646-3208

U.S.F.S.

Attention: Joe and or Gayne

Subject Draft Management, High Uintas Wilderness

Criteria B:

As outfitters we reconize that the wilderness needs to be protected. There are areas that are high use classified. As class #3 in the draft, and they need to be managed differently then class #1 or #2. However we feel that to aliminate catered camps by outfitters would serve to add to the problem rather then to help.

As outfitters we are more aware of the need to protect the environment then the general public, and in high use areas someone will be using the camp spots. If it is an outfitter using these camp spots the outfitter will have the opportunity to pass along the no trace camping techniques that we have learned in comp with the U.S.F.S.. We have a long tern interest in preserving the wilderness knowing that we will likely be coming back periodically. We leave clean camps and clean up and pack out trash left by others. Always perserving the fire wood, grass, clean water and cleaning trails from debris when needed, making travel easy for all. 56a

By nature we steer our clients away from high use areas when everpossible. 56b

We are not aposed to the class #3 totally, but feel that to prevent outfitters frum having full use, while allowing the public to have unlimited use would be counter productive. 56c

Criteria D:

On the subject of service days. We would like to see the alotted amount of days be asigned to the permit and available to us that we may build our business to that potential. To be able to add to those days if the need and the resource of the individual area would allow in the future. If we qualify for one service day, we qualify for all service days. These days are the ones assigned to the permit. Outfitter service days should remain at the current level rather or not they are used, with the opportunity of increase where appropriate. 56d

I (Lawny) would like to thanyou both (Joe & Gayne) for the meeting that you had with us outfitters. For the information and explanation and especially the open minded attitude. Also thankyou for the extention on the permit period.

I have enjoyed working with you this year as representative of the Rock Creek Ranch and look forward to the future

Thanks Again

Lawny R. Jackson
Rock Creek Ranch

(56a)Most permitted outfitter/guides are more aware of wilderness ethics and use leave no trace camping techniques more often than the general public By developing closer working relationships with permitted outfitter/guides, we hope to have these ethics and techniques employed more unilaterally

(56b)Because guides teach leave no trace techniques and provide examples of excellent wilderness behaviors it is appropriate for them to recreate in higher use areas as well as less used areas

(56c)After reviewing comments on the EIS, we have added Class III areas as generally appropriate for outfitted activities also Due to existing high use and social conditions on the verge of exceeding standards, specific areas in Class III (identified in the chart on page 2-18) will remain closed (no permits issued) to outfitting On a broad scale, if managers ever impose a quota on the number of visitors to the HUW, both the outfitted and non outfitted public will share the encumbrance

(56d)The outfitting and guiding criteria (pg 2-2) have been revised to reflect an opportunity for service days to either increase or decrease (within the service day ceiling)

UINTAH BASIN
ASSOCIATION OF GOVERNMENTS

October 21, 1996

Mr. Bert Kulesza, Supervisor
Ashley National Forest Service
355 North Vernal Avenue
Vernal, Utah 84078

Dear Mr. Kulesza

The Uintah Basin Association of Governments (UBAOG) has been informed that Forest Service is currently working on an amendment procedure for the Ashley National Forest that includes a three year draft for Limits of Acceptable Change (LAC). We understand that the LAC includes procedures to exclude outdoor "outfitters" from High Uintah Wilderness, but allows for *other* users to visit the area. We consider this discriminatory and hope that this is not the case. If it is, we strongly encourage you to make the necessary changes to allow outfitters access to these public lands. 57a

On November 5, 1991, the Uintah County Commission adopted Ordinance No. 11-5-91:2 holding the U.S. Forest Service to the requirements in the Forest Service Planning Regulation 36 C.F.R. §§219.7 *et seq.* We encourage the Forest Service to abide by this County Ordinance and maintain a strategy consistent with federal Law. 57b

We look forward to working with you on this, or any other issue and appreciate your coordination efforts with local government in the Uintah Basin.

Sincerely,

Greg Righetti, Executive Director

cc: Mr. Dale Bosworth
Uintah County Commission

855 East 200 North (112-3) • Roosevelt, Utah 84066 • (801) 722-4518
Toll Free Uintah County 789-7270

(57a)Section 4(d)(6) of the 1964 Wilderness Act states "Commercial services may be performed within wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other purposes of the areas". From this perspective, outfitting and guiding must meet a management defined need to be considered essential and appropriate to operate in the HUW. The Outfitting Needs Analysis defines this need.

King's Peak is accessible by commercial outfitter from the south slope.

(57b)The Utah Wilderness Act of 1984, the Wilderness Act of 1964, Department of Agriculture Regulations, and Forest Service policy describe and direct the framework for managing uses of wilderness areas administered by the Forest Service (pages 1-3 to 1-5). The Forest Service does not have the discretion to violate Federal law, regulation and policy even if incompatible with county goals. Forest Service wilderness management policy states in part "Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness" (FSM 2320).

PO Box 26976
SLC, UT 84126-0976

CONTACT FORM

Date: 10/31/96

Title of Document: HUW DEIS

Name of Project Coordinator:

Name: Mike Bodenchuk

Address: USDA Animal Damage Control

Phone: 801 975-3315

Comments: wanted to make sure HUW DEIS is compatible w/ ADC EA recently signed — 58a

I sent him a copy of Summary & paragraph on predator control in EIS

Attachments Yes____ No____
How many? ____

Location: Roosevelt

Name and signature of Person Taking Comments: Cayne Se[illegible]

Signature of Person Commenting: ____

(58a)A Forest Service biologist participated on the ID team Animal Damage Control used to prepare an environmental assessment (EA) for predator control in Utah in 1996. At that time, the Forest Service determined the EA was consistent with the two Forests Plans. However, since then an inconsistency was identified. Utah ADC is aware of this. Current Forest Plan direction will be maintained.

Larson Livestock, Inc.

BOX 395 LYMAN, WYOMING 82937

October 17, 1996

Forest Supervisor
Wasatch-Cache National Forest
623b Federal Building
125 South State Street
Salt Lake City, UT 84138

via Telecopier No. 801-524-3172

ATTN: Julie Hubbard

Re: Comments - DEIS for the Management of the High Uintas Wilderness

Dear Julie:

Reference is made to our telephone conversation today during which you said that I would be able to further comment this month and these comments would be considered during your deliberations which will began in November of this year.

First of all, we are concerned that the purpose of the High Uintas Wilderness (HUW), is being changed from that which was envisioned in the Law setting up the HUW.

Second, it appears that the environmentalists (Preservationist) view of the use of the HUW has unduly influenced what is included in the draft EIS. We know, based on good authority, that the enviros were not satisfied with the provisions in the law setting up the HUW. They are now trying to use your process to change the intent of this law. Some examples are as follows:

- In your "issues" section that "were determined to be the most significant to the analysis and were used to differentiate between alternatives" you state human overuse threatens the integrity of ecosystem components such as riparian areas, wetlands, lakes, streams, topsoil, and wildlife and THREATENS POTENTIAL FOR REINTRODUCTION OF EXTIRPATED SPECIES. 59a

This is the avenue the preservationists are going to use through you in severely restricting or eliminating human use in the HUW. I oppose this and it is counter to the original intent of the Law designating the HUW.

A meeting, sponsored by the World Conservation Congress, Jay D. Hair, President, is currently being held (October 13-23, 1996 in Montreal, Canada. Following is a quote from their agenda, "This workshop series, aimed at formulating guidelines and strategies, will include such topics as how do "Biosphere reserves" and "conservation corridors" work and are they models for land management?". We oppose these concepts as they remove human beings from being able to use the lands. This is contrary to our belief of what our creator intended. Your management of the HUW is headed in this direction.

Thank you for the opportunity to comment. We will expound on these subjects.

Sincerely,

Karl A. Larson

Carl A. Larson, President

(59a)The Utah Wilderness act of 1984 directs that wilderness be administered in accordance with the provisions of the Wilderness Act of 1964 The Wilderness Act of 1964 directs the preservation of wilderness character and natural conditions where lands are affected primarily by the forces of nature The validity of this issue is based on the Act Human overuse could threaten ecosystem components The Utah Wilderness Act of 1984 states "nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the State of Utah with respect to wildlife and fish in the national forests of Utah This does not seem to indicate reintroduction of extirpated species would be inappropriate

UTAH WILDLIFE FEDERATION

POST OFFICE BOX 65636

SALT LAKE CITY, UTAH 84165

UWF/Ashley:kD

October 13, 1996

Mr. Bernie Weingardt
Forest Supervisor
Wasatch-Cache National Forest
8236 Federal Building
125 South State Street
Salt Lake City, Utah 84138

Dear Mr. Weingardt,

1. Please reference the Draft Environmental Impact Statement for the Management of the High Uintas Wilderness.

2. We realize that regardless of which Alternative is selected, the forest service track record reflects that any choice is not cast in stone forever and resulting management activities will be reassessed periodically (as your draft reflects).

3. After a thorough review of the draft and after much discussion, we support Alternative 5, No Action. Our rationale for supporting this alternative is outlined below. 60a

a. From the viewpoint of wildlife, the current plan allows the Utah Division of Wildlife Resources to manage wildlife consistent with the guidelines our board previously endorsed and reflects the goals of the Utah Wildlife Federation. 60b

b. The subdividing of the High Uintas into zones is apparently an effort to offer something to each special interest but appears to be unwieldy and difficult to enforce. 60c

c. The current Wasatch-Cache and the Ashley National Forests management plans with modifications for consistency between two forests would offer the continuation of a management approach that is pretty well understood and supported by the public. Restricting group and stock sizes pretty well fits into the being locked out fears of those opposed to wilderness. 60d

3. Accordingly, we strongly suggest the Wasatch-Cache and the Ashley National Forests work together to update both forest plans and develop consistent management strategies for managing the High Uintas Wilderness Areas.

(60a)Support for Alternative 5 acknowledged

(60b)This statement is one rational for favoring Alternative 5 No Action Alternative 1, the proposed action, and indeed, all alternatives, allow the UDWR to manage wildlife within the wilderness. This is set forth in Section 4 (d) (8), in the Wilderness Act of 1964, which states, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests."

(60c)Most Class boundaries were drawn according to topographical features, and in relation to historical recreational use areas. As a result, the Forest Service does not expect that most visitors will need to be concerned with whether they have crossed a Class boundary and must now behave differently. In addition, some suggestions have been made to adjust the public wilderness maps to display the Classes in a visitor friendly way.

In addition, designation of classes is primarily used to focus management on popular areas while allowing allocation of resources to be applied as needed to maintain or monitor less popular areas.

(60d)Most Class boundaries were drawn according to topographical features, and in relation to historical recreational use areas. As a result, the Forest Service does not expect that most visitors will need to be concerned with whether they have crossed a Class boundary and must now behave differently. In addition, some suggestions have been made to adjust the public wilderness maps to display the Classes in a visitor friendly way.

In addition, designation of classes is primarily used to focus management on popular areas while allowing allocation of resources to be applied as needed to maintain or monitor less popular areas.

(60e)Your statements are correct. There are additional requirements that must be included in the EIS that will more completely address fire management and the guidelines and structure of a wilderness fire management plan.

The Forest Service Manual lists 10 areas that must be included in a Forest Plan, or amendments to a Forest Plan, that address the Prescribed Natural Fire (PNF) Program requirements. At the present time, these requirements are not fully addressed in the Draft EIS. The first two, general description of the area, and the fire history of the area, including the role of natural fire, are both covered in the DEIS. The following additional topics will also be addressed in the Final EIS.

1. General objectives to be achieved by PNF and identification of acceptable outcomes.
2. General discussion of the required skills, qualifications and organization necessary to implement and manage the PNF program.
3. General funding requirements.
4. Interagency and intra-agency coordination.

e. Overall, we would like to see more specific direction on the following issues regardless of which alternative is chosen and implemented.

a. In the absence of natural fire, we may be on the verge of losing some of the ecological functions and processes and important plant communities that should be a focus of management in all wilderness areas, especially the High Uintas. This lack of fire has resulted in a 60 percent loss of the aspen communities in Utah over the last 100 years. However, the High Uintas plan provides very little emphasis to expansion of prescribed natural fire to ensure that ecological systems are properly functioning. This is critically important to many dependent organisms. We believe the final plan needs to place more emphasis on prescribed fire. 60e

b. The High Uintas is Utah's largest wilderness and an extremely important wilderness area. It is important that monitoring receive increased emphasis from an ecological and scientific standpoint in cooperation with the Division of Wildlife Resources. Over the western United States there has been a significant decline in populations of many amphibian species. Wilderness areas, such as the High Uintas, need to serve as ecological benchmarks. We would like to see more emphasis on monitoring and the use of the High Uintas as an ecological benchmark to gain better insight as to long term environmental changes. We suggest that there has been much speculation as to the negative effects of fish stocking in the High Uintas lakes. We would like to see more cooperative monitoring to better understand the effects of fish stocking on native fauna. 60f 60g

c. There seems to be too much emphasis on fish stocking when this is an activity that primarily rests with the State of Utah. If areas are going to be set aside for no fish stocking then we would hope that the Division of Wildlife Resources concurs with that determination. Otherwise, they are being put into a corner which can create conflicts and false public expectations. 60h

d. We recognize that grazing of livestock will continue and that is not part of the decisions to be made, however, we would like to see increased emphasis to take care of some of the grazing problems that currently exist. 60i

e. We would also like to see increased emphasis on restoration of indigenous species such as the Colorado cutthroat and Rocky Mountain bighorn sheep. We question, how will the forest service manage habitat and other cooperative efforts with the Division of Wildlife Resources to restore and maintain viable populations of these species in the High Uintas. 60j

Thank you for the opportunity to comment on this important public lands management proposal. We request that we be provided a copy of the responses to the EIS and that we be kept informed on the progress of this EIS.

Sincerely,

Gerald E. Gordon
Public Lands Issues Coordinator

5. General discussion of "inform and involve actions to include both internal and external audiences.
6. Risk involved and potential impacts of plan implementation, including the trade-off between smoke emissions from prescribed natural fire and the ecological need to burn.
7. Identification of fuel treatment measures needed to reduce hazard fuels in support of the PNF program, including identification of areas or developments that need protection from fire.
8. Identification of the appropriate level of monitoring and evaluation needed for the PNF program.

(60f)Monitoring in the High Uintas Wilderness has been an ongoing process in the past several decades. Monitoring includes vegetation condition and trend, air quality, and water quality. Acid rain studies are also conducted in the Uinta Mountains, but due to logistic problems created by wilderness designation, these studies are difficult to monitor on a regular basis. A much expanded monitoring program (more emphasis) could be very useful for basing management in the future. Trend of Forest Service budgets indicate little opportunity for greatly expanded monitoring programs.

(60g)This is also a desire of the Forest Service and one that should be addressed in the memorandum of understanding that the Forest Service and UDWR will develop.

(60h)This issue will be a major point in the memorandum of understanding that the Forest Service and UDWR will develop.

(60i)Decisions on how grazing allotments will be managed will be made through Allotment Management Planning in adherence to the Congressional Grazing Guidelines that apply to wilderness.

(60j)While the plan does not increase emphasis on restoration of indigenous species, it does state we encourage this (pg 2-3) when opportunities arise.

There is a high level of interest in Colorado cutthroat trout in the Utah Division of Wildlife Resources and Forest Service. The Division of Wildlife Resources is actively surveying waters for this fish, and they have found it in several streams in the Northeastern Region of Utah. Sheep Creek Lake is being managed for the production of this species of fish from which introductions to other waters in the Uinta Mountains can be made.

At least 3 reintroductions of Rocky Mountain bighorn sheep have been made in the Uinta Mountains in the past 15 years or so.

North Eastern Utah

Outfitters, Packers & Guides Association

Received Ashley National Forest

Ashley and Wasatch-Cache Forest Supervisors October 12, 1996
Bert Kulesza and Bernie Weingardt

Dear Mr. Kulesza and Mr. Weingardt:

The draft E.I.S. for future wilderness management was intended to be formulated through the L.A.C. process, which would be a round table compromise of ideas and expectations from various user groups.

As president of this organization, I was notified and asked to be a member of the L.A.C. group. Since I did not conduct business in the wilderness area, I contacted two Outfitters who represented the guides. They drove hundreds of miles from as far as Fort Bridger, Wyoming to attend the meetings and spent countless hours helping to formulate a plan for future wilderness management.

It is unfortunate that we were led to believe we were represented in the L.A.C. Process. This final draft E.I.S. has been prepared with a total disregard for the Outfitter-Guide Permittees. The first four alternatives are none submitted by the Outfitters and we have been told by Gayne Sears that their maps and alternatives are the only ones that were not used in the final draft. Why then were we told that this would be a compromise of all user groups.

There are many contradictions to this draft and this is the first one:

The Forest Service Manual describes an Outfitter as being needed by the Forest Service to assist in managing and protecting the wilderness resource and provide for the well-being of visitors to the wilderness.

This draft E.I.S. lists four alternatives which will limit or exclude Outfitter-Guide business which use horses and mules. These are businesses that could be a great working partnership with the Forest Service. 61a

Over 70% of pack trip clients are over 60 years of age and have some kind of physical disability. An Outfitter is the only means of conveyance for this user group. 61b

Forest Law Enforcement statistics reveal that rogue or illegal Outfitters outnu ber lega' permittees 3-1. If you take the legal Outfitters out of the wilderness, there will not be a reduction in commercial guided trips, only legally guided ones. 61c

Outfitters are only as successful as those lands that they represent to their customers. Taking care of the resources and educating the public on ethical wilderness use is standard practice. The Outfitter is one of the best tools the Forest has. You might need to sharpen it up (help educate new owners), but it will always serve you in capacities beyond your internal means. 61d

P.O. Box 129 • Whiterocks, Utah 84085 • (801) 353-4049

(61a) The alternatives propose a service day ceiling for both stock and non-stock outfitting. However, these ceilings allow for business expansion beyond present outfitter actual use. Group size limits are strongly recommended for the general public and will be administered for both stock and non-stock outfitters in Class I. This is not expected to negatively effect either the outfitted or non-outfitted public.

All outfitter/guides can and many are developing closer working relationships with the Forest Service and are of great benefit in helping maintain trails, teach wilderness ethics and leave no trace camping techniques.

(61b) The Forest Service does not maintain records concerning the age or disabilities of those obtaining outfitter/guide services. However, we do acknowledge that a large proportion of these forest users may seek and use outfitter/guide services.

(61c) No alternatives presented in this analysis eliminate legal outfitting/guiding from the wilderness. There are, however, specific areas where permits may not be issued because of existing heavy use. This situation is a concern and measures are being taken to control this activity.

(61d) Outfitters should and most do take pride in the lands on which they are privileged to operate. The fact that taking care of the resources and educating the public on ethical wilderness use is standard with many outfitters is recognized.

North Eastern Utah

Outfitters, Packers & Guides Association

outfitters have a long standing of serving the Forest Service with labor and equipment in clearing trails, packing out trash, curtailing erosion (waterbars) and evacuating people with sprained ankles and other emergencies.

Outfitters spend more time in the backcountry than forest employees. As a working partnership, their eyes and ears should be recognized as valuable in reporting fires and law violations. 61

This E.I.S. goes to great lengths to rationalize why Outfitters must sacrifice their use of some f the wilderness area. It is pointed out that Outfitters are economically insignificant to the local and state economies. 61f
An article in last week's newspaper headlines:

"Tourism makes Utah's economy healthy", read the lead in a recent report issued by the Utah Travel Council. Visitor spending has increased nearly 6 percent from 2.6 Billion in 1995. The new transient room tax of 1% has increased the local tax base by 12.3%.

This draft contains outdated and mis-leading economic indicators which could suggest that other statistics are outdated since the beginning of the E.A.C. process over three years ago.

Another contradiction comes from being told that Outfitters must sacrifice their wilderness use because they are not filling their alloted user days. It is pointed out in this draft that there is an over-use which is the reason for this document. 61g

There are reasons why some of the wilderness Outfitters are not filling their quota of user days. Most of them are new owners who are fixing up and improving their guest accomodations, replacing old horses and tack and generally improving a run down business. Meeting government codes and requirements takes time and money.

The biggest contradiction in this draft Forest document is this:

The Forest Manual reads: Wilderness is to be managed as one resource rather than a series of separate resources. 61h

This document proposes to manage the entire 640,000 acre wilderness area as three different resources. Under three different classifications, the resources will receive different care and guidance. 61i
Any mediocre law firm can prove our case on this one.

It sounds to us that the Forest service wants a divorce rather than a partnership. Be that the case, the affected Outfitters are prepared to seek legal representation. They have invested a great deal to improve these businesses and continue to seek a good, working partnership with the Forest Service. I grant you that there are heavily impacted areas in the wilderness, yet the Outfitters contribute to only 1% of the total use.

P.O. Box 129 · Whiterocks, Utah 84085 · (801) 353-4049

(61e)The presence of outfitter/guides are undoubtedly important in law violations, and resource management situations. Forest employee presence is as high as federal budgets and other work priorities allow.

(61f)The process used to develop alternatives for the EIS relied on the state of social and resource conditions as keys for choosing which areas are most suitable for outfitter/guide use and at what levels (see p. 4-9). The EIS states that outfitter/guide service contributions to local and state economies is difficult to measure, not that they are insignificant (p. 3-18). So the EIS relies on a discussion of the economic impacts on individual permittees as the most meaningful and ppropriate context for displaying impacts. The economic statistics used on page 3-17 to 3-18 and 4-16 to 4-20 were derived from data provided by individual Outfitter/Guide permittees and from contacts with or publications by area economists.

(61g)Managers of the HUW need outfitter services to meet wilderness objectives (as stated in the Outfitting and Guiding Needs Analysis).
Outfitters that are not or will not meet this management defined need (see LUC criteria page 2-2 and 3) may be replaced.

The reason for initiating this analysis, was not because of over use, rather managers needed one document to address all resources and combine management direction for the HUW on the Ashley and Wasatch Cache National Forests. Some over-use does occur in some areas in the HUW. These are addressed and will be highlighted for management actions so they do not exceed standards for physical and social wilderness resources.

(61h & i)The intent is not to manage as three separate resources but, to provide an aray of opprtunities and help managers allocate finite management resources.

North Eastern Utah

Outfitters, Packers & Guides Association

Education is the key to protecting our Wilderness area, not locking out the Outfitters. Money will be better spent educating people on ethical wilderness use, rather than trying to enforce defined boundaries where people will go anyway. The cost of enforcing these three class distinctions will far out-weigh the cost and effectiveness of educating the public.

This organization was formed so that Outfitters might greatly improve their business practices, form a stronger bond with public lands agencies, and to better educate the public on practical and ethical lands and resources management.

There are thousands of people who have supported wilderness areas, but who are now in opposition of any wilderness at all. This comes from Government agencies like the Forest Service, who seeks to enact more control and more legislation over it's use.

This organization is prepared to be a willing and working partner with the Forest Service. We are also prepared to fight if this comes to a divorce.

The NORTHEASTERN UTAH OUTFITTERS,PACKERS & GUIDES ASSOCIATION has only one alternative at this time. We must choose alternative five (no action) in the E.I.S. wilderness management document.

Sincerely yours,

Joe Jessup

P.O. Box 129 • Whiterocks, Utah 84085 • (801) 353-4049

61j

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(61j)Most Class boundaries were drawn according to topographical features and in relation to historical recreational use areas. As a result, the Forest Service does not expect that most visitors will need to be concerned with whether they have crossed a Class boundary and must now behave differently. In addition, some suggestions have been made to adjust the public wilderness maps to display the Classes in a visitor friendly way.

In addition, designation of classes is primarily used to focus management on popular areas while allowing allocation of resources to be applied as needed to maintain or monitor less popular areas.

(61k)Preference for Alternative 5 is noted.

ıs under attack by local outfitters

By Leslee E. Whiting

Those who serve as hired guides on trips into the High Uintas say proposals by Ashley National Forest Service officials for the future wilderness management targets them for discrimination.

Whiterocks resident, Joe Jessup, who serves as president of the Northeast Utah Outfitters, Packers and Guides Association, says the latest draft Environmental Impact Statement for amendment of the High Uintas Wilderness Forest plan lists four alternatives which would limit or exclude outfitter-guide businesses which use horses or mules, while allowing the public to travel into the same areas unrestricted.

The High Uintas Wilderness plan covers 640,000 acres of wilderness designation in Uintah, Duchesne and Summit Counties. It is designed to protect recreational areas, wildlife and natural habitats and watershed.

Jessup says that "although outfitters and guides were very involved in the public-input process, forest service officials did not include any of the recommendations proposed by the group when formulating the draft EIS.

"It's very discriminatory and is contradictory to itself," stated Jessup. "This final EIS draft has been prepared with a total disregard for the outfitter-guide permittees."

Gayne Sears, wilderness coorcinator for the Roosevelt/Duchesne Ranger District, says the outfitters are incorrectly interpreting the proposed alternatives. According to Sears, the proposals don't entirely exclude outfitters, but do limit their use of horses and mules on "catered trips" into the wilderness area by not allowing the animals to stay with the group over night. She admits, however, that "other users" would be allowed to go into the same area with livestock and camp overnight unrestricted.

"Wilderness is suppose to provide a challenge and a pristine environment. As managers we try not to market the wilderness to make a profit. Outfitters are in it to make a profit so there is a very thin line," she explained.

But Jessup says Forest Service officials are missing the boat when it comes to realizing the benefit the guides provide not only to a specific segment of the public - over 70% of pack trip clients are over 60 years old and many are physically challenged, they must rely on outfitters as their only means to enjoy a wilderness experience - but to the Forest Service itself.

"Outfitters have a long-standing record of serving the forest service with labor and equipment in clearing trails, packing out trash, curtailing erosion and evacuating people in emergencies," he commented. "The outfitter is one of the best tools the forest has."

This is one point where both groups agree. Sears says outfitters and guides do provide a "great example" and form a valuable "land ethics partnership" with the Forest Service. She says that in response to the criticism by outfitters and guides the Forest Service has extended the comment period prior to the release of the final EIS, which is expected in January or February.

Duchesne County Commission

Awards

UB Standard 11/8/96

Trip to jail for man who poses as a police officer

A Roosevelt man who claimed to be a "commissioned BIA officer" and tried to arrest a transient merchant has been booked into the Duchesne County jail for impersonating a police officer and other charges.

Police say 46-year old Roger D. Horrocks represented himself as a law enforcement officer when he tried to arrest Gilbert Martinez, 51 of New Mexico. The incident occurred around 4:30 p.m. Tuesday, Oct. 29 as Martinez was selling hot peppers from his camper in the parking lot of Stewart's Thriftway.

Martinez had permission from Stewarts to set up shop at the location, but Horrocks claimed the merchant was breaking the law and tried to place him under arrest, flashing his Ute Tribe Search and Rescue identification card as proof of his authority.

According to Roosevelt Police Cpl. Steve Hooley, Martinez knew Horrocks as "an acquaintance" and was aware that he was not a police officer. When Martinez packed up his goods and tried to leave the parking lot Horrocks allegedly rammed his pickup truck into the victim's camper causing approximately $2,500 in damages.

Martinez drove to his home and called police. Horrocks, who had placed a flashing red light on his pickup, pursued Martinez to his residence where he was later arrested. Two passengers in Horrock's pickup truck were taken into custody by BIA police and charged with intoxication.

Horrocks, who is wanted on two outstanding warrants in other jurisdictions, was charged with a third degree felony for aggravated assault, a class B misdemeanor for impersonating a police officer, and a class A misdemeanor for DUI.

TRUANCY

Continued from page 1

school suspension, and the fifth a juvenile court referral for truancy with possible out-of school suspension.

Truancy is most effectively stopped when parents assume responsibility for truant behavior. Facilitated and Without parental support policies are ineffective and discipline is not met out until the courts become involved.

Because there is no city ordinance which specifically addresses truancy,

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 North Vernal Ave.
Vernal, UT 84078

Bernie Weingardt
Forest Supervisor
Wasatch-Cache National Forest
8226 Federal Bldg.
Salt Lake City, UT 84138

Gentlemen:

We are writing to reaffirm our strongest urging that the US Forest Service manage the High Uintas Wilderness Area for the wilderness values which make it special and unique. We have reviewed the Draft Environmental Impact Statement for the High Uintas Wilderness Forest Plan Amendment in detail, and we have a number of questions and concerns which accompany our position.

Why are such urgent and important components of wilderness management as grazing, fish stocking, predator control, outfitting and guiding, and the management of adjacent lands pushed aside in the DEIS? These issues greatly affect the present and future character of the Uintas! These activities all compromise the wilderness characteristics which set the High Uintas apart from the common, widespread National Forest lands whose lakes are stocked, lands are grazed, predators are killed and ecosystems are managed for resource extraction and recreation. We urge the Forest Service to put together the long awaited management plan addressing these crucial issues, rather than what we find in the DEIS - a plan which under all alternatives presented allows the precious wilderness characteristics of the High Uintas to further degenerate under the pressures of fish stocking, predator management, and excessive recreational use. The stocking of nonnative fish directly affects the aquatic ecosystems to which they are introduced. The stocking also encourages high concentrations of anglers and campers near the stocked lakes, negatively impacting the shoreside vegetation and lake health. Where does the Forest Service stand on the introduction of nonnative terrestrial species? We understand mountain goats have been released adjacent to the wilderness area. Does the Forest Service anticipate that the mountain goats will somehow respect the wilderness boundaries, or did the Forest Service decide not much was at stake? We propose too much is at stake to manage the wilderness in such a careless way! Additionally, protecting ecosystems and the biological diversity they can harbor must address the greatest possible areas to protect the natural processes and genetic diversity which will form the foundation for any hope for the future health of both individual species and the ecosystem as a whole. A management plan proposed for the High Uintas Wilderness which does not address the adjacent lands, much of which still survives with wilderness attributes intact and remains eligible for wilderness designation, is incomplete at best and in our view irresponsible.

We find the proposed alternatives for dividing the wilderness into variously segmented "opportunity classes" destructive and unacceptable. Why is the Forest Service basically planning for the continued degradation of much of the wilderness? Even Alternative 3, which espouses to "maximize pristine character of the wilderness", contains more class II acreage, which is by definition compromised by human influence, than class I acreage! And the DEIS characterizes this compromised landscape the "desired condition" for the class II land. The other alternatives endanger the wilderness to even greater extents. And frankly we find it difficult to distinguish between them, whether by definition as in the cases of Alternatives 1 and 5, or by the end result we

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(62a & b)This is an integrated plan. It establishes desired conditions, standards and criteria for evaluating and monitoring the entire spectrum of resources that make up the wilderness. It focuses on basic resources - vegetation, air quality, soils, wildlife and fisheries habitat parameters. It also sets standards for recreation use that is integrated with the basic resources.

The fact that the plan does not specifically address grazing, fish stocking, and animal damage control does not mean the plan lacks integration. All the basic resource standards are applicable to each of these uses. The reason we are not dealing with these specific issues relates directly to law and policy.

Grazing is allowed in wilderness and any adjustments to the grazing program must be made in a context other than wilderness (Grazing Guidelines). Therefore, this plan is not the proper place to discuss the grazing program other than to integrate it with the vegetation and soil standards. The allotment management plan is the proper context to address grazing issues.

The Wilderness Act is specific in that it does not alter in any way the authority of the Division of Wildlife Resources to manage wildlife populations. The management of wildlife populations to meet wildlife habitat desired conditions and standards must be a cooperative effort.

Animal Damage Control (ADC) activities are the responsibility of the Animal and Plant Health Inspection Service (APHIS), again by law. Thus, we must work cooperatively with this agency to insure that wilderness values are protected when ADC activities take place.

(62c)We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Act, and will protect all HUW resources for future generations. The basic intent of this plan is to define the limits of acceptable change or thresholds for each Class. In the future, if that threshold is approached, management actions can be implemented to halt further degradation of wilderness.

(62d)The use of desired condition classes is applied to this plan as a means to allocate resources by acknowledging diversity in use patterns and user behavior. Establishing varying classes in the wilderness, allows management to use different strategies for different sections of the wilderness. The kind and intensity of management can be varied based on the desired condition sought. Without using classes to allocate management resources and efforts, there is an inherent danger that the entire wilderness may degrade to some minimum standard due to an unfocused management approach. Defining these classes provides managers with a tool to enhance the protection of wilderness.

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can envision from the segmentation of the wilderness into these opportunity classes which are difficult to monitor, impossible to enforce, and confusing at best to both the public and those who will have to protect the resource in the future. We urge the Forest Service to include as class I all 62e
acreage not directly affected by existing grazing allotments. We find the stated intent of the DEIS to manage portions of the wilderness for users who do not wish to experience or respect wilderness attributes confusing and destructive. There are plenty of places for anyone in Utah who wishes to 62f
experience something other than wilderness, and to compromise the ecology and wilderness recreation attributes of the High Uintas Wilderness on their behalf is destructive and shortsighted. The goal of wilderness management should not be to allow a slow degradation of the land to benefit varying definitions (your "user-type groups") of wilderness users, but to protect the wilderness resource for the future to benefit humankind through ecosystem protection and health and true wilderness recreation opportunities as defined by solitude on land with pristine wilderness characteristics.

We see this Draft Environmental Impact Statement as a series of conditions of varying 62g;
equal stability to various groups, setting up a compromise the Forest Service hopes everyone will find "not as bad as it could have been". We struggle with the notion that each generation of Forest Service employees will manage in this way, causing the High Uintas Wilderness Area to slowly lose the unique beauty of it's flora, fauna, and scenic wonder, and that future humans who "are visitors who do not remain" will wonder why we failed to protect what they someday will only hear and read about.

Sincerely,

Martin and Anne Skalz
4673 S. Eden View Court
South Jordan, UT 84095

Members High Uintas Preservation Council

(62e)Some areas not grazed and not in Class I do not have Class I values for reasons other than grazing. Designation of Class III is intended to facilitate management of the High Uintas Wilderness in the following ways:

1. It recognizes a historic pattern of use close to trail heads where the many (majority) of users are first time or infrequent visitors and/or those who do not necessarily seek higher risk activities (Group Three as given on pages 3-15 and 3-16 of the DEIS)
2. It can help divert many of the above group from Class I and Class II areas which will facilitate solitude in those areas.
3. It provides an opportunity (although a challenging one) to concentrate educational programs where they are most needed.

Important to this issue is the scale of soil and vegetation loss. Even in areas identified as class III, these losses on a watershed scale are not necessarily beyond the concept of a landscape that generally appears to have been affected primarily by the forces of nature, with the imprint of man's acts substantially unnoticeable.

Soil and Vegetation loss and other impacts are addressed in "indicators and standards" as given on pages 2-9 through 2-17.

(62f)We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

Realizing many of the activities visitors participate in are not wilderness dependent activities, it is our policy to try and steer them to non-wilderness areas. Increased user education coupled with wilderness education for employees are examples of management approaches employed by the Forest Service to mitigate conflicts between user expectations and wilderness values.

(62g)We feel the desired condition statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

Dear Bert Kulesa + Bernie Weingardt, 38

My name is Beth R. McKenzie + I am a student at Earlham College. This summer I participated in the Wilderness program in the High Uintas for 3 weeks. It was amazing experience. I have never been hiking before at all and had minimal camping skills. But our leaders taught us greatly about low impact camping + preserving nature. One of the greatest parts of the trip that developed was the comradere amongst us. It was a chance for a small number of us to get to know one another in such a way that has led to ongoing friendship here at school. 63a

I understand that you are thinking about closing certain areas to groups larger than 7. I tried to read the report on the management plan but it was a little too technical for me. Nevertheless 63a

63aPresently, 20-30% of the visitors to the HUW travel in groups more than 7. Managers plan to target larger groups for extra education efforts, but it is the responsibility of the visitor to understand and follow leave no trace techniques, especially while traveling in pristine areas.

According to the literature (Cole, 1989), popular guide books (Davis and Veranth, 1993) and leave no trace publications (Harmon, 1994), large groups can cause more resource impacts in more pristine areas. The Class I desired condition description challenges those who visit these areas to travel in small groups. For overnight use, 7 people and 7 stock will continue to be the standard to measure this desired condition (pg 2-14). If and when (through monitoring) this standard is breached, management actions to restrict group size in Class I may be adopted.

The proposal encourages compliance with small group size and spacing as groups move and camp in Class I, but no limits on total numbers are proposed at this time. In light of these sideboards, Earlham College may have to conduct their trips differently, but we see no evidence that their program will be negatively ~~affected~~.

I feel compelled to share the joy I heard in the Uintas with you. Because [I think by limiting the number in groups you are cutting down on very valuable resource 63a
Opportunities for us all, But especially for Earlham College in particular.]

Thank you for your consideration in this matter.

Sincerely,

Helen R McNama

P.S. I have enclosed a picture of most of our group. We are standing on [illegible] pass after an attempt at [illegible]. [illegible] that was somewhat [illegible] due to a large storm [illegible] while we're climbing. [illegible] teamwork & support we all made it down safely.

Comments on Draft EIS for the Management of the High Uintas Wilderness

The comments that follow come from the recreation management perspective of a wilderness ranger in Grandaddy Basin the summer of 1996. As such, the comments tend to focus on the recreation aspects of the EIS and are limited by my experiences and observations in Grandaddy Basin, having spent no appreciable time in any other part of the HUW.

It is encouraging that the Ashley and Wasatch-Cache National Forests are taking the first step toward developing an updated, cohesive plan for managing the HUW. Establishing an appropriate, integrated management framework to guide future project-level decisions is essential to preserving the wilderness character of the HUW. The fact that the HUW is the largest wilderness in Utah and considered a 'flagship' of wildlands in the state emphasizes the importance of this document and highlights the probability that this EIS will be used as a model and set a precedence for the management of other wilderness areas in Utah.

Fire Management in the Wilderness It is great to see the Forest Service recognizing that natural fires play a crucial role in nature. Fire suppression in wilderness is the single greatest human impact unquestioningly allowed in wilderness. Hopefully in the near future fires will actually be monitored in the HUW instead of put out. 64a

Desired Condition Classes There is value in recognizing that different parts of a wilderness have different social, biophysical, and managerial characteristics, and in developing management strategies specific to each type of area. Defining three 'desired condition classes' within the HUW could help guide management and allow users to more easily obtain the type of wilderness experience they desire. Given the fact that these desired condition classes will define acceptable impacts on nature, the type of recreation experience available to wilderness users, and will be used to justify future management action or inaction, great care must be taken in defining the desired condition classes. The definition of each class must be in-line with the spirit and letter of the 1964 and 1964 Wilderness Acts and with the Forest Service Manual's wilderness management guidelines. 64b

The definitions of desired condition classes I and II appear to meet the above legal criteria. There is considerable reason for concern with certain parts of the definition of desired condition class III. The definition of class III recognizes that the natural resources in certain areas have been substantially impacted on a very localized scale, but directs that those impacts not be allowed to occur on a scale that becomes "significant within the watershed that contains these facilities" (EIS, S-12). In relation to the biophysical aspects of the wilderness, the above part of the definition of Class III areas appears to be consistent with the 1964 Wilderness Act's definition of wilderness as an area "which is protected and managed so as to preserve it's natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." 64c

The part of this EIS's definition of desired condition class III that deals with the social or visitor experience aspects of class III wilderness is very questionable and should be reconsidered with 64d

64a) Yes, support is noted.

64b) We feel the desired conditions statements and standards described on pages 2-2 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

64c & d) The intent for all the classes described in this document has always been to comply with the Wilderness Act of 1964. The descriptions of these Classes have been carefully analyzed and reworded to ensure compliance with the Acts.

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great care. Class III wilderness is defined as an area where "outstanding opportunities for solitude and unconfined types of recreation are limited", "encounters with other groups are common", and "conditions that result in user conflicts are common". 64d The 1964 Wilderness Act, the 1984 Utah Wilderness Act, and the U.S. Forest Service Manual do not define wilderness as an area with limited opportunities for solitude, or a place where user conflicts are to be expected. In fact, the Forest Service Manual specifically states that managers are not to "maintain internal buffer zones that degrade wilderness values" (EIS p. 1-4). 64e Class III wilderness, as currently defined in this EIS, is an internal 'buffer zone' that institutionalizes the acceptance of degraded wilderness. It is vitally important that these aspects of the definition of Class III be changed.

The reasons for the EIS defining class III wilderness as it does are understandable. It reflects the reality that increased demand for wilderness recreation, limited Forest Service resources, and past management action/inaction have all resulted in these conditions currently being present in some parts of the High Uintas Wilderness. Re-establishing truly wilderness conditions to these parts of the High Uintas can seem a daunting task, requiring more intentional and possibly controversial management actions. It is more convenient, and some will say more 'realistic', to accept these non-wilderness social conditions and attempt to relinquish the Ashley and Wasatch-Cache National Forests from their legal responsibility of ensuring that the HUW currently provides and continues to provide important wilderness values such as solitude.

It may be argued that the HUW still provides "outstanding opportunities for solitude and unconfined types of recreation", just not in the class III areas. After all, in the preferred alternative, desired condition class III represents only 9% of the wilderness area. This reasoning may be logical and relevant when considering aspects such as vegetation and wildlife, but it is very misleading when considering visitor experiences. 64f Though class III represents only 9% of the surface area of the wilderness, it represents the vast majority (perhaps 70-80%) of visitor experiences in the wilderness. Hence for the overwhelming majority of visitors, the High Uintas Wilderness will not offer the unique wilderness values (especially solitude) that the Wilderness Acts charge the Forest Service to protect. These values should be available to all wilderness visitors, not merely those with the time, willingness, and knowledge to go cross-country and stay at lakes that are not fishable. They are the values that wilderness was created to protect.

If managers simply accept degradation of 9% of the wilderness today, what will be the response in the near future, as recreation pressures continue to grow, as projected in the EIS? Class III wilderness represents a compromised, degraded wilderness. How much will the unique values supposedly protected by wilderness designation be compromised as pressure mounts? This EIS makes the non-wilderness social conditions prevalent in Grandaddy Basin acceptable to managers and removes the impetus for the Forest Service to re-establish wilderness values in the Grandaddy 64g Basin and other areas like it. This is very convenient for managers, as they then do not have to carefully manage those areas, making difficult and controversial management decisions. However, convenience to the Forest Service is not supposed to be a criteria in protecting wilderness values.

Another reason for concern over the definition of class III wilderness is that, because it is not consistent with the intent of the Wilderness Acts, nor with the U.S.F.S. Manual, it makes the

(64e & f & g A 5) Your comments (and others) prompted the ID team to review the Desired Condition for Class III. Please see pg 2-5 in the EIS for changes in the desired condition description for Class III.

We feel the desired conditions statements and standards described on pages 2-5 through 2-17 meet or exceed the intent of the Wilderness Acts and will protect all HUW resources for future generations.

When and if social standards are exceeded (as they have been in some Class III areas), management actions will be implemented regardless of whether they are controversial or not.

Ashley and Wasatch-Cache Forests very vulnerable to legal actions directed at forcing the forests to manage all of the High Uintas Wilderness to protect the values stated in the Wilderness Act. Such a legal battle would waste scarce economic and human resources.

It would be better to change the definition of desired condition class III to read something like "Outstanding opportunities for solitude or primitive and unconfined types of recreation are *more limited than in the above classes.*" "Encounters with other groups...*are more common...*" and completely delete "Conditions that result in user conflict are to be expected" because this simply means that the Forest Service has failed to manage the area appropriately. 64h

Along with these changes in wording must go a commitment to re-establish the social aspects of wilderness values that have been allowed to degrade in areas like Grandaddy Basin. Grandaddy Basin currently does not provide a wilderness experience, though it can with proper hands-on management strategies. 64i

Indicators and Standards

The use of indicators and standards in determining when additional management actions are required to maintain desired conditions has much logical appeal. However, the difficulties of identifying appropriate, relevant indicators and establishing realistic standards that can feasibly be monitored given current and future resources are considerable. A great part of the success of the LAC process depends on the accurate and consistent monitoring of good indicators. The question to be raised then is this: Does the Forest Service have the ability to follow through on what is proposed in the indicators, standards, and monitoring, and how will this follow-through be insured? Looking through the monitoring section, it is apparent that monitoring plans for many of the indicators consist of "field observation and incident report analysis". Presumably this information would come from wilderness rangers. 64j

My experience this summer indicates that most of the information needed for the monitoring is not currently being gathered consistently by rangers. Relying on incident reports is a particularly inadequate method of monitoring because rangers rarely write incident reports for the indicators in the plan. The idea of using rangers to do much of the non-technical monitoring is logical and very cost effective. It can even be successful if proper training and supervision is provided and if paperwork for collecting the data is well designed and made easy. If the above criteria are not met, the monitoring done by rangers will be worthless (actually, it will be detrimental).

I don't have adequate knowledge to make observations about the indicators and standards for air, water, and soil quality, wildlife and fisheries, or vegetation. I would like to make several observations about the indicators and monitoring plans related to recreation. Monitoring of four of the seven recreation indicators relies on "field observation and incident report/registration card analysis". This fact emphasizes the earlier comment on the need to systematize collection of this information by rangers. Currently, it would be completely misleading to use ranger's incident reports and there is no systematic recording of field observations (on Districts 3 & 4). 64k

(64h)Ease of access is the major cause of increase visitation in the Grandaddy Basin. Use of good Leave No Trace principles would alleviate most of the degradation perceived. Intensified management and increased assignment of wilderness rangers has been one attempt at curbing the loss of wilderness experience.

(64i)Complexity is inherent in ecosystem management. Budgetary constraints are a reality. Innovative means of accomplishing our tasks are essential. Writing proposals for grants and seeking partnerships with non-governmental organizations is essential to accomplishing the Forest Service missions. The development of well thought out management plans help to focus the allocation of resources, i.e., the establishment of desired condition classes helps to serve that purpose. Monitoring of biological and sociological systems are complex and cannot be performed all at once. But, this plan establishes the frame work to direct efforts into the future.

(64j)Data collection does need to be systematic to be consistent and useful. This does not negate the usefulness of subjective comments generated by wilderness rangers.

In terms of the indicators selected for recreation, it seems that a couple are of questionable utility 64l
in management and that some very important indicators (those related to solitude) are missing. Length of stay at one campsite is not a particular management problem, in Grandaddy Basin at least. Also, it is not feasible to monitor the standards established for this indicator by field observation and incident report analysis because rangers are not going to encounter most visitors in class I wilderness (especially for 2 nights) and we are not going to remember who camped where from one tour to another. Basically, length of stay at one campsite is a non-issue for
management and should be removed so as to not distract from gathering truly useful data. 64l

It is not clear what campsite density (distance between occupied campsites) is attempting to 64m
measure. How are rangers (or anyone else) to determine the probability that occupied campsites are X distance apart? What does that mean in terms of guiding management actions? This seems very impractical and unworkable in the real world. Also, monitoring this indicator only once or
twice every 5 years is totally inadequate. Campsite density does seem to be an attempt to establish 64m
some kind of indicator of solitude. It makes sense that the more campsites there are in a given area, the less opportunity for solitude in camp. This assumes that visitors are aware of every single campsite around them. If, however, visitors are not aware of other campsites (i.e. as a result of good management, they are hidden from view and not loud) it becomes irrelevant how
many 'occupied campsites' exist within a certain distance. What is important to measure here is 64m
occupied campsites that visitors actually *perceive* through site or sound. This could be done by rangers routinely asking (and recording) visitors how many other campsites they are aware of around the lake they are camped at.

Given the importance the Wilderness Act places on the value of solitude, it seems prudent to have 64n
a couple of indicators of solitude. Campsites *perceived* around the lake is one. Another easily
monitored indicator would be the number of campsites visible from trails and/or lakeshores. 64n
Rangers could document this information on a prepared matrix as they go about their normal patrols. Number of groups/people encountered on trails/around lakes is another indicator of solitude that rangers could easily record, given a well designed log sheet.

Finally, one of the factors influencing the sense of solitude the most is noise or the audible 64o
evidence of others. This is especially true in Grandaddy Basin where Boy Scout troops are
common. This indicator could be monitored by routinely asking visitors if they felt there was 64o
much human noise in the area where they camped/fished. Rangers should also keep records of their own observations of noise levels, and make it a point to camp around different lakes over the summer.

To close this section, let me re-reemphasize the importance of making the recording of all the data rangers can and should monitor straight forward and simple. This summer we had three different forms we were supposed to record information on, many parts of which were redundant. The result of this is that the quality of the data gathered was not as high as it should have been and we
were frustrated. Rangers can provide much high quality, useful information needed to monitor 64p
indicators, but they must be prepared to do so through good training, well designed recording systems, and helpful supervision.

Michael D Smith
~~[illegible] Ebola Rd #13~~ 324 E Magnolia
Ft. Collins, CO ~~80525~~ 80524

(64l) Especially for stock users, Cole (1987) and others do suggest that parties keep their stay at one campsite short. Length of stay is included as an indicator of overuse (especially in pristine settings), and of inappropriate occupancy of the wilderness.

(64m & n & o) These are good suggestions for indicators of solitude, but prior data has not been collected to set meaningful standards. We have added a section to the standards chart (pg 2-15) to prompt continued work to define indicators and standards for measuring solitude.

(64p) This is an excellent recommendation and will be incorporated into future operating procedures.

CONTACT FORM

Date 12/13/96

Title of Document HUW EIS

Name of Project Coordinator G Sears

Name Eldon Monson

Address Bluebell UT

Phone

Comments We discussed wilderness in general + the HUW EIS. comments 1) afraid of regulations making him unable to enjoy the HUW 2) would like outfitters to be limited before general public. 3) doesn't want lines drawn on map 4) is enthusiastic about education

Attachments Yes__ No__
How many?

Location Roosevelt FS office

Name and signature of Person Taking Comments

Signature of Person Commenting

Access Course

11/93 Handout 2.6

chapter eight

GLOSSARY

Chapter VIII

Affected Environment. The natural environment that exists at the present time in an area being analyzed

Air Quality Related Values (AQRV). Features or properties that are important for preserving wilderness character and that could be adversely affected by air pollution

Airshed. A geographic area that, because of topography, meteorology, and climate, shares the same air Class I - any area designated for the most stringent protection from degradation, including but not limited to all wildernesses over 5,000 acres in existence as of August 1977

Allotment (range allotment). The area designated for use by a prescribed number of livestock for a prescribed period of time Though an entire Ranger District may be divided into allotments, all land will not be grazed, because other uses, such as recreation or tree plantings, may be more important at a given time

Appropriate Suppression Response. The planned strategy for suppression actions (in terms of kind, amount, and timing) on a wildfire which most efficiently meets fire management direction under current and expected burning conditions The response may range from a strategy of prompt control to one of containment or confinement

Assigned Site. A campsite temporarily designated and authorized for occupancy and use by an outfitter for a specific length of time where no permanent facilities are permitted and the outfitter is charged a use fee Interchangeable with a Reserved Site or Priority Use Site

AUM (animal unit month). The quantity of forage required by one mature cow and her calf (or the equivalent, in sheep or horses, for instance) for one month

Best Management Practices (BMP). A practice or combination of practices that are the most effective and practical means of preventing or reducing pollution from non-point sources

Biological Diversity. The number and abundance of species found within a common environment This includes the variety of genes, species, ecosystems, and the ecological processes that connect everything in a common environment

Boggy Areas. Portions or trail in wet ground causing resource damage and/or safety concerns (Areas greater than 10' in length and 2' in width)

Cache. A place for storing (usually concealed) unwieldy equipment when a site is not occupied, or a place for storing supplies for future use

Carrying Capacity. The maximum level of use an area can sustain without exceeding the social and environmental conditions set by management

Cathole. A small hole dug for one time use to bury human waste Catholes are dug away from water sources, campsites and trails, approximately six to eight inches deep in mineral soil

CFR. Code of Federal Regulations

Cultural Resources. The remains of sites, structures, or objects used by people in the past, this can be historical or pre-historic

Desired Conditions. Land or resource conditions that are expected to result if goals and objectives are fully achieved

Desired Condition Class. A management area that has common direction to achieve a specific condition

Dismantled. Completely disassembled to the basic components from which it was originally constructed

Drainage. see watershed

Drop Camp. A temporary unreserved campsite used by an individual or party who compensates an outfitter for packing camp equipment, people, meat or supplies to or from the site The site is not reserved The outfitter may or may not furnish camp equipment or supplies The camp will be removed when the requesting client(s) terminate their stay The outfitter is responsible for cleanup of the site Outfitter personnel may not stay at the campsite longer than one night Only permitted outfitters are authorized to engage in packing drop camps

Ecosystem. An arrangement of living and non-living things and the forces that move among them Living things include plants and animals Non-living parts of ecosystems may be rocks and minerals Weather and wildfire are two of the forces that act within ecosystems

Ecosystem Management. An ecological approach to natural resource management to assure productive, healthy ecosystems by blending social, economic, physical, and biological needs and values

Endangered Species. A plant or animal that is in danger of extinction throughout all or a significant portion of its range Endangered species are identified by the Secretary of the Interior in accordance with the Endangered Species Act of 1973

Endemic Plant/Organism. A plant or animal that occurs naturally in a certain region and whose distribution is relatively limited geographically

Environmental Assessment (EA). A brief version of an Environmental Impact Statement (See Environmental Impact Statement)

Environmental Impact Statement. A statement of environmental effects of a proposed action and alternatives to it The EIS is released to other agencies and the public for comment and review

Erosion. The wearing away of the land surface by wind or water

Erosion Classes. A method of estimating the degradation of soils and water resources in areas of concentrated recreation use Erosion classes consider the areal extent of easily observable site characteristics to quantify the occurrence of such detrimental conditions as soil erosion, compaction and displacement by trampling

Erosion Class I. Upland areas have bare soil, concave or entrenched appearance, and exposed pebbles or rocks Lowland and riparian areas have footprints or hoofprints that do not hold water overnight in the absence of additional rainfall

Erosion Class II. Upland areas have bare soil, concave or entrenched appearance, exposed pebbles or rock, and gullies, ruts or rilling Lowland and riparian areas have footprints or hoofprints that hold water overnight in the absence of additional rainfall

Erosion Class III. Upland areas have bare soil, concave or entrenched appearance, exposed pebbles or rock, gullies, ruts or tilling, and sediment observed at the toe of slope being deposited into a stream, lake, spring or wetland Lowland and riparian areas have footprints or hoofprints that hold water throughout the season, and that persist from year to year

Exotic Species. A species that enters or is introduced into an ecosystem beyond its historical range, except through a natural expansion

Fire Regime. The characteristics of fire in a given ecosystem, such as the frequency, predictability, intensity, and seasonality of fire

Fisheries Habitat. Streams, lakes, and reservoirs that support fish, or have the potential to support fish

FP. Forest Land and Resource Management Plan (Forest Plan)

FSH. Forest Service Handbook

FSM. Forest Service Manual Policy - a guiding principle, plan, or course of action as determined for all Forest Service management activities

Fuels. Plants and woody vegetation, both living and dead, that are capable of burning

Fuel Wood. Wood cut into short lengths for burning

GIS (geographic information systems). GIS is both a database designed to handle geographic data as well as a set of computer operations that can be used to analyze the data In a sense, GIS can be thought of as a higher order map

Group Size. The maximum number of persons authorized to travel together under one permit (also referred to as "Party size")

Habitat. The area where a plant or animal lives and grows under natural conditions

Habitat Capability. The ability of a land area or plant community to support a given species of wildlife

Habitat Diversity. A number of different types of wildlife habitat within a given area

High Use Season. July 1 - September 15

Historic Range of Variability. Characterization of fluctuations in ecosystem conditions or processes over time

HUW. High Uintas Wilderness

Indicator. Items that can be measured to gauge the overall condition of a desired condition class

Indigenous Species. Any species present in an ecosystem in its historic range, or naturally expanded from its historic range Species of fish traditionally stocked before wilderness designation may be considered indigenous if the species is likely to survive (Policies and Guidelines for Fish and Wildlife Management in National Forest and Bureau of Land Management Wilderness - FSH 23 1 ex 1)

Interdisciplinary Team (IDT). A group of individuals with different training assembled to solve a problem An interdisciplinary team is assembled because no single scientific discipline is sufficient to adequately identify and resolve issues and problems Team member interaction provides necessary insight to all stages of the process

Issue. A subject or question of widespread pubic discussion or interest regarding management of National Forest System lands

Landscape. A large land area composed of interacting ecosystems that are repeated due to factors such as geology, soils, climate, and human impacts Landscapes are often used for coarse grain analysis

Land Use Planning. The process of organizing the use of lands and their resources to best meet people's needs over time, according to the land's capabilities

Limits of Acceptable Change (LAC). A planning system in which the amount of change to be allowed is measured by means of quantitative standards Appropriate management actions are identified and procedures for monitoring and evaluating management performance are established

Livestock. Generally an animal such as cow or sheep raised for meat or wool production

Management Action. Any activity undertaken as part of the administration of the Forest

Management Ignited Fire. A fire started by a scheduled, deliberate management action

Matrix. The least fragmented, most continuous pattern element of a landscape, the vegetation type that is most continuous over a landscape

Mechanized Equipment. Any contrivance for moving people or material in or over land, water, or air, having moving parts, that

provides a mechanical advantage to the user, and that is powered by a living or non-living power source This includes, but is not limited to, sailboats, hang gliders, parachutes, bicycles, game carriers, carts and wagons It does not include wheelchairs when used as necessary medical appliances It also does not include skis, snowshoes, rafts, canoes, sleds, travois or similar primitive devices without moving parts

Minimum Tool. Apply only the minimum impact policy, device, force, regulation, instruments or procedure to bring about a desired result

Monitoring and Evaluation. The periodic evaluation of forest management activities to determine how well objectives were met and how management practices should be adjusted

Motorized Equipment. Machines that use a motor, engine, or other non-living power sources This includes, but is not limited to, such machines as chain saws, aircraft, snowmobiles, generators, motor boats and motor vehicles It does not include small battery or gas powered hand carried devices such as shavers, wrist watches, flashlights, cameras, stoves, or other similar small equipment

National Environmental Policy Act (NEPA). An act of Congress that declared the productive harmony with nature and protection of the environment to be a national policy

National Wilderness Preservation System (NWPS). Federal lands managed that have been designated by Congress to be managed as wilderness by the FS, NPS, BLM, and FWS (see the Wilderness Act, 1964)

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OUTFITTER/GUIDE NEEDS ANALYSIS

Appendix A

INTRODUCTION

This document is an analysis of the "public need" for commercial outfitting and guiding (hereafter written as O&G) services in High Uintas Wilderness located on the Roosevelt and Duchesne Ranger Districts, Ashley National Forest, and the Mountain View, Evanston, and Kamas Ranger Districts of the Wasatch-Cache National Forest

This document is written in a manner to provide information for readers who are not familiar with Forest Service policy and direction concerning the analysis of "public need" as a component of issuing O&G permits This is *NOT* an Environmental Analysis (EA) of the effects of O&G in the High Uintas Wilderness This *IS* a document that will be used to assess the appropriateness of current and future outfitted uses in the High Uintas Wilderness

OUTFITTING AND GUIDING ON NATIONAL FOREST SYSTEM LANDS

The Forest Service issues O&G permits to respond to a management (public) need to provide high quality public services and assistance to the recreating public user of National Forest System lands

Permits are issued to assure a service the agency requires is provided to meet these components of its mission provide public service, protect public health and safety and help attain management goals and objectives

Outfitter permittees exist on National Forest System lands because the Agency desires their assistance in accomplishing management goals and objectives They are an agent to provide services to the public The relationship between the Forest Service and an outfitter is one of a "partnership "

Issuance of an O&G permit requires a five-step process

1 Determination of a demonstrated public need has been completed and documented by the Forest Service (this document)

2 The analysis and decision has been documented and linked to the Forest Plan

3 The issuance proposal has been fully evaluated and the appropriate NAPA analysis/documentation had been completed

4 The bid prospectus process has been followed for solicitation of applicants, evaluating competition and providing required documentation/information on applicants

- Applicant has proven financial capability and possesses adequate experience/expertise to operate a successful sustainable business

- The most highly qualified applicant(s) has been selected via a formal documented applicant selection/use allocation process

5 The permit is issued consisting of

- The basic permit

- Operating plan, this is for the tenure of the permit

- Annual itinerary (annual operating plan)

General direction on the issuance of O&G permits is contained in Forest Service Handbook (FSH) 2709 11 and Forest Service Manual (FSM) 2320 13g

FSH 2709 11, 41 53a - States the Agency should issue and administer permits for outfitter and guide activities to meet general public recreation service needs identified through forest land and resource management planning

FSH 2323 13 - States that issuance of outfitter and guide permits should be consistent with management as wilderness where they are necessary to help segments of the public use and enjoy wilderness areas for recreational or other wilderness purposes

FSM 2323 13g - States the Agency should address the need for and role of outfitters in the Forest plan, and must ensure outfitter and guides provide service in a manner compatible with use by other visitors and which maintains the wilderness resource

FSM 2712 2 - States that a permit may be issued when there is a demonstrated public need for the service

DETERMINATION OF PUBLIC NEED

What is "public need?"

Public need is a need identified by the Forest Service considered essential or required for the well-being of the public, and to meet the intent of the Forest's mission to manage and protect wilderness resources, provide for public safety, and provide high quality public recreation services (Barker, 1993)

Barker (1993) states that a prospective outfitter's desire for a permit does not constitute a public need, nor does market generated demand (solicited calls/letters) by a potential applicant constitute a pubic need The Forest must determine the need based on is mission, and resource capability Commercial use of public lands is permitted only to help achieve the mission of the Forest Service

Evaluation Criteria. The following criteria will be used in issuing and evaluating outfitter and guide permits and service day allocations

Criteria A. Ability to accomplish environmental and land stewardship education and interpretation goals

Criteria B. Ability to accomplish resource protection and other National Forest goals (i e trail maintenance/construction and

rehabilitation, and campsite rehabilitation and re-location)

Criteria C. Service Days actually used as compared to service days authorized. This may reflect either an increase or decrease in authorized service days. Example 1) an outfitter may be authorized 200 service days per season, and for three years running, use only 100 service days. Unless there are extenuating circumstances (weather, fire closure, business changes hands in middle of season, etc.), this indicates less citizen need for commercial outfitting services and would result in a decrease in authorized service days. Example 2) an outfitter may be authorized 200 service days and for three years running their actual use bumps this limit. At this point the outfitter can request more authorized service days if 1) there are service days available in that drainage (refer to service day ceiling) and 2) documentation is presented on how they meet these criteria.

Criteria D. Documented citizen requests over time for particular commercial services.

Criteria E. Ability of the agency to monitor existing permits for compliance with the forest plan and special use permit requirements. This may include:

- Self-monitoring of operating plan requirements (i.e. permittee evaluation of higher use areas using photographs, campsite monitoring, etc.)
- Agency budget allowance for proper and effective administration and monitoring of outfitter permits

Criteria F. Lakes and trail corridors in Duchenne River, Henrys Fork, Smiths Fork and East/Stillwater Forks of the Bear River drainages are the least appropriate for outfitting operations because the current public use meets or exceeds the desired conditions for that area.

Criteria G. Outfitter knowledge of area, safety, equipment and quality of business and customer service.

- Guides' knowledge of the High Uintas, including years and type experience in the business
- Safety practices and training
- Condition of stock, tack and camping equipment
- Client evaluations of service and use of generally accepted accounting and business practices

CONCLUSION

Based on 1) managers' need for assistance in accomplishing wilderness management objectives, 2) the need to provide for public safety, and 3) the need to provide high quality public recreation services, the use of outfitter and guide services is essential to the stewardship of the High Uintas Wilderness.

Based on 1) the relatively short use season [three to four months depending on the weather], 2) the current high public use, and 3) the availability of non-wilderness areas for commercial outfitted operations, the service days available for outfitted operations in the

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HUW may or may not completely provide for a viable outfitted business in and of themselves. Because the Agency recognizes a suitable profit margin is prerequisite to maintaining a high quality operation, the number of authorized operators will be limited to aid in providing a profitable supply and demand ratio.

PRESENT PUBLIC USE COMPARED TO COMMERCIAL USE

Livestock. About 15-20% of the visitors to this wilderness use livestock to assist with their trip. Many of the local repeat visitors who use stock have the necessary equipment to conduct a trip without the use of an outfitter. Some of the local and many of the non-local visitors who use stock do not have the necessary equipment to conduct a trip without the use of an outfitter. For those visitors that do not have the desire or capability to obtain the skills and equipment for livestock trips an outfitter is almost a prerequisite for them to have this opportunity. The districts have been asked by non-residents for names of outfitters that might be operating in the High Uintas Wilderness.

Non-livestock. About 80-85% of the visitors to this wilderness do not use livestock to assist with their trip. Most of the present non-livestock outfitter/guide use is from non-local visitors.

PRESENT COMMERCIAL USE (1996 data)

There are currently 10 existing outfitter/guide permittees in the High Uintas Wilderness. Thirty-five percent of the outfitted use is assisted with stock, and 65% is non-stock.

There are two hunting outfitters (300 service days each, use period 9/1 to end of fall season) for the north slope and a maximum of five hunting and fishing outfitters on the south slope (no service day limit, use period 7/1 to end of the fall season).

There are also four educational/institutional (non-stock) outfitters. These outfitters use both the north and south slopes of the wilderness. A service day ceiling is not identified, however O/G use is discouraged from using highly popular basins and trailheads.

South Slope

Livestock Outfitters

U-Bar Wilderness Ranch. Operates from the U-Bar Wilderness Ranch located in Uinta Canyon (Resort Permit). This outfitter provides public opportunities for both wilderness and non-wilderness outfitted and guided pack trips for drop camps, fishing, hunting, sight-seeing, cabin rentals and other recreation activities. They have been operating in the High Uintas for 10+ years from this location (changed hands three times) and are authorized service days both in and outside the wilderness. (An annual permit.)

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Moon Lake Wilderness Guides & Outfitters. Operates in Lake Fork and Yellowstone drainages. This outfitter provides public opportunities for wilderness and non-wilderness outfitted and guided pack trips for drop camps, fishing, hunting, sight-seeing, and other recreation activities. They have been operating in the High Uintas for 10+ years (changed hands three times) and are authorized service days both in and outside the High Uintas Wilderness. (An annual permit.)

Rock Creek Ranch. Operated from Rock Creek Resort located in Rock Creek Canyon (Resort Permit). Provides public opportunities for wilderness and non-wilderness outfitted and guided pack trips for sight-seeing, fishing, hunting, cabin rentals and other recreation activities. They have been operating in the High Uintas for five years and are authorized service days both in and outside the High Uintas Wilderness. (An annual permit.)

Wilderness Outfitters. Operates in Rock Creek Drainage and North Fork Duchesne River. Provides public opportunities for wilderness and non-wilderness outfitted and guided pact trips for sight-seeing, fishing, hunting and other recreation activities. They have been operating in the High Uintas for five years (changed hands one time) and are authorized service days both in and outside the High Uintas Wilderness. (An annual permit.)

North Slope

Ken Aimone Outfitters. Operates in Burnt Fork and Beaver Creek drainages. Provides public opportunities for wilderness and non-wilderness outifitted and guided pack trips for hunting. They have been operating in the High Uintas for 10 years and are authorized service days both in and outside the High Uintas Wilderness. (Presently a five-year term permit.)

Rich LaRocco Outfitters. Operates in East Fork Bear River drainage. Provides public opportunities for wilderness and non-wilderness outfitted and guided pack trips for hunting. They have been operating in the High Uintas for eight years and are authorized service days both in and outside the High Uintas Wilderness. (Presently a five-year term permit.)

Non-Livestock Outfitters

Colorado Outward Bound School. Located in Denver, Colorado, this outfitter provides opportunities for the public to learn outdoor and wilderness skills, physical fitness, and character building. They have been operating in the High Uintas for eight years and are authorized service days both in and outside the High Uintas Wilderness. (Presently an annual permit.)

Earlham College. Locate in Richmond, Indiana, this outfitter teaches both wilderness skills and academic subjects. Including backpacking, survival techniques, search and rescue, first aid, and other skills. They have been operating in the High Uintas for 17 years and are authorized service days both in and outside the High Uintas Wilderness. (Presently a five-year term permit.)

America's Adventure, Inc. Located in Golden, Colorado, this outfitter trains and supervises young adults in hiking,

environmental education, wilderness ethics, and other outdoor skills They have been operating in the High Uintas for five years and are authorized service days both in and outside the High Uintas Wilderness (Presently an annual permit)

Sierra Club Leaders from around the country plan and lead trips for this San Francisco, California based organization This outfitter provides public opportunities for guided backpack trips into the wilderness, teaching wilderness ethics and other outdoor skills They have been operating in the High Uintas for three years (Presently an annual permit)

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HUW Outfitters and Guides Service Days maximum authorized per drainage

DRAINAGE	Alternative 1		Alternative 2		Alternative 3		Alternative 4		Alternative 5	
	stock	non-stock	stock	non-stock	stock	non-stock	stock	non-stock	stock	non-stock
1. Duchesne	0	0	0	50	0	0	0	50	0	
2. Rock Creek	300	200	300	200	50	50	400	500	administrative limit*	
3. Lake Fork	350	600	350	650	350	600	400	700	administrative limit	
4. Yellowstone	300	550	100	300	300	550	350	600	administrative limit	
5. Uinta	300	450	200	300	75	150	300	450	administrative limit	
6. Burnt Fork	150	0	150	150	25	0	75	50	300	admin limit
7. Beaver Creek	150	0	75	150	50	0	100	100		admin limit
8. Henrys Fork	0	150	0	150	100	75	50	100	0	admin limit
9. Smiths Fork	0	300	0	300	125	150	75	100	0	admin limit
10. E/M/W Blacks Fork	250	300	250	250	200	250	250	150	300	admin limit
11. East Stillwater Fork Bear	50	0	50	50	25	0	50	150		admin limit
TOTAL	1850	2550	1475	2550	1300	1825	2050	2950	admin limit	
	4400		4025		3125		4900			

* administrative limit service day limit defined by managers taking into account acceptable resource and social conditions

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appendix b

PRESCRIBED NATURAL FIRE PROGRAM REQUIREMENTS

Appendix B

GENERAL DESCRIPTION OF THE AREA

Defined in HUW Planning EIS Chapters I and III

FIRE HISTORY OF THE AREA, INCLUDING THE ROLE OF NATURAL FIRE

Defined in HUW Planning EIS Chapter III

GENERAL OBJECTIVES TO BE ACHIEVED BY PRESCRIBED NATURAL FIRE AND IDENTIFICATION OF ACCEPTABLE OUTCOMES

Wilderness Objective. Manage wilderness toward attaining the highest level of purity in wilderness within legal constraints. Restore fire to its near natural role and minimize impacts of human actions consistent with the safety of persons, property, and other resources.

Ecological Objective. Fire is an infrequent yet highly significant natural disturbance to the ecosystems of the High Uintas Wilderness. Therefore, the objective of the prescribed natural fire program is to allow fire to play its natural role in helping to maintain the forest ecosystem. The decision to allow a prescribed natural fire to burn will not be based upon benefits to wildlife (except Threatened or Endangered Species), maintenance of certain vegetative types, improvements in forage, or enhancement of recreational corridors. Instead, fire should define the landscape to the extent life and property are not threatened.

Fire maintains biological diversity in the High Uintas Wilderness ecosystems. Fire may occur in these ecosystems in a variety of ways ranging from low intensity, creeping ground fires to high intensity, stand replacement fires. A successful program will permit fire to operate at all levels of fire intensity, creating a mosaic of vegetative and biologic patterns.

Safety Objectives. No personal injuries to the public or firefighters.

Air Quality Objective. Consider the effects of smoke on populated areas and attempt to minimize impacts consistent with prescribed fire objectives. A natural by-product of prescribed natural fire is smoke. Continuing monitoring and evaluation of effects of smoke on areas outside of wilderness needs to be conducted to the extent described in Monitoring and Evaluation.

Recreation Objective. From areas where it is safe to camp and travel, provide opportunities for the public to observe natural processes

Commercial Use Objective. Provide outfitters and their clients opportunities to observe natural processes in areas where it is safe to camp and travel Maintain close coordination and assist affected outfitters and permittees by considering camp relocations, effects of area closures, etc to minimize financial and customer service impacts

Soil and Water Quality Objective. Allow fire to play its natural role within wilderness, while recognizing its impacts on non-wilderness soil, water, and fisheries resources Utilize the wilderness as a laboratory to help understand the processes of fire on soil and water resources

Resource and Social Impacts Objective. Protect life and property

Fish and Wildlife Objective. Fire operating as a natural process will help sustain the biodiversity of the plant communities and the fisheries and wildlife populations within the wilderness In this long-term process, there may be short-term impacts on fisheries habitat

Wildfire Suppression Objective. Suppression efforts need to protect the integrity of the wilderness and not cause undue suppression damage The primary objective for suppression in wilderness will be to take appropriate suppression response, which results in the "least cost plus loss," while still meeting land management objectives Utilize the Minimum Impact Suppression Tactics (MIST) to minimize the effects of suppression and to address the safety of firefighters

SKILLS, QUALIFICATIONS, AND ORGANIZATION NECESSARY TO IMPLEMENT AND MANAGE THE PRESCRIBED NATURAL FIRE PROGRAM

At the Northern Utah Ecogroup level (Ashley, Wasatch-Cache, and Uinta National Forests), sufficient skills need to be maintained to direct and have backup capability to implement prescribed natural fire programs in the wilderness, possibly simultaneously Fire Behavior Analyst skills in particular need to be maintained so that some backup is available collectively on the Ashley, Wasatch-Cache, and Uinta National Forests The forests in Northern Utah recognize the need to have three fire behavior analysts to fully implement the prescribed natural fire program The Forest Prescribed Natural Fire Coordinators (Ashley Forest Fire Management Officer and the Wasatch-Cache Fire Staff) are responsible for tracking the overall program on their respective forests, coordinating training, and validating results Designated PNF managers, as authorized by their respective line officers, will be responsible for carrying out operational elements of the program

Personnel Skills and Qualifications. Individuals involved in the decision making process, prescribed natural fire plan, and daily revalidation should have completed the following training, on-the-job experience or qualifications

Line Officers (District Rangers and Forest Supervisors)

- Attend Fire Management for Line Officers
- Attend Prescribed Natural Fire
- Management Participate in one prescribed natural fire evaluation

Prescribed Fire Manager

- Attend Prescribed Natural Fire Management
- Knowledge and experience with wilderness resources
- Meet the standards identified in FSM 5144
- Knowledge and experience with Intermountain ecosystems
- Participate in one prescribed natural fire evaluation
- Be available throughout the duration of an active prescribed natural fire

Specialists

- Depending on the fire situation and decision level, specialists that are likely to be consulted include

Wilderness Specialist
Fire Behavior Analyst
Public Information Officer
Archaeologist
Hydrologist
Range Conservationist
Soil Scientist
Fisheries Biologist
Fire Operations Specialist
(Division/Group Supervisor Qualified)

In addition to their specific training in field of expertise, these specialists should have the following training and experience

- Familiarity with wilderness laws and philosophy
- Attend Prescribed Natural Fire
- Management or have participated in one prescribed natural fire evaluation
- Meet appropriate Regional qualification standards

Tactical Team Leader and appropriate team members are responsible for executing any necessary holding action Qualifications and composition of the Tactical Team will be determined by the prescribed natural fire manager

GENERAL FUNDING REQUIREMENTS

The annual amounts and sources of funds allotted to manage the prescribed natural fire program will be determined by the Regional Office, Aviation and Fire Management Staff

These funds will be held in a Regional Office reserve account and distributed as needed to individual Forests. The principal contributors at this time are Aviation and Fire Management, Wilderness Recreation, Lands, Wildlife and Fisheries. Any funds currently remaining at the end of a fiscal year may be carried over to the next year's reserve account.

Before any prescribed natural fire can be allowed to burn, there must be adequate funds available to cover the anticipated costs as estimated in the prescribed natural fire burn plan. Once all available project funds have been committed to existing prescribed natural fire burn plans by the Regional Office, subsequent starts will be ineligible for prescribed fire status. The Regional fund may not be over obligated to finance additional new starts. However, the Ashley or Wasatch-Cache National Forests may also choose to expend their own program funds for the prescribed natural fire program if Regional funds are not available.

Funds will not all be committed to one wilderness complex. The number of years in a decade in which program objectives are likely to be achieved will also be considered in the allocation process. This may require extinguishing fires in areas that have frequent fires in order to allow prescribed natural fires in areas where they occur less frequently and later in the year. Managers at both the Regional and Forest levels must decide which fires best meet wilderness objectives considering the effective use of existing funds.

INTERAGENCY AND INTRA AGENCY COORDINATION

Coordination between the Ashley and the Wasatch-Cache National Forests. Since the Ashley and Wasatch-Cache National Forests share the management of the High Uintas Wilderness, it is essential the two Forests coordinate the prescribed natural fire program. Management of all PNF fires must be consistent between the two forests thereby maintaining the credibility of the program.

The Forests, in coordination with the Regional Office, are responsible to:

Evaluate fires with the potential to burn across forest boundaries and determine if they will remain in prescription when they cross the boundary. Crossing the forest boundary from one forest to another, such as from the Ashley to the Wasatch-Cache, will not be reason in itself to declare a prescribed natural fire out of prescription. The maximum allowable perimeter established for the fore could include the other forest and be coordinated with the Wasatch-Cache National Forest.

Coordination Between Administrative Units. The Ashley and Wasatch-Cache National Forests are responsible to:

Utilize the established Data General (DG) or IBM networking systems and one-to-one contacts as needed to disseminate information pertaining to prescribed natural fires and wildfires. It is particularly important that this information be relayed to all Ashley, Wasatch-Cache, and Uinta National Forest units. This will allow decision-makers to

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assess the prescribed and wildfire loads at any given time. It would also aid in the initial stages of the prescribed natural fire assessment process by providing information necessary to evaluate the cumulative effects of a decision (i.e., smoke, unit and/or forest/wilderness boundaries, etc.) on adjacent and/or downwind forests or other impact areas (i.e., communities, private property, etc.). Both the Ashley and Wasatch-Cache National Forests will also coordinate as necessary with the Utah Department of Health and Utah Forestry, Fire and State Lands Division, principally on smoke management concerns. To provide continuity in reporting wilderness fires, the following Wilderness Fire Situation Report format will be used for the electronic distribution of information.

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WILDERNESS FIRE SITUATION REPORT

Forest _____ Wilderness _____
Date _____ Time _____
S O Number _____ Fire Name _____
Fire Start Date _____ Location _____
Fuel Type _____ Status (Rx/Wild) _____
Three Day Potential _____

Fire Activity Remarks _____

INFORM AND INVOLVE PLAN

To assist public understanding and to gain the level of support and acceptance necessary to establish and maintain a successful prescribed natural fire program, this Inform and Involve Plan has been developed.

Action strategies are divided into four categories

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PLAN DEVELOPMENT AND IMPLEMENTATION

Table A-1. Those strategies that occurred during the Plan development and implementation, and subsequent changes. The primary thrust of this phase is education.

Action Item	Who	When
Develop presentations for in-house and public meetings on plan development and final plan content; develop follow-up presentations after plan implementation	Working Team, Forest FMO, Fire Staff, District FMOs, Forest PAOs	Before and after final plan approval
Develop presentations for the public to educate them on prescribed natural fire in the High Uintas Wilderness	Forest FMO, Fire Staff, District FMOs, Forest PAO	On-going after final plan approval
Prepare and distribute media release on plan development and implementation and any major revision	Forest FMO, Fire Staff, District FMOs, Forest PAO	Before and final plan approval

ANNUAL FIRE SEASON INVOLVEMENT

Table A-2. Those communication strategies that occur pre-season, to disseminate information to adjacent forests and wilderness users.

Action Items	Who	When
Keep appropriate line officer(s) briefed on current and expected	Prescribed Fire Management Officer	At initial fire start, then as needed or
Post "FIRE CAUTION" signs at appropriate wilderness portals. Coordinate with adjacent Forests and Districts	Prescribed Fire Management Officer, District Ranger, District Resource Managers, District FMOs	When a prescribed natural fire and or wildfire is burning in the area
Determine need for fire closure. Prepare special orders as appropriate	Forest Supervisor, District Ranger, Prescribed Fire Management Officer, District Resource Assistant	Determined by current and expected fire status
Post "FIRE CAUTION" signs at appropriate wilderness portals and offices. Coordinate with adjacent Forest and Districts, and Notify media	Prescribed Fire Management Officer, District Ranger, District Resource Assistant, Forest PAO	Whenever closure is put into effect for area, trail and or road
Keep appropriate political contacts (Federal, State, Tribal and Local) appraised of current and expected prescribed natural and or wildfire status	Regional Office, Forest Supervisors, Forest Fire Staff, Forest FMO, District Rangers, Prescribed Fire Manager, Forest PAO	As appropriate based on National, Regional, and local fire situation
Keep appropriate in-service personnel (wilderness rangers, clerks, etc.) briefed on status of wilderness fire situation	District Ranger Staff, Prescribed Fire Management Officer, Resource Officer	As fire status changes
Keep appropriate out-service personnel (visitors, outfitters, local communities, landowners, etc.) Briefed on wilderness fire situation	Forest Supervisors, Fire Staff, Forest FMO, District Rangers, Prescribed Fire Management Officer	As fire status changes

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PRESCRIBE NATURAL FIRE AND/OR LARGE WILDFIRE BURNING

Table A-3. Those strategies planned for the times when a prescribed natural fore and/or large wildfire is burning. The primary thrust of this phase is information dissemination

Action Item	Who	When
Prepare news releases for local, Regional and National news media as appropriate	Prescribed Fire Management Officer, Forest Fire Staff, Forest PAO	As initial fire(s) start, then as needed or requested

POST SEASON

Table A-4. Those strategies planned for post-season information gathering and dissemination needs

Action Item	Who	When
Prepare news articles at the end of the fire season summarizing the past season's fire activity	Forest FMO, Forest Fire Staff, District FMOs, Forest PAO, Wilderness Manager	November of each year if there were fires that
Discuss prescribed natural fore program at annual coordination meeting of High Uintas Wilderness managers	District Staff, Forest FMO, Forest Fire Staff, Wilderness Rangers	Annually
Ensure temporary special orders have been rescinded and signs and posted orders removed from trailheads	District Staff	Each fall prior to hunting season or as soon as special orders are rescinded if in effect during hunting season
Distribute results of monitoring and evaluation via media release	Forest PAO	Annually
Include monitoring and evaluation results in Forest's Annual Monitoring and Evaluation Report and High Uintas Wilderness Report	Forest Prescribed Natural Fire Coordinator, District FMOs	Annually

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POTENTIAL IMPACTS OF PRESCRIBED FIRE PLAN IMPLEMENTATION

This Environmental Impact Statement for prescribed fire in the High Uintas Wilderness recognizes both positive and negative effects inside and outside the wilderness as a result of prescribed natural fire. It is an amendment to the Ashley National Forest Plan and the Wasatch-Cache National Forest Plan.

Within the High Uintas Wilderness during the last 23 years (1974 - 1996), there have been 64 person-caused fires that have burned approximately 146.1 acres, for an average of 2.8 fires and 6.4 acres per year. Lightning-caused fires over the same period of time, have numbered 19 fires that burned approximately 2988.7 acres.

There is physical (fire scars) and documented (Graham Journal, 1871) evidence that there were wide spread fires in the High Uintas during the latter part of the 1800s. The next occurrence of a significant fire in the High Uintas was the person- caused Swift Creek Fire on the Roosevelt R.D. on July 20, 1931, which burned 2,085 acres. The most recent large fire in the wilderness was the lightning-caused Squaw Basin Fire on the Duchesne R.D. on June 24, 1974, which burned 2,910 acres. Obviously, there are historically many years (60 - 40) between large fires in the High Uintas. Given the predominant vegetation types (lodgepole pine, Engelmann Spruce, and subalpine fir), this is not surprising and very predictable.

The anticipated average annual burned area, from implementation of the prescribed natural fire policy in the High Uintas Wilderness, is from 200 to 300 acres per year. This is slightly more than the previous average annual acres for lightning-caused fires (129.9 acres/year) due to the fact that a high percentage of the natural-caused fires will be managed as PNFs.

Fire suppression, which began in earnest around the turn of the century, has had some influence on the number of large fire in the High Uintas. It has not totally excluded fires effects in the High Uintas Wilderness, but it has effectively altered them. The most significant impact of implementing the PNF program will be to allow fire to play a more natural role in the wilderness, resulting in long-term fire effects being more compatible with wilderness resource objectives.

The most significant effect is the creation of vegetative diversity and the reduction in large areas of heavier than normal fuel accumulations. These Mosaics of diverse vegetation and lower fuel loadings reduce the potential for catastrophic wildfires. Fuel conditions and/or types will become more heterogeneous, creating areas with pockets of dissimilar fire behavior characteristics that buffer potentially damaging effects of a fire.

Fire will become more of a driving force in the process of nutrient recycling. This stimulates the production and maintenance of vegetative diversity within the various fire mosaics. These conditions will enhance the establishment of a diversity of habitats capable of supporting a variety and quantity of wildlife species. Wilderness users will observe and experience the short and long-term effects created by fires burning in a natural environment.

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There are two known historical structures The Lodgepole Lake Historic Cabin is located in the northwest 1/4 of the northeast 1/4 of Section 4 in township 2 north and Range 8 west, on the U S G S Grandaddy Basin quad The Garfield Basin Salt House is located in the southwest 1/4 of the northwest 1/4 of Section 21 in Township 4 north and Range 5 west, on U S G S Garfield Basin quad Both structures are located at very high elevations and are not located where high intensity stand replacement fires have spread It will not be difficult to protect these structures from fire If any prehistoric or historic Cultural Resources should be discovered during any PNF monitoring or fire suppression activities, the Ashley or Wasatch-Cache National Forest Archeologist should be contacted

Since the Endangered Species Act and the Wilderness Act may have overlapping authority, the intent of both need to be met at this time Presently there are no known threatened and endangered plants or animals identified in the High Uintas Wilderness There are some sensitive alpine plants that have been found at the higher elevations However, they are located on rocky, barren sites that are not threatened by fire If a threatened or endangered plant or animal is identified a biological evaluation will be conducted That evaluation will provide mitigative actions for protection of the plant or animal from unusual effects of fire, if necessary

The greatest threats to private or state lands from fire is at two places along the northern boarder of the High Uintas Wilderness boundary on the Wasatch-Cache National Forest The first location is along the northwest boarder at Cataract Creek (Section 3, T 1N , R 11E , SLBM) where the wilderness boundary is slightly over one mile southwest of state land The second location is along the northeast border at Beaver Creek (Section 1, T 2N , R 16E , SLBM) where the wilderness boundary is one mile south of state and private land These properties are very close to the wilderness boundary and the need to protect them is a conflict that will require quality decisions and good foresight The direction for the Forest Service to protect life and property is quite clear, and will have the potential to limit the number of prescribed natural fire opportunities in those areas

A possible impact is the direct loss of revenue to commercial outfitters caused by active fires, or indirect of future revenue losses from extensive fire damage to authorized areas, or public perception of danger Fire is a risk of operating in wilderness, but close communication, coordination and cooperation as detailed in the PNF management plan should help mitigate adverse impacts on outfitters and other recreation service partners

A natural by-product of prescribed natural fire is smoke Smoke impacts from prescribed natural fire on downwind communities and wilderness users will be reviewed in the monitoring and evaluation process Under the 1977 Clean Air Act amendments, the High Uintas wilderness is designated as a Class II airshed

The process that will be described in the High Uintas Wilderness Prescribed Natural Fire Management Plan will be designed to inform the decision-making official of the

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Table A-6. Total Downed Woody Fuel Loading

Sample Area	Number of Sample Stands	Tons/Acre
Evanston R D , Wasatch-Cache N F	1	11
Mtn View R D Wasatch-Cache N F	8	11
Duchesne R D , Ashley N F	4	14

The data indicates that over much of the High Uintas Wilderness the fuel loading at the present time has not reached critical levels This is due in part to the fact that much of the forested areas of the High Uintas Wilderness have burned in the past 100 to 120 years Also, the lodgepole pine and spruce/fir forests experience extremely slow growth rates due to the high elevations Consequently, no areas inside or immediately outside the High Uintas Wilderness are in need of fuel treatment measures at this time

The two known historical structures previously mentioned (Lodgepole Lake Historic Cabin and Garfield Basin Salt House) are the only developments in the Wilderness that could need protection from fire

Presuppression is planning and/or work accomplished in advance of planned or unplanned fire occurrence The goals of presuppression planning are

- Protection of identified areas, structures, and administrative sites
- Improved effectiveness of fire suppression activities
- Indirectly increased opportunities for fire to play its natural role In the case of prescribed natural fire, presuppression actions will be limited to identifying areas or developments needing protection from fire, and the most likely means of protecting them

In the event of a prescribed natural fire, protection of these areas and improvements can occur at any time during the fire Use of burning out, foam, pumps, and retardant could all be considered on a case-by-case basis using a minimum tool concept

It is the responsibility of each District Ranger or Forest Wilderness Manager to identify, prioritize, and schedule treatments for the areas that need to be protected or treated The actions are to be incorporated into the Ashley National Forest or Wasatch-Cache National Forest Fire Management Action Plan The Forest FMO or Fire Staff respectively will assist in this endeavor where fire behavior expertise is required and will have the responsibility to implement any plans developed

In addition to historic sites, there are several pack bridges within the wilderness which need to be protected from fire (see trail maintenance plan for locations of bridges) Methods to protect these bridges would include using fire, hose lays, or sprinkler systems

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risk that natural ignition could go out of prescription Consequences of this happening include a fire exceeding predetermined allowable boundaries, unacceptable smoke, threat to public safety of property, or resource damage The Stage 1 (2 hour) and Stage 2 (72 hour) analysis, coupled with continual monitoring of site specific conditions, are designated to minimize the risk of a fire going out of prescription

IDENTIFICATION OF FUEL TREATMENT MEASURES NEEDED TO REDUCE HAZARD FUELS IN SUPPORT OF THE PNF PROGRAM, INCLUDING IDENTIFICATION OF AREAS OR DEVELOPMENTS THAT NEED PROTECTION FROM FIRE

The objective of any fuel treatment measures would be directed toward protecting private property, administrative sites and facilities, or to lessen the probability of a fire escaping the wilderness Fuel treatment measures that may be used to reduce the risk to these areas include

- Use planned ignitions and/or mechanical fuel manipulation outside the wilderness boundary, as specified in FSM 2324

- Use planned ignitions inside the wilderness boundary where wilderness management objectives and conditions are met

- Use non-mechanical fuel manipulations or planned ignitions to reduce the risk in close proximity of identified administrative facilities or historic sites within the wilderness

The objective of these actions is to increase the probability of success of the program and reduce the threat of escape from the area or significant damage to capital investments

As described by Aldrich and Mutch (1973), downed woody fuel loading is divided into two classes small fuels, those less that three inches in diameter, and large fuels, those over three inches in diameter A reconnaissance level fuels inventory was done in the High Uintas Wilderness area during the mid-70s which gives a broad picture of the fuels situation Table A-5 indicates the loading of small fuels (less than three inches in diameter) on 117 plots on the south slope of the High Uintas Wilderness

Table A-5. Small Downed Woody Fuel Loading

Fuel Loading (tons/acre)	Loading Class	Percent of Plots
0 - 2	Light	33 %
2 - 5	Medium	39 %
5 -	Heavy	28 %

Seventy-two percent of the plots had loadings of small fuels (less than three inches in diameter) in the light to medium loading class with only 28% of the plots in the heavy loading class of greater than five tons/acre

Table A-6 shows total downed woody fuel loading (less than three inches in diameter and greater than 3 inches in diameter) at plots located around the High Uintas Wilderness which were sampled in the past 10 years

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actions that could have been taken to reduce the impacts

Recreation Objective. From areas where it is safe to camp and travel, provide opportunities for the public to observe natural processes

Monitoring and Evaluation Criteria. Describe how and why access was limited by prescribed natural fire

Commercial Use Objective. Provide outfitters and their clients opportunities to observe natural processes in areas where it is safe to camp and travel Maintain close coordination and assist affected outfitters and permittees by considering camp relocations, effects of area closures, etc , to minimize financial and customer service impacts

Monitoring and Evaluation Criteria.

- Document the number and percent of outfitters in the wilderness affected by prescribed natural fire, as well as complaints or commendations received Measures of prescribed fire impact could include number of trips canceled, number of trips rescheduled, and number of trips unaffected by prescribed natural fire Evaluate the results and describe the degree of impact

- Contrast the number of outfitters and camps that were successfully relocated with those that were not successfully relocated Evaluate the results

- Evaluate the expense of the prescribed natural fire program to the affected outfitters

Soil and Water Quality Objective. Allow fire to play its natural role within wilderness, while recognizing its impacts on non-wilderness soil, water, and fisheries resources Utilize the wilderness as a laboratory to help understand the processes of fire on soil and water resources

Monitoring and Evaluation Criteria. Conduct on-site evaluation by specialists on those prescribed natural fires and wildfires considered to be of consequence by the specialists involved

Resource and Social Impacts Objective. Protect life and property

Monitoring and Evaluation Criteria. Document losses to life, property and public health resulting from the prescribed natural fire program Discuss why these losses occurred and recommend how the program can be modified to reduce the future risk of these losses

Fish and Wildlife Objective. Fire operating as a natural process will help sustain the biodiversity of the plant communities, and the fisheries and wildlife populations within the wilderness In this long-term process, there may be short-term impacts on fisheries habitat

Monitoring and Evaluation Criteria. Wildlife habitat monitoring needs will be adequately met with the ecological monitoring requirements in both the ecological and soil and water quality objectives of this appendix No additional monitoring for wildlife and fisheries is scheduled

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Wildfire Suppression Objective.
Suppression efforts protect the integrity of the wilderness and do not cause undue damage. The primary objective for suppression in wilderness is to take appropriate suppression response, which results in the "least cost plus loss," while still meeting land management objectives. Utilize the Minimum Impact Tactics (MIST) to minimize the effects of Suppression and to address the safety of firefighters.

Monitoring and Evaluation Criteria.
Document and evaluate the following items annually and compare the effects of prescribed natural fire and wildfire.

- Compare disturbances caused by camps, overflights, helispots, and other suppression activity.
- Compare amount of fireline constructed and rehabilitated.
- Compare number of aircraft landings.
- Compare program costs.
- Recommend future actions and modification to this plan which could improve the objectives of the Fire Management Plan.

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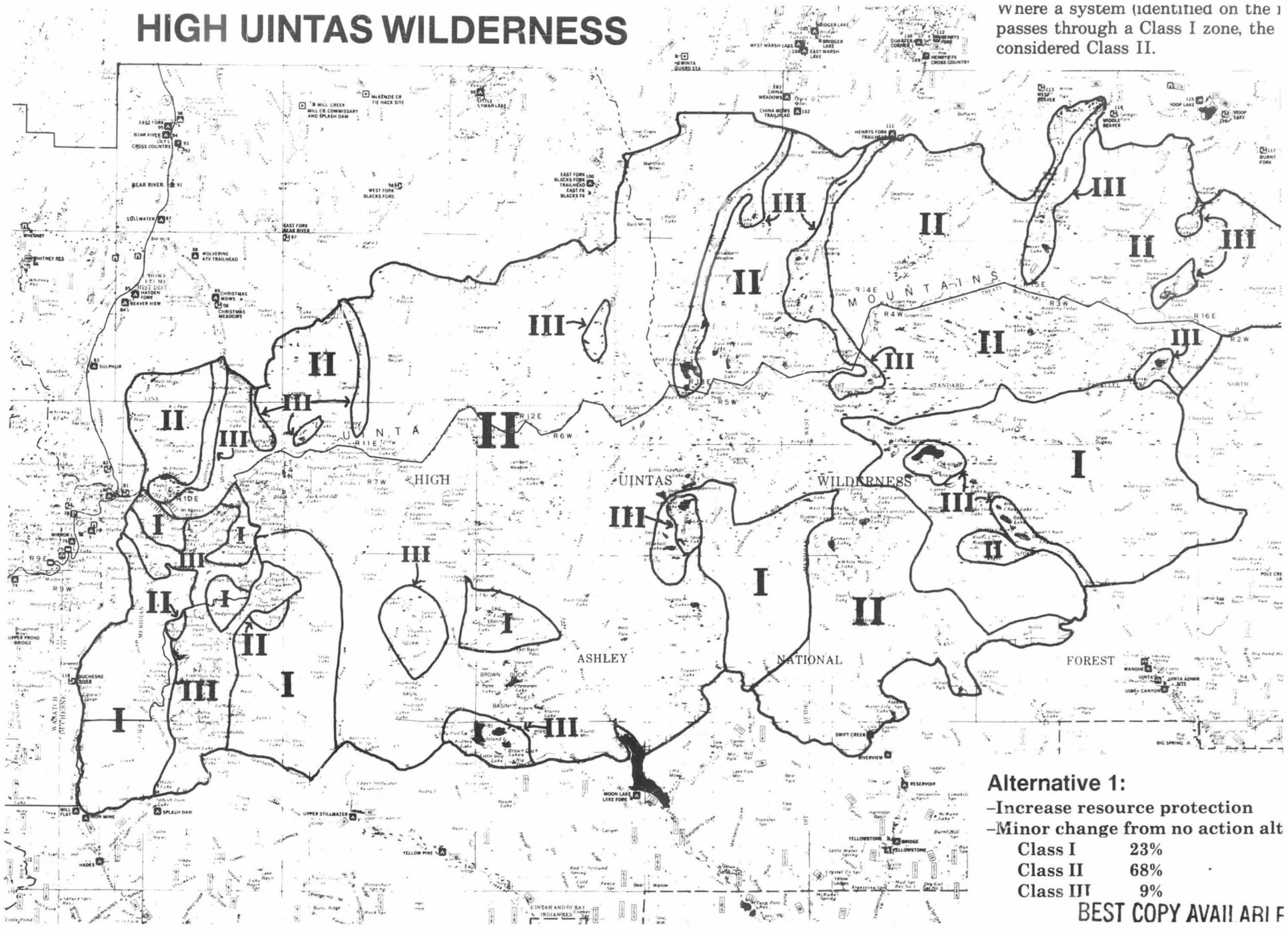
HIGH UINTAS WILDERNESS



Where a system (identified on the
passes through a Class I zone, the
considered Class II.

Alternative 1:

-Increase resource protection
-Minor change from no action alt

Class I	23%
Class II	68%
Class III	9%

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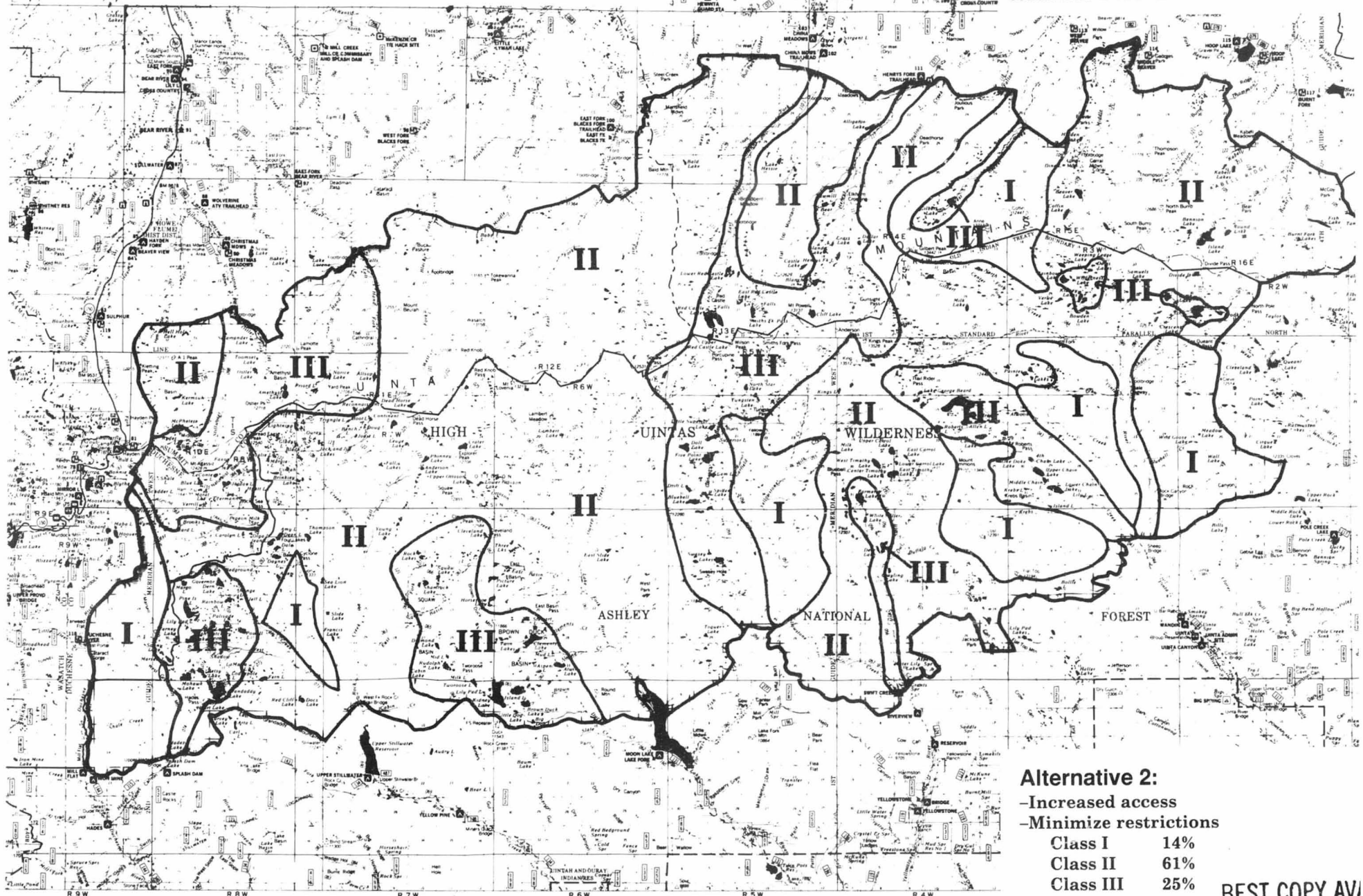
Where a system (identified on the map) tra
passes through a Class I zone, the trail is
considered Class II.



Alternative 2:

–Increased access

–Minimize restrictions

Class I	**14%**
Class II	**61%**
Class III	**25%**

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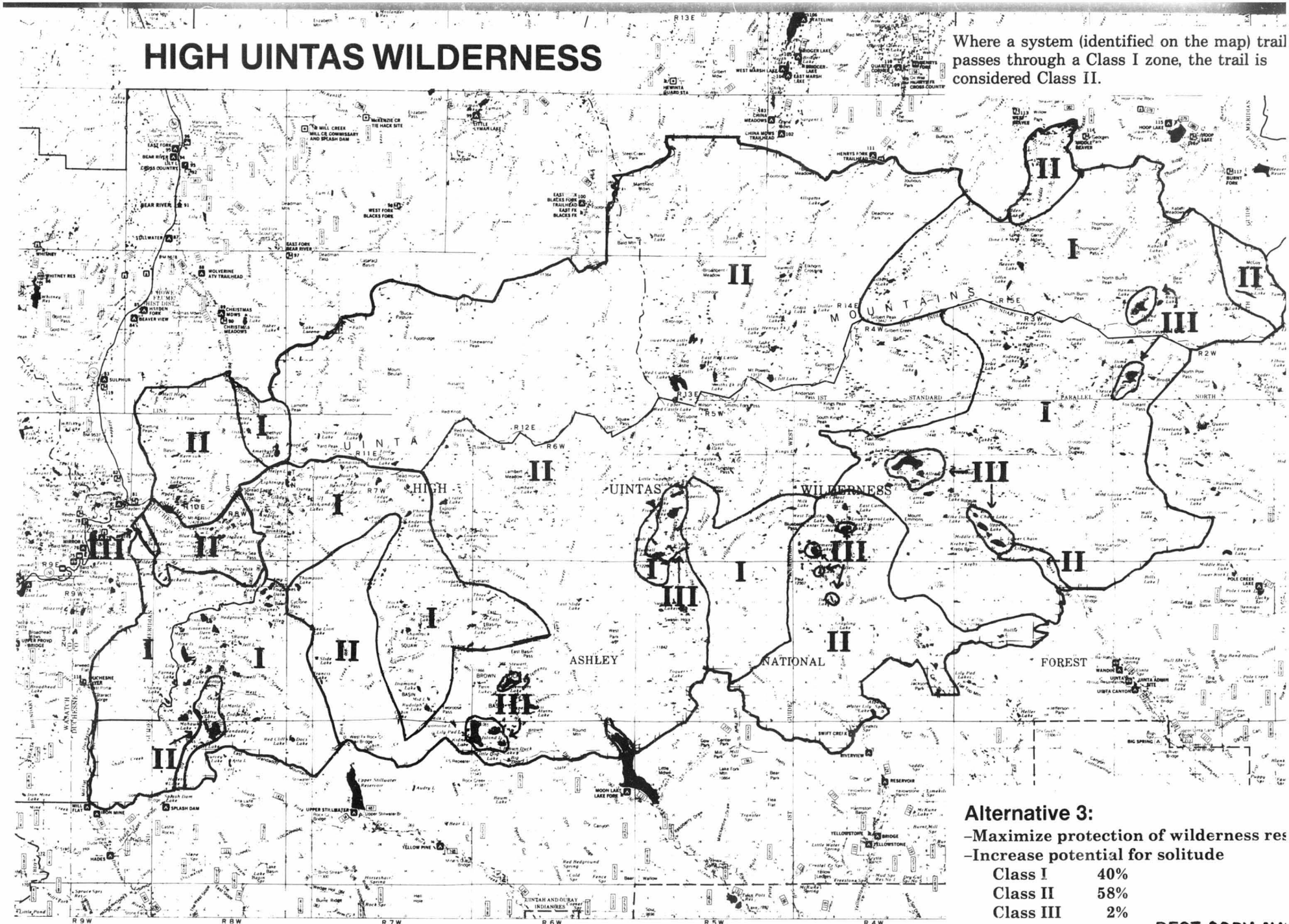

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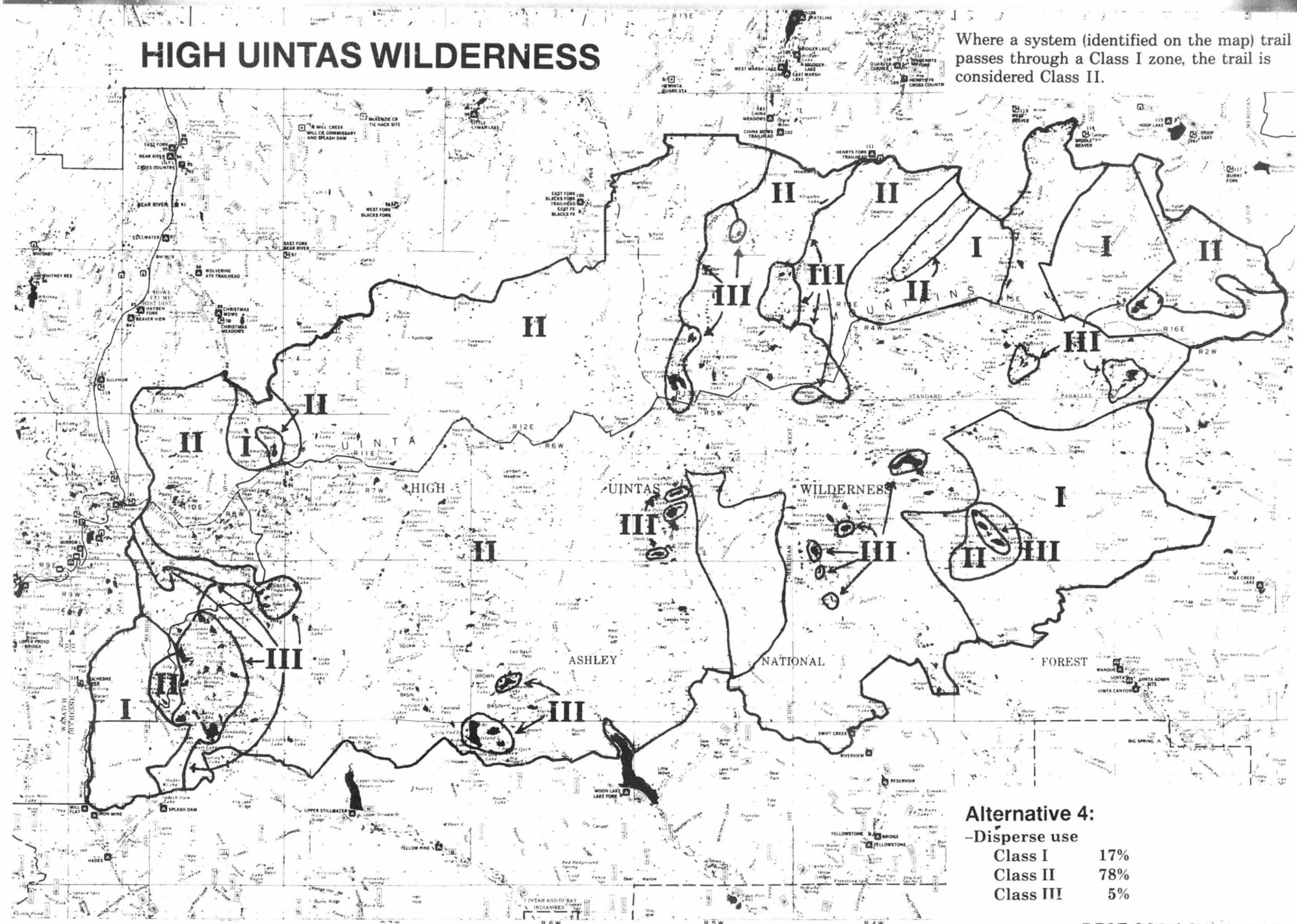
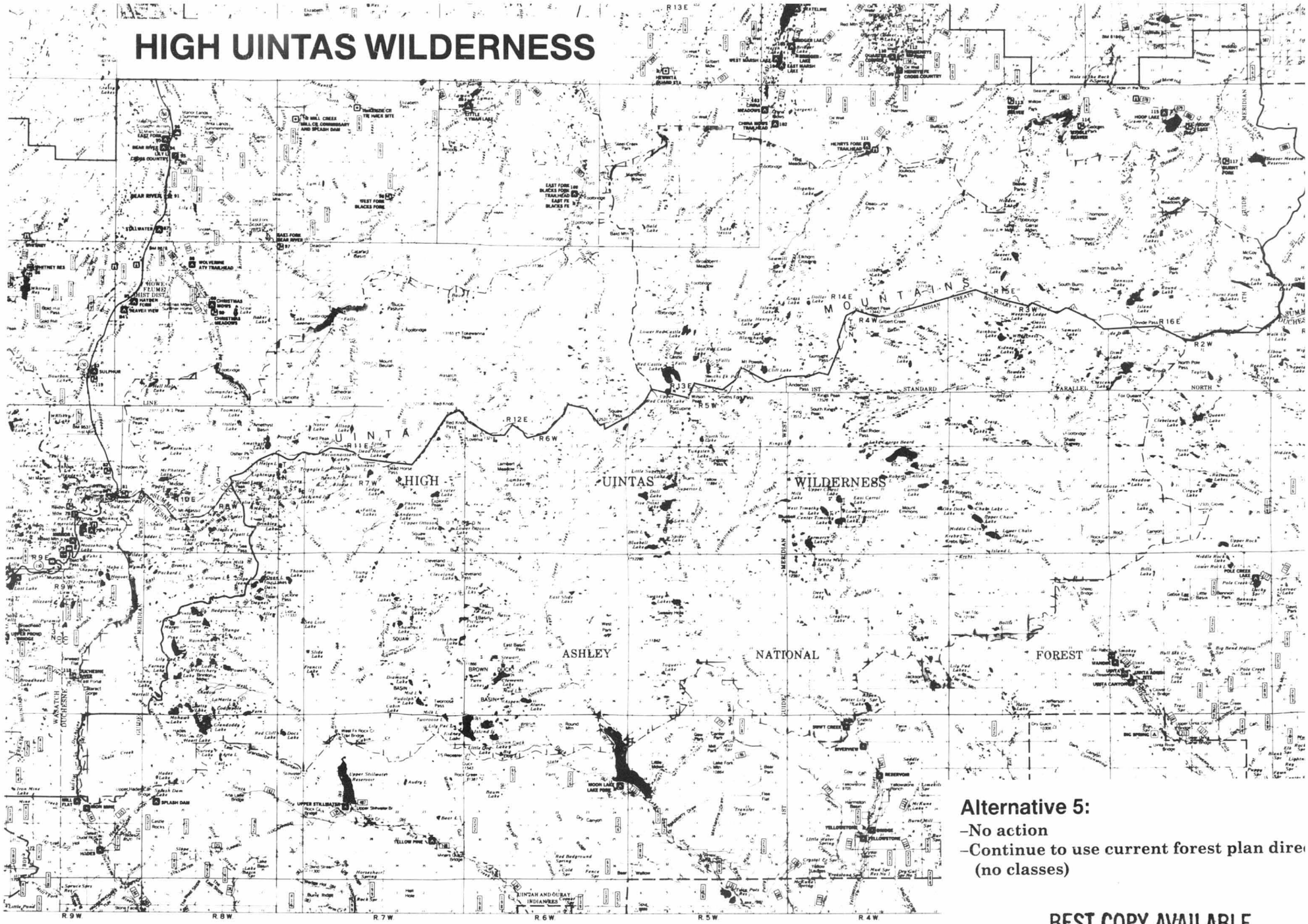
Where a system (identified on the map) trail passes through a Class I zone, the trail is considered Class II.



Alternative 4:

–Disperse use

Class I	17%
Class II	78%
Class III	5%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Alternative 5:
–No action
–Continue to use current forest plan dire
(no classes)
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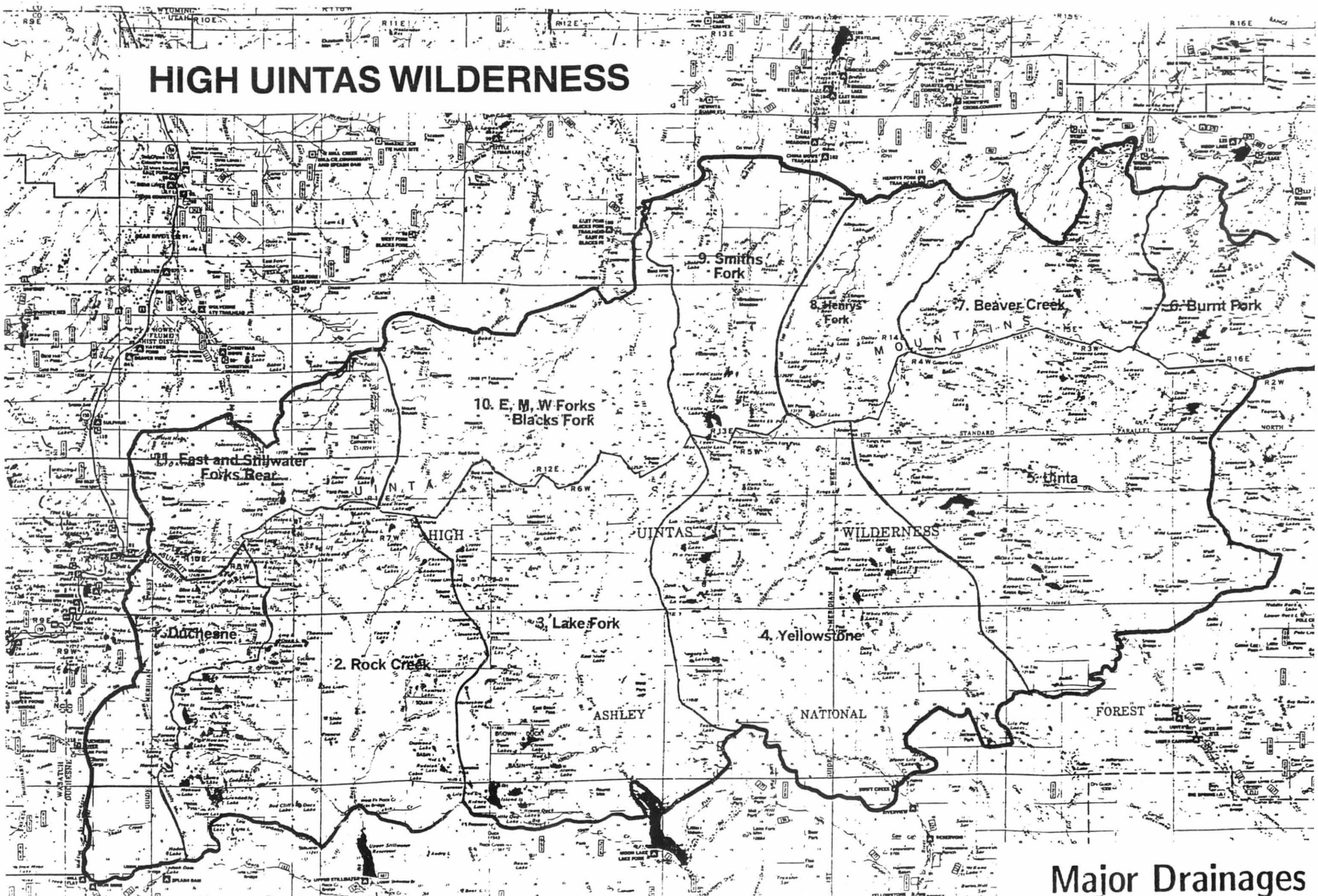

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