Final Environmental Impact Statement for Management of the High Uintas Wilderness

United States Forest Service

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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.

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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 throughout 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.


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.

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 Plan) 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...
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 are 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-establishing 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 undeveloped 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 hydrometeorological 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/Stilwater 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.

DESIRABLE 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 with 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.

DESIRABLE 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 II 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
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.

<table>
<thead>
<tr>
<th>Resource</th>
<th>Indicator</th>
<th>Standard</th>
<th>Monitoring Plan</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>Deposition</td>
<td><em>All Classes</em>: Nitrate and Sulphate loading will not exceed 3.5 kg/hectare yr and five kg/hectare yr, respectively</td>
<td>One to three deposition sites near lake sites (see monitoring sites for surface water chemistry)</td>
<td>Nitrate and sulphate can contribute to acidification and promote submerged vegetation growth, high oxygen demands and high potential for winter fish kills in high mountain lakes.</td>
</tr>
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<td></td>
<td>Standard Visual Range</td>
<td><em>All Classes</em>: 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 fire smoke will not reduce pre-activity visual range more than 20% in Class II wilderness airsheds.</td>
<td>Visual monitoring near Mill Park. Smoke emissions modeling</td>
<td>Monitoring of Standard Visual Range will allow detection of air quality impacts that threaten to be long term or permanent.</td>
</tr>
<tr>
<td></td>
<td>Surface Water Chemistry (pH, alkalinity, cations, anions)</td>
<td><em>All Classes</em>: 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 191) Section R448-2-14 2, Numeric Criteria for Wildlife</td>
<td>Monitor appropriate number of sites (presently monitoring Dean, Bluebell*, and Walk-up Lakes)</td>
<td>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.</td>
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*Ir. 1986, the Bluebell site will be replaced with a lake in the Henry's Fork drainage area on the North Slope.*
<table>
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<tr>
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<tbody>
<tr>
<td>Water Quality</td>
<td>coliform bacteria</td>
<td>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 I, Numeric Criteria for domestic, recreation and agricultural uses</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>trail placement design</td>
<td>Class I trailless</td>
<td>Class I &amp; III: Trails avoid wetlands</td>
<td>Standards adhered to during trail construction and reconstruction.</td>
<td>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.</td>
</tr>
<tr>
<td>trail switchbacks</td>
<td>Class I trailless</td>
<td>Class I &amp; III: Trail switchbacks do not show signs of short-cutting [Special Order 36 DFR 261 55(e)]</td>
<td>Field observation and incident report analysis</td>
<td>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.</td>
</tr>
<tr>
<td>camping distance from water sources</td>
<td>All Classes</td>
<td>Terrain permitting campers to be at least 200 feet from water [Special Order 36 CFR 261 58(e)]</td>
<td>Field observation and incident report analysis</td>
<td>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 maybe some place where camping close to water causes pronounced pollution. Other researchers (Taylor &amp; Erman, 1978) speculate that some subtle changes in aquatic ecosystems may be the result of recreation activities close to the lake shore.</td>
</tr>
<tr>
<td>bedding or tethering any recreation stock</td>
<td>All Classes</td>
<td>Stock cannot be tethered within 200 feet of water sources for more than two hours [Special Order 36 CFR 261 58 (aa)]</td>
<td>Field observation and incident report analysis</td>
<td></td>
</tr>
<tr>
<td>Resource</td>
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</table>
| 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. |
<p>|                |                                                                           | <strong>Class III</strong>: 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. | <strong>Class III</strong>: Monitor trend in campsite condition on one drainage (or portion of) that exceeds erosion Class I standards, at least once every 10 years. |                                                                                                       |</p>
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>Wildlife and Fisheries</td>
<td>Bank erosion (for aquatic habitat)</td>
<td>No standard (baseline inventory has not been completed)</td>
<td>Monitoring plan</td>
<td>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</td>
</tr>
<tr>
<td></td>
<td>Neotropical birds</td>
<td>No standard (baseline inventory has not been completed)</td>
<td>No monitoring plan</td>
<td>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</td>
</tr>
<tr>
<td></td>
<td>Habitat available for US Fish and Wildlife Service listed threatened or</td>
<td>No standard (baseline inventory has not been completed)</td>
<td>No monitoring plan</td>
<td>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</td>
</tr>
<tr>
<td></td>
<td>endangered (1E) species (none as of 1/96) and Forest Service</td>
<td>All Classes: Once inventories are complete, a specific population number and species diversity will be the standard</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>sensitive (S) species</td>
<td>All Classes: Once inventories are complete, a specific acreage of habitat available will be the standard</td>
<td></td>
<td></td>
</tr>
<tr>
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<tr>
<td>Vegetation</td>
<td>Habitat available for US Fish and Wildlife Service listed threatened or endangered (TF) plant species (none as of 1996) and Forest Service sensitive (S) species</td>
<td>No more than 10% of habitat for sensitive species: Papaver radicatum var. Pygmaeaum and Draba densifolia var. Asculata are not adversely altered by human uses</td>
<td>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.</td>
<td>These plants reside on talus slopes at very high elevations. The potential for habitat alteration by human uses is very low.</td>
</tr>
<tr>
<td></td>
<td>Alpine vegetation types slopes - 10%, potential ground cover</td>
<td>All Classes 85% of potential</td>
<td>Ground cover measurements taken at selected sites. These will reflect various uses 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.</td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>Alpine types slopes - 10%, potential ground cover</td>
<td>All Classes 85% of potential</td>
<td></td>
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<tr>
<td></td>
<td>Aspen types potential ground cover</td>
<td>All Classes 85% of potential</td>
<td></td>
<td></td>
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<td></td>
<td>Riparian types (away from greenline), potential ground cover</td>
<td>All Classes 85% of potential</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Riparian types (greenline*) stream bank stability</td>
<td>All Classes 85% of potential (standard criteria in &quot;Integrated Riparian Evaluation Guide&quot;)</td>
<td>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.</td>
<td>For stream types where vegetation has a strong stream bank controlling influence (F and others), the greenline is an indicator of resource value for fish habitat and other stream functions.</td>
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<tr>
<td></td>
<td>Natural fire regime</td>
<td>All Classes 100% of prescribed fires (PF) are managed so fire can play, as nearly as possible, its natural role in the ecosystem</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>Resource</td>
<td>Indicator</td>
<td>Standard</td>
<td>Monitoring Plan</td>
<td>Rationale</td>
</tr>
<tr>
<td>----------</td>
<td>-----------</td>
<td>----------</td>
<td>----------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Vegetation</td>
<td>Tethering stock directly to a tree [Special Order CFR 261 52 (a)]</td>
<td>All Classes: Over two hours or sooner if damage to the tree or vegetation at the base of the tree is occurring</td>
<td>Field observation and incident report analysis</td>
<td>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)</td>
</tr>
<tr>
<td></td>
<td>Overnight use or grazing by recreational stock [Special Order 36 CFR 261 57 (c)]</td>
<td>No overnight use or grazing by rec stock in Chain Lakes basin (Uinta drainage)</td>
<td>Field observation and incident report analysis</td>
<td>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)</td>
</tr>
<tr>
<td>Resource</td>
<td>Indicator</td>
<td>Standard</td>
<td>Monitoring Plan</td>
<td>Rationale</td>
</tr>
<tr>
<td>-----------------------</td>
<td>----------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Recreation</td>
<td>Litter human waste</td>
<td>All Classes: Disposing of litter or waste in an inappropriate way.</td>
<td>Field observation and incident report analysis.</td>
<td>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)</td>
</tr>
<tr>
<td>Campsite density</td>
<td>(distance between occupied campsites)</td>
<td>Class I: 80% probability occupied campsites are one mile apart</td>
<td>Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years</td>
<td>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 III areas. Proximity of occupied campsites to each other is a tangible measure and indicator of solitude.</td>
</tr>
<tr>
<td>Campsite density</td>
<td>(distance between occupied campsites)</td>
<td>Class II: 80% probability occupied campsites are 1/4 mile apart</td>
<td>Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years</td>
<td></td>
</tr>
<tr>
<td>Campsite density</td>
<td>(distance between occupied campsites)</td>
<td>Class III: 80% probability occupied campsites are 200 feet apart</td>
<td>Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years</td>
<td></td>
</tr>
<tr>
<td>Campsite assessment</td>
<td>rating (modified from campsite assessment rating David Cole defined in 1988)</td>
<td>Class I: 0% campsites have an SII rating greater than 40</td>
<td>Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years</td>
<td>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.</td>
</tr>
<tr>
<td>Campsite density</td>
<td>(distance between occupied campsites)</td>
<td>Class II: 10% or fewer campsites have an SII rating greater than or equal to 50</td>
<td>Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years</td>
<td></td>
</tr>
<tr>
<td>Campsite density</td>
<td>(distance between occupied campsites)</td>
<td>Class III: 20% or fewer campsites have an SII rating greater than or equal to 50</td>
<td>Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years</td>
<td></td>
</tr>
<tr>
<td>Group size</td>
<td>Class I: seven people seven stock</td>
<td>Field observation and registration card analysis.</td>
<td>Field observation and registration card analysis.</td>
<td>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.</td>
</tr>
<tr>
<td>Length of stay at one</td>
<td>Class I: 1-2 nights maximum recommended overnight stay</td>
<td>Field observation and incident report analysis.</td>
<td>Field observation and incident report analysis.</td>
<td>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.</td>
</tr>
<tr>
<td>Campsite density</td>
<td>(distance between occupied campsites)</td>
<td>Class II &amp; III: 14 nights at an individual site [Special Order 36 CFR 261.58 (a)]</td>
<td>Field observation and incident report analysis.</td>
<td>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.</td>
</tr>
<tr>
<td>Resource</td>
<td>Indicator</td>
<td>Standard</td>
<td>Monitoring Plan</td>
<td>Rationale</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Recreation</td>
<td>Firewood availability: dead wood debris in sizes: class 0 25-4.0 inches</td>
<td>&quot;Abundant&quot; campfire wood any activity area greater than or equal to seven</td>
<td>Data is collected in activity areas along random transects to measure quantity of</td>
<td>Abundant quantities of dead wood debris are available for campfires while still</td>
</tr>
<tr>
<td></td>
<td>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</td>
<td>tons/acre will be open to campfire wood gathering and campfires will be</td>
<td>wood available (tons/acre) for campfires and nutrient cycling. Comparable unused</td>
<td>providing the size classes of wood most important for nutrient cycling within the</td>
</tr>
<tr>
<td></td>
<td></td>
<td>allowed regardless of intensity of recreational use (standard will be</td>
<td>unused areas (same species elevation slope aspect) will be sampled to determine the</td>
<td>ecosystem. Cutting down live trees and hacking up dead standing trees occurs only</td>
</tr>
<tr>
<td></td>
<td></td>
<td>determined after baseline data is collected in 1996)</td>
<td>amount of wood potentially available for campfires. Data transects will be in</td>
<td>rarely because downed wood is available. No restrictions on campfire use necessary.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>campfire activity areas and within 200' of at least one typical campsite. * The</td>
<td>Classes I-III. Visitor use level should not effect availability of small woody debris</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>data collected will be evaluated to determine the proportion of potentially</td>
<td>(twigs-4&quot; branches) for nutrient cycling and campfires.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>available wood (control sites) and actually available wood (activity areas) and a</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>standard developed in tons per acre to allocate amount of woody debris available</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>for campfire wood collection (in relation to amount left for nutrient cycling).</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The amount of woody debris available for campfires will be evaluated utilizing the</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>methodology described in handbook for Inventorying Downed and Woody Material</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>(Brown)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Scarcity to no less than or equal to seven tons/acre (standard will be determined</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>after baseline data is collected in 1996)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Class I, II &amp; III. Wood gathering and campfires prohibited within 1.4 mile of any</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>activity area where standard is exceeded</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>incorrect to no more than or equal to seven tons/acre (standard will be determined</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>after baseline data is collected in 1996)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Class I, II &amp; III. Wood gathering and campfires prohibited within 1.4 mile of any</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>activity area where standard is exceeded</td>
<td></td>
</tr>
</tbody>
</table>

Summary:
<table>
<thead>
<tr>
<th>Resource</th>
<th>Indicator</th>
<th>Standard</th>
<th>Monitoring Plan</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recreation</td>
<td>Campfires</td>
<td>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)]</td>
<td>Field observation and incident report analysis</td>
<td>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).</td>
</tr>
<tr>
<td>Outfitting guiding permits</td>
<td>Stock 7*</td>
<td>Administration of permits</td>
<td></td>
<td>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.</td>
</tr>
<tr>
<td>Outfitting guiding service days stock use</td>
<td>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</td>
<td>Monitor operating plans and actual use reports.</td>
<td></td>
<td>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).</td>
</tr>
<tr>
<td>Outfitting guiding service days non-stock use outfitters</td>
<td>Each alternative defines maximum authorized service days available by drainage (see description of alternatives Chapter II)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Outfitting guiding type camps</td>
<td>Class I: Drop camps only, no spike or assigned camps. Over nigh group size limited to seven people and or seven stock</td>
<td></td>
<td></td>
<td>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.)</td>
</tr>
</tbody>
</table>
HIGH UINTAS WILDERNESS EXISTING CONDITIONS (1994)

South Slope

<table>
<thead>
<tr>
<th>DUCHARNE RIVER</th>
<th>ROCK CREEK</th>
<th>LAKE FORK</th>
<th>YELLOWSTONE &amp; SWIFT CREEKS</th>
<th>UINTA CANYON</th>
</tr>
</thead>
<tbody>
<tr>
<td>hectares (acres)</td>
<td>9200 (&lt; 25,000)</td>
<td>28,520 (2)</td>
<td>25,925 (3)</td>
<td>28,911 (72,452)</td>
</tr>
<tr>
<td>counties</td>
<td>Summit</td>
<td>Duchesne</td>
<td>Duchesne</td>
<td>Duchesne</td>
</tr>
<tr>
<td>type visitor</td>
<td>urban</td>
<td>urban</td>
<td>rural</td>
<td>rural</td>
</tr>
<tr>
<td>visitor days (approx)</td>
<td>14,000</td>
<td>13,000</td>
<td>13,000</td>
<td>14,000</td>
</tr>
<tr>
<td>visitor attractions</td>
<td>easy access, lakes</td>
<td>50-mile bike, lakes</td>
<td>Kings Peak lakes</td>
<td>Kings Peak lakes</td>
</tr>
<tr>
<td>high use areas</td>
<td>Naturalist Houses, Grandad Jobs, Lower and East Forks, Dead Basin</td>
<td>Grandad Jobs, Swift Creek, Chant Lakes, Around Basin</td>
<td></td>
<td></td>
</tr>
<tr>
<td># waters (lakes, ponds, etc)</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td># major trails</td>
<td>2</td>
<td>3</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>type outfitting</td>
<td>yes</td>
<td>stock non-stock</td>
<td>stock</td>
<td>stock</td>
</tr>
<tr>
<td># outfitted visitors (approx)</td>
<td>none</td>
<td>stock-100</td>
<td>stock-200</td>
<td>stock-200</td>
</tr>
<tr>
<td>additional rules and regulations</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td>no</td>
</tr>
<tr>
<td>type allotment</td>
<td>rec stock</td>
<td>sheep cows rec stock</td>
<td>sheep cows rec stock</td>
<td>sheep cows rec stock</td>
</tr>
<tr>
<td># UTM's (approx)</td>
<td>rec stock</td>
<td>cows - 50 rec stock-164</td>
<td>sheep -162</td>
<td>sheep (200)</td>
</tr>
<tr>
<td>&lt; dams, water sites</td>
<td>none</td>
<td>4 dams</td>
<td>8 dams</td>
<td>3 dams</td>
</tr>
<tr>
<td># KNAs</td>
<td>none</td>
<td>none</td>
<td>none</td>
<td>none</td>
</tr>
</tbody>
</table>

North Slope

<table>
<thead>
<tr>
<th>BURNS FORK</th>
<th>BEAVER CREEK</th>
<th>HENRY'S FORK</th>
<th>SMITHS FORK</th>
<th>E/M/W FORK</th>
<th>BLACKS FORK</th>
<th>STILLWATER &amp; EAST FORK</th>
<th>BEAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>hectares (acres)</td>
<td>1,254 (&lt; 25,000)</td>
<td>12,542 (30,855)</td>
<td>5,995 (14,987)</td>
<td>11,154 (27,884)</td>
<td>15,555 (38,888)</td>
<td>10,945 (27,362)</td>
<td>8,000</td>
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<td>counties</td>
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<td>Summit, UT</td>
<td>Summit, UT</td>
<td>Summit, UT</td>
<td>Summit, UT</td>
<td>Summit, UT</td>
<td>Summit, UT</td>
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<tr>
<td>type visitor</td>
<td>rural</td>
<td>rural</td>
<td>urban</td>
<td>rural</td>
<td>urban</td>
<td>rural</td>
<td>rural</td>
</tr>
<tr>
<td>visitor days (approx)</td>
<td>6,000</td>
<td>3,100</td>
<td>15,500</td>
<td>16,000</td>
<td>4,700</td>
<td>8,000</td>
<td>8,000</td>
</tr>
<tr>
<td>visitor attractions</td>
<td>lakes, hunting</td>
<td>easy access, lakes</td>
<td>easy access, Kings Peak lakes</td>
<td>Kings Peak lakes</td>
<td>lakes</td>
<td>lakes</td>
<td>lakes</td>
</tr>
<tr>
<td>high use areas</td>
<td>Island, Kahal Lakes, hunting</td>
<td>Gilbert, Beaver, Coffey Lakes</td>
<td>Bear, Susan, Giant, Island, Henry Fork &amp; Dollar Lk</td>
<td>Lower and East Forks, Red Castle Lakes, Horse Lake</td>
<td>west bench of East Little Fork, Dead Horse Lake</td>
<td>Sheep, Niece Lakes, Amethyst Basin</td>
<td></td>
</tr>
<tr>
<td># waters (lakes, ponds, etc)</td>
<td>4</td>
<td>1</td>
<td>3</td>
<td>4</td>
<td>6</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td># major trails</td>
<td>4</td>
<td>6</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>6</td>
<td>2</td>
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<td>type outfitting</td>
<td>stock</td>
<td>stock</td>
<td>non-stock</td>
<td>non-stock</td>
<td>stock</td>
<td>none</td>
<td>none</td>
</tr>
<tr>
<td># outfitted visitors (approx)</td>
<td>stock-100</td>
<td>stock-100</td>
<td>n-s-100</td>
<td>n-s-100</td>
<td>stock-100</td>
<td>stock-100</td>
<td>stock-100</td>
</tr>
<tr>
<td>further rules and regulations</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td>no</td>
</tr>
<tr>
<td>type allotment</td>
<td>sheep cows rec stock</td>
<td>sheep cows rec stock</td>
<td>sheep cows rec stock</td>
<td>sheep cows rec stock</td>
<td>sheep cows rec stock</td>
<td>sheep cows rec stock</td>
<td>sheep cows rec stock</td>
</tr>
<tr>
<td># UTM's (approx)</td>
<td>4</td>
<td>854 &lt; 125 rec-45</td>
<td>854 &lt; 65 rec-90</td>
<td>854 &lt; 115 rec-171</td>
<td>766 &lt; 132 rec-52</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td># dams, water sites</td>
<td>none</td>
<td>none</td>
<td>none</td>
<td>none</td>
<td>none</td>
<td>none</td>
<td>none</td>
</tr>
<tr>
<td></td>
<td>BURNT FORK</td>
<td>BEAVER CREEK</td>
<td>HENRYS FORK</td>
<td>SMITHS FORK</td>
<td>E/M/W FORK BLACKS FORK</td>
<td>STILLWATER &amp; EAST FORK BEAR</td>
<td></td>
</tr>
<tr>
<td>------------------------</td>
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<td>-------------</td>
<td>-------------------------</td>
<td>----------------------------</td>
<td></td>
</tr>
<tr>
<td># dams, snotel</td>
<td>1 dam</td>
<td>none</td>
<td>precip gauge aerial marker</td>
<td>none</td>
<td>none</td>
<td>none</td>
<td></td>
</tr>
<tr>
<td># RNAs</td>
<td>none</td>
<td>none</td>
<td>none</td>
<td>none</td>
<td>none</td>
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<td></td>
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</tbody>
</table>

Summary
Environmental Effects of Each Alternative

<table>
<thead>
<tr>
<th>ISSUE</th>
<th>ALTERNATIVE 1</th>
<th>ALTERNATIVE 2</th>
<th>ALTERNATIVE 3</th>
<th>ALTERNATIVE 4</th>
<th>ALTERNATIVE 5 (No Action)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Class I-23%</td>
<td>Class I-14%</td>
<td>Class I-49%</td>
<td>Class I-17%</td>
<td>No designation of Classes</td>
</tr>
<tr>
<td></td>
<td>Class II-68%</td>
<td>Class II-61%</td>
<td>Class II-58%</td>
<td>Class II-78%</td>
<td>Approx. 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts</td>
</tr>
<tr>
<td></td>
<td>Class III-9%</td>
<td>Class III-25%</td>
<td>Class III-2%</td>
<td>Class III-8%</td>
<td></td>
</tr>
<tr>
<td>1. Human overuse threatens integrity of ecosystem components.</td>
<td>No threat to ecosystem function.</td>
<td>Threat is expected to be low, but higher than for other alternatives.</td>
<td>No threat to ecosystem function.</td>
<td>Threat to ecosystem function is expected to be very low.</td>
<td>Threat to ecosystem function is expected to be very low.</td>
</tr>
<tr>
<td>2. Extent visitor solitude and primitive recreation experience are affected by other recreationalists, resource damage and rules and regulations</td>
<td>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).</td>
<td>Compared to Alternative 5, opportunities for visitor solitude are highly threatened due to increased Class III areas like Alt I, 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.</td>
<td>Compared to Alternative 5, opportunities for visitor solitude are highly enhanced due to increased Class I areas and decreased Class II &amp; III areas. Like Alt I, 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.</td>
<td>Compared to Alternative 5, opportunities for visitor solitude are moderately enhanced due to slightly decreased Class III areas. Like Alt I, increased regulation is possible in areas moving from Class III or II to Class II or I. Therefore, threat of increased regulation is moderate.</td>
<td>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.</td>
</tr>
<tr>
<td>ISSUE</td>
<td>ALTERNATIVE 1</td>
<td>ALTERNATIVE 2</td>
<td>ALTERNATIVE 3</td>
<td>ALTERNATIVE 4</td>
<td>ALTERNATIVE 5 (No Action)</td>
</tr>
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<td>-------</td>
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<td>---------------</td>
<td>----------------------------</td>
</tr>
<tr>
<td>Class I-23%</td>
<td>Class I-14%</td>
<td>Class I-40%</td>
<td>Class I-17%</td>
<td>No designation of Classes.</td>
<td>Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts.</td>
</tr>
<tr>
<td>Class II-68%</td>
<td>Class II-61%</td>
<td>Class II-58%</td>
<td>Class II-78%</td>
<td>Stock: N. Slope: 2 hunting O'Gs (300 service days each)</td>
<td></td>
</tr>
<tr>
<td>Class III-9%</td>
<td>Class III-25%</td>
<td>Class III-2%</td>
<td>Class III-5%</td>
<td>S. Slope: 5 hunting fishing O'Gs (service days limited by existing use patterns/resource conditions)</td>
<td></td>
</tr>
<tr>
<td>Minor negative economic effects in some drainages.</td>
<td>20%-50% reduction in service days available in Yellowstone and Unita. With redistribution, negative economic effects are minimal.</td>
<td>8%-61% reduction in service days in several drainages. Negative economic effects are higher than for other alternatives.</td>
<td>No negative economic effects.</td>
<td>Education other: (service days limited by existing use patterns/resource conditions)</td>
<td></td>
</tr>
<tr>
<td>Total service days available:</td>
<td>Total service days available:</td>
<td>Total service days available:</td>
<td>Total service days available:</td>
<td>N. Slope: no more than 2 in wilderness at one time</td>
<td></td>
</tr>
<tr>
<td>stock 1850</td>
<td>stock 1425</td>
<td>stock 1300</td>
<td>stock 2050</td>
<td>S. Slope: no more than two per district at one time</td>
<td></td>
</tr>
<tr>
<td>n-stock 2550</td>
<td>n-stock 2550</td>
<td>n-stock 1825</td>
<td>n-stock 2950</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4400</td>
<td>4025</td>
<td>3125</td>
<td>5000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maximum outfitter permits available.</td>
<td>Stock outfitting: no more than seven.</td>
<td>Non-stock outfitting: no more than four.</td>
<td>No new outfitting permits will be issued.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4% Extent system trails meet wilderness objectives</td>
<td>23% of area has no system trails. Increased erosion and sedimentation from trail activities is less likely than Alternative 5.</td>
<td>14% of area has no system trails. Increased erosion and sedimentation from trail activities is most likely when compared to all other alternatives.</td>
<td>40% of area has no system trails. Increased erosion and sedimentation from trail activities is least likely when compared to all other alternatives.</td>
<td>17% of area has no system trails. Increased erosion and sedimentation from trail activities is less likely than Alternative 5.</td>
<td>No system trails on approximately 23% of the acreage. Increased erosion and sedimentation from trail activities is less likely than Alternatives 2 and 3.</td>
</tr>
<tr>
<td>With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality.</td>
<td>With enforcement of existing camping and tethering of stock at least 200' from water, there is a threat to water quality.</td>
<td>With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality.</td>
<td>With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality.</td>
<td>With enforcement of existing camping and tethering of stock at least 200' from water, there is no threat to overall water quality.</td>
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</tr>
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<td></td>
<td>Class I-23%</td>
<td>Class I-14%</td>
<td>Class I-40%</td>
<td>Class I-17%</td>
<td>No designation of Classes.</td>
</tr>
<tr>
<td></td>
<td>Class II-68%</td>
<td>Class II-61%</td>
<td>Class II-58%</td>
<td>Class II-78%</td>
<td>Approximately 2000 acres on the west end do not meet wilderness standards as defined by the 1964 and 1984 Wilderness Acts.</td>
</tr>
<tr>
<td></td>
<td>Class III-9%</td>
<td>Class III-25%</td>
<td>Class II-2%</td>
<td>Class III-5%</td>
<td></td>
</tr>
</tbody>
</table>


- 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 Grandoddy 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.
<table>
<thead>
<tr>
<th>ISSUE</th>
<th>ALTERNATIVE 1</th>
<th>ALTERNATIVE 2</th>
<th>ALTERNATIVE 3</th>
<th>ALTERNATIVE 4</th>
<th>ALTERNATIVE 5 (No Action)</th>
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<td>Class I-17%</td>
<td>No designation of Classes.</td>
</tr>
<tr>
<td></td>
<td>Class II-68%</td>
<td>Class II-61%</td>
<td>Class II-58%</td>
<td>Class II-78%</td>
<td>Approximately 2000 acres</td>
</tr>
<tr>
<td></td>
<td>Class III-9%</td>
<td>Class III-25%</td>
<td>Class III-2%</td>
<td>Class III-5%</td>
<td>on the west end do not meet</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>wilderness standards as</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>defined by the 1964 and</td>
</tr>
<tr>
<td>7</td>
<td>Extent wildlife and fish habitat is protected</td>
<td>Habitat effectiveness not compromised significantly.</td>
<td>Habitat effectiveness not compromised significantly.</td>
<td>Habitat effectiveness not compromised significantly.</td>
<td>Habitat effectiveness not compromised significantly.</td>
</tr>
<tr>
<td>8</td>
<td>Extent air quality is affected by pollution and prescribed fire</td>
<td>During prescribed burns outside wilderness, air quality may be temporarily affected.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Extent prescribed fire is allowed to play its role</td>
<td>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.</td>
<td>Continue fire suppression actions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Extent archeological and historic resources are preserved</td>
<td>The alternatives are equal with respect to potential effects to archeological and historic sites. No alternative will have a significant effect on these resources.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Extent Research Natural Areas (RNA) are preserved</td>
<td>Values of RNAs are maintained under all alternatives.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shale Creek RNA is in Class I in alternatives 1-4. Proposed Paint Basin RNA is in Class II in alternatives 1-4</td>
<td></td>
<td>Values of RNAs are maintained.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Extent fish stocking meets wilderness objectives</td>
<td>Approximately 20 lakes in Class I may qualify for change in stocking practices.</td>
<td>Approximately five lakes in Class I may qualify for change in stocking practices.</td>
<td>Approximately 60 lakes in Class I may qualify for change in stocking practices.</td>
<td>Approximately 15 lakes in Class I may qualify for change in stocking practices.</td>
</tr>
</tbody>
</table>
|       | | | | | Underdetermined. Approximately 20 lakes in Class I may qualify for change in stocking practices.
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 destiny 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.

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.
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.

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, 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.

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.
WILDERNESS MANAGEMENT

Policy and direction for managing wilderness is derived from several sources at the National, Department, and Agency levels. 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 291.2).

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 visitor behavior.

Wilderness management policy in the Forest Service Manual (FSM 2320.3 & 2320.06) includes:

- 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.
- Cease uses and activities and remove existing structures not essential to the administration, protection, or management of wilderness for wilderness purpose 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...
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 and establish acceptable standards for wilderness 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 in-ting 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 threaten 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 untrammelled, secluded, inaccessible, and out of the way area. Many people are concerned that the sights, 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 don’ts” 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, special orders for camping, fires, group size

Issue 3. 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 HLW) 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) 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

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.

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


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 reveals that State water quality standards are not being violated by water generated from wilderness watersheds


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

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.

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
1. Contributing to changes in air quality related to pollution exterior to the wilderness that can currently deteriorate applications and therefore have 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).

**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. Re: 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 water will be shared with UDWR as negotiations proceed on an Memorandum of Understanding for management of aquatic habitats.**

**ISSUES CONSIDERED OUTSIDE THE SCOPE 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 development 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 scope 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 rule and regulations also apply to this area, they are discussed in Chapters II and 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, H.U.W 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 50 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 an 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 number 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.
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 (1966). The act 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).

The business of managing habitat for fish and wildlife has been conducted by the U.S. Fish and Wildlife Service. Over the past few years, proponents of sustaining the native fish and other non-fish aquatic species and allowing ecological processes freedom to operate without any human influence have 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 oppose 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.
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 groups suggested various ways for mapping Classes across the High Uinta 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 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 prehistoric 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 hydrometeorological 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.
Wilderness dependent research, including Research Natural Areas (RNAs) is appropriate and encouraged. Scientific values of the HWU 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 (e.g., 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, carcass monitoring, etc.)
- Agency budget allowance for proper and effective administration and monitoring of outfitter permits.

Criteria F. Lakes and trail corridors in Duchesne River, Henry's Fork, Smith Fork and East/Stillwater Forks of the Deer 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 is 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. Appropriately 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.
<table>
<thead>
<tr>
<th>Resource</th>
<th>Indicator</th>
<th>Standard</th>
<th>Monitoring Plan</th>
<th>Rationale</th>
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<tr>
<td>Air Quality</td>
<td>Deposition</td>
<td><em>All Classes</em>: Nitrate and Sulphate loading will not exceed 3-5 kg/hectare/yr and five kg/hectare/yr, respectively</td>
<td>One to three deposition sites near lake sites (see monitoring sites for surface water chemistry)</td>
<td>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.</td>
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<td>Standard Visual Range</td>
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<td><em>All Classes</em>: Long-term visibility impairment from human activities will not impair long term baseline visual range more than 10% of the 90th percentile (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</td>
<td>Visual monitoring near Mill Park. Smoke emissions modeling.</td>
<td>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.</td>
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<td>Surface Water</td>
<td>Chemistry</td>
<td><em>All Classes</em>: Alkalinity will not be reduced more than 10% of the baseline in all surface waters. State of Utah water quality standards for pH, nitrites and sulfates, as defined in State of Utah Standards of quality of the Waters of the State (Amended 1991) Section R-148-2-14-2, Numeric Criteria for Wildlife</td>
<td>Monitor appropriate number of sites (presently monitoring Dean, Bluebell*, and Walk-up Lakes).</td>
<td>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.</td>
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<td>Water Quality</td>
<td>coliform bacteria</td>
<td>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.</td>
<td>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.</td>
<td>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.</td>
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<td>trail placement design</td>
<td>Class I trailless*</td>
<td>Standards adhered to during trail construction and reconstruction.</td>
<td>Trails can be a non-point source of sediment pollution to streams and other surface waters. Trails located in these areas will inevitably affect surface water quality, subsurface water flow patterns and wetlands and riparian area function. * Where a system trail (one identified on the HUW map) passes through Class I, the trail (1/4 mile corridor) is zoned as Class II</td>
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<td>Class II &amp; III: Trails avoid wetlands</td>
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<td>Class II &amp; III: Trails avoid stream crossings where bank gradients are greater than 30%.</td>
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<td>Class II &amp; III: Trails are designed and maintained so water does not run down the trail</td>
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<td>trail switchbacks</td>
<td>Class I trailless*</td>
<td>Field observation and incident report analysis.</td>
<td>Short cutting trail switchbacks leads to deterioration of constructed trails. Shortcuts between switchbacks can severely erode causing sedimentation in streams and irreparable damage to trails.</td>
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<td>Class II &amp; III: Trail switchbacks do not show signs of shortcutting. [Special Order 36 DFR 261 55(e)]</td>
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<td>camping distance from water sources</td>
<td>All Classes: Terrain permitting campsites must be at least 200 feet from water [Special Order 36 CFR 261 58(e)]</td>
<td>Field observation and incident report analysis.</td>
<td>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 must be some place where camping close to water causes pronouced pollution. Other researchers (Tailor and Erman, 1978) speculate that some subtle changes in aquatic ecosystems may be the result of recreation activities close to the lake shore.</td>
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<td>bedding or tethering any recreation stock</td>
<td>All Classes: Stock cannot be tethered within 200 feet of water sources for more than two hours. [Special Order 36 CFR 261 58 (aa)]</td>
<td>Field observation and incident report analysis.</td>
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<td>Soil Quality</td>
<td>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.</td>
<td>Class I: No more than 15% of all use areas have erosion Class I characteristics. 0% erosion Classes II or III.</td>
<td>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.</td>
<td>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.</td>
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<td>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.</td>
<td>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.</td>
<td>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.</td>
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<td>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.</td>
<td>Class III: Monitor trend in campsite condition on one drainage (or portion of) that exceeds erosion Class III standards, at least once every 10 years.</td>
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<tr>
<td>Wildlife and Fisheries</td>
<td>Bank erosion (for aquatic habitat)</td>
<td>No standard (baseline inventory has not been completed)</td>
<td>Monitoring plan</td>
<td>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 reservoir lakes are clustered, can result in channel adjustments and loss of aquatic habitat downstream.</td>
</tr>
<tr>
<td>Neotropical birds</td>
<td></td>
<td>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.</td>
<td>No monitoring plan</td>
<td>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.</td>
</tr>
<tr>
<td>Habitat available for US Fish and Wildlife Service listed threatened or endangered (TE) species (none as of 1996) and Forest Service sensitive (S) species</td>
<td></td>
<td>All Classes: Once inventories are complete, a specific acreage of habitat available will be the standard.</td>
<td>No monitoring plan</td>
<td>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.</td>
</tr>
<tr>
<td>Resource</td>
<td>Indicator</td>
<td>Standard</td>
<td>Monitoring Plan</td>
<td>Rationale</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Vegetation</td>
<td>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.</td>
<td>No more than 10% of habitat for sensitive species: Papaver radicatum var. Pygmaea and Draba densiflora var. Apiculata are not adversely altered by human uses.</td>
<td>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.</td>
<td>These plants reside on talus slopes at very high elevations. The potential for habitat alteration by human uses is very low.</td>
</tr>
<tr>
<td>Alpine vegetation types slopes 10% of potential ground cover</td>
<td>All Classes: 85% of potential ground cover</td>
<td>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.</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>Alpine types slopes 10% of potential ground cover</td>
<td>All Classes: 85% of potential</td>
<td>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.</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>Aspen types potential ground cover</td>
<td>All Classes: 85% of potential</td>
<td>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.</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>Riparian types (away from greenline), potential ground cover</td>
<td>All Classes: 85% of potential</td>
<td>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.</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>Riparian types (greenline*) stream bank stability</td>
<td>All Classes: 85% of potential (standard criteria in ‘Integrated Riparian Evaluation Guide’)</td>
<td>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.</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>Natural fire regime</td>
<td>All Classes: 100% of prescribed fires (PF) are managed so fire can play, as nearly as possible, its natural role in the ecosystem.</td>
<td>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 (PFN) status.</td>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>

*For stream types where vegetation has a strong stream bank controlling influence (F. and others), the greenline is an indicator of resource value for fish habitat and other stream functions.
<table>
<thead>
<tr>
<th>Resource</th>
<th>Indicator</th>
<th>Standard</th>
<th>Monitoring Plan</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vegetation</td>
<td>Tethering stock directly to a tree [Special Order CFR 261 52 (a)]</td>
<td>All Classes: Over two hours or sooner if damage to the tree or vegetation at the base of the tree is occurring</td>
<td>Field observation and incident report analysis</td>
<td>When stock are tied to trees for long periods, they excavate wells around the vase of trees, exposing and trampling roots (McClaren and Cole, 1993).</td>
</tr>
<tr>
<td></td>
<td>Overnight use or grazing by recreational stock [Special Order 36 CFR 261 57 (c)]</td>
<td>No overnight use or grazing by rec stock in Chain Lakes basin (Uinta drainage)</td>
<td>Field observation and incident report analysis</td>
<td>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).</td>
</tr>
<tr>
<td>Resource</td>
<td>Indicator</td>
<td>Standard</td>
<td>Monitoring Plan</td>
<td>Rationale</td>
</tr>
<tr>
<td>-------------------</td>
<td>-----------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Recreation</td>
<td>Litter human waste</td>
<td>All Classes: Disposing of litter or waste in an inappropriate way</td>
<td>Field observation and incident report analysis</td>
<td>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)</td>
</tr>
<tr>
<td></td>
<td>Campsite density (distance between occupied campsites)</td>
<td>Class I: 80% probability occupied campsites are one mile apart</td>
<td>Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years.</td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>Campsite assessment rating (modified from campsite assessment rating David Cole defined in 1988)</td>
<td>Class I: 0% campsites have an SII rating greater than 40</td>
<td>Monitor trends in campsite density on one drainage (or portion of) that threatens to exceed standards at least once every five years.</td>
<td>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 asectics 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 asectics. Campsite inventory and monitoring in Grandaddy Basin (1992 and 1996) resulted in a spread of SII ratings of 66-26.</td>
</tr>
<tr>
<td></td>
<td>Group size</td>
<td>Class I: seven people seven stock</td>
<td>Field observation and registration card analysis</td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Class II: 14 people 15 stock [Special Order 36 CFR 261:58(f)]</td>
<td></td>
<td>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 prefer 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.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Class III: 14 people 15 stock [Special Order 36 CFR 261:58(f)]</td>
<td></td>
<td>Recommended. Cole (1987) indicates that small parties are critical to avoid the creation of new campsites and trails in little-used places.</td>
</tr>
<tr>
<td></td>
<td>Length of stay at one campsite</td>
<td>Class I: 1-2 nights maximum recommended overnight stay</td>
<td>Field observation and incident report analysis</td>
<td>Interpretation of the 1964 Wilderness Act, &quot;where man is a visitor who does not remain.&quot; In addition, this prevents campers from taking up long-term residence, and permits sites to be used by other visitors.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Classes II &amp; III: 14 nights at an individual site [Special Order 36 CFR 261:58(a)]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resource</td>
<td>Indicator</td>
<td>Standard</td>
<td>Monitoring Plan</td>
<td>Rationale</td>
</tr>
<tr>
<td>--------------</td>
<td>----------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Recreation</td>
<td>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.</td>
<td>“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).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
|              |                                                                             | **Class I**: no restrictions  
**Class II**: no restrictions  
**Class III**: no restrictions  
“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 within 1/4 mile of the activity area at the beginning of the following season when the standard is exceeded  
**Scarcity 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. | 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) will be sampled to determine the amount of wood potentially available for campfires.  
Data transects will be in random 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 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 the firewood collection and 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 (Darville, 1979). |
|              |                                                                             |                                                                                                                                                                                                 |                                                                                                                                                                                                          | Scarcity to no dead woody debris available for campfires while still providing the size classes of wood most important for nutrient cycling within the ecosystem.  
**Classes 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. |
<table>
<thead>
<tr>
<th>Resource</th>
<th>Indicator</th>
<th>Standard</th>
<th>Monitoring Plan</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recreation</td>
<td>Campfires</td>
<td>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)]</td>
<td>Field observation and incident report analysis.</td>
<td>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).</td>
</tr>
<tr>
<td>Outfitting guiding permits</td>
<td>Stock 7*</td>
<td></td>
<td>Administration of permits</td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>Non-stock 4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Outfitting guiding service days: stock use</td>
<td>Each alternative defines maximum authorized service days available by drainage (see description of alternatives Chapter II)</td>
<td>Monitor operating plans and actual use reports.</td>
<td>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).</td>
<td></td>
</tr>
<tr>
<td>Outfitting guiding service days: non-stock use outfitters</td>
<td>Each alternative defines maximum authorized service days available by drainage (see description of alternatives Chapter II)</td>
<td></td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>Outfitting guiding type camps</td>
<td>Class I: Drop camps only, no spike or assigned camps. Over night group size limited to seven people and or seven stock.</td>
<td></td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Class II: Maximum one assigned site per drainage.</td>
<td></td>
<td>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 stocking use to transport camp equipment and supplies during the season.)</td>
<td></td>
</tr>
</tbody>
</table>
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

<table>
<thead>
<tr>
<th>Drainage</th>
<th>Stock</th>
<th>Non-Stock</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duchene</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Rock Creek</td>
<td>300</td>
<td>250</td>
</tr>
<tr>
<td>Lake Fork</td>
<td>150</td>
<td>650</td>
</tr>
<tr>
<td>Yellowstone</td>
<td>300</td>
<td>550</td>
</tr>
<tr>
<td>Uinta</td>
<td>300</td>
<td>450</td>
</tr>
<tr>
<td>Barret Fork</td>
<td>150</td>
<td>0</td>
</tr>
<tr>
<td>Barret Creek</td>
<td>150</td>
<td>0</td>
</tr>
<tr>
<td>Smiths Fork</td>
<td>150</td>
<td>0</td>
</tr>
<tr>
<td>E. M.W. Forks</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>E. Stillwater Fork</td>
<td>50</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>1450</td>
<td>2550</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Drainage</th>
<th>Stock</th>
<th>Non-Stock</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duchene</td>
<td>6</td>
<td>50</td>
</tr>
<tr>
<td>Rock Creek</td>
<td>300</td>
<td>200</td>
</tr>
<tr>
<td>Lake Fork</td>
<td>150</td>
<td>650</td>
</tr>
<tr>
<td>Yellowstone</td>
<td>100</td>
<td>300</td>
</tr>
<tr>
<td>Uinta</td>
<td>200</td>
<td>300</td>
</tr>
<tr>
<td>Barret Creek</td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>Barret Fork</td>
<td>150</td>
<td>0</td>
</tr>
<tr>
<td>Smiths Fork</td>
<td>150</td>
<td>0</td>
</tr>
<tr>
<td>E. M.W. Forks</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>E. Stillwater Fork</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>TOTAL</td>
<td>1475</td>
<td>2550</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Drainage</th>
<th>Stock</th>
<th>Non-Stock</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duchene</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Rock Creek</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>Lake Fork</td>
<td>350</td>
<td>600</td>
</tr>
<tr>
<td>Yellowstone</td>
<td>300</td>
<td>550</td>
</tr>
<tr>
<td>Uinta</td>
<td>75</td>
<td>150</td>
</tr>
<tr>
<td>Burnt Fork</td>
<td>25</td>
<td>0</td>
</tr>
<tr>
<td>Bear Creek</td>
<td>50</td>
<td>0</td>
</tr>
<tr>
<td>Henrys Fork</td>
<td>100</td>
<td>75</td>
</tr>
<tr>
<td>Smiths Fork</td>
<td>125</td>
<td>150</td>
</tr>
<tr>
<td>E. M.W. Forks</td>
<td>200</td>
<td>250</td>
</tr>
<tr>
<td>E. Stillwater Fork</td>
<td>25</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>1300</td>
<td>1825</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Drainage</th>
<th>Stock</th>
<th>Non-Stock</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duchene</td>
<td>0</td>
<td>50</td>
</tr>
<tr>
<td>Rock Creek</td>
<td>400</td>
<td>500</td>
</tr>
<tr>
<td>Lake Fork</td>
<td>400</td>
<td>700</td>
</tr>
<tr>
<td>Yellowstone</td>
<td>350</td>
<td>600</td>
</tr>
<tr>
<td>Uinta</td>
<td>300</td>
<td>450</td>
</tr>
<tr>
<td>Burnt Fork</td>
<td>75</td>
<td>50</td>
</tr>
<tr>
<td>Bear Creek</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Henrys Fork</td>
<td>50</td>
<td>100</td>
</tr>
<tr>
<td>Smiths Fork</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>E. M.W. Forks</td>
<td>250</td>
<td>150</td>
</tr>
<tr>
<td>E. Stillwater Fork</td>
<td>50</td>
<td>150</td>
</tr>
<tr>
<td>TOTAL</td>
<td>2050</td>
<td>2950</td>
</tr>
</tbody>
</table>
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-61-64)

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 1 (ALRMP IV-9)

Recreation. No developed recreation sites.

Entry permits or other types of management tools may be necessary to prevent over-use or user conflict. VQO is protected. 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.


Water Quality. Ashley NF - No specific direction.

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

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.

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 June 7, 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).
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. 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.

Alternatives

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.

chapter three
AFFECED 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 Restland (UB 1) landtype are found fieldfield, meadow, snowdrift slopes, and boulder field phases. Soils in the fieldfield 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 snow. 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, Henry’s 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
- Heuys Fork
- Smiths Fork
- East/Middle/West Fork Blacks Fork
- East/Stetwater 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/Stetwater Fork Bear River, East/Middle/West Fork Blacks Fork, Smiths Fork, Heuys 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 Uinta 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 Uinta 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 hemispheric.

Among the common ones of the rounded or nearly flat summits are alpine avens (Geum rossii), curly sedge (Carex turgescens), moss campion (Silene acaulis). Bellard kobresia (Kobresia bellardii). and blackroot sedge (Carex eglionidea). Uinta beardtongue (P. stenophyllum) 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 skye-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 Ryberg 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 plantain 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 timberrock grass (Danthonia intermedia).

Engelmann spruce is the dominant tree at upper elevations of the coniferous forest where greuse whortleberry (Vaccinium scoparium) is the common understory plant. Lodgepole pine is increasing common with decreasing elevation and is the domanate 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 Uinta 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 trilliums 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 wax 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 110 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 lighting 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 2910 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 7,000 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 scarred 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 1890 and 1903.

Corresponding evidence of recorded in the ponderosa pine belt on both Districts which

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 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), downded 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 fuel 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 Policies. 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
III

The Dome to C "hoep eliminated

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
inhabit 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,
Cooper's hawk, goshawk, shrike and red
tailed hawk. Waterfowl occupy an 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 ruffled 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.

Mountain goats were released on Bald
Mountain in 1987. Goats were also released

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
Townsend's 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
Clumped 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 Beartooth*.
Boreal toad#
Alpine Poppy*

Aquatc 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
grass 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 snare, traps, dogs, and shooting. Aerial gunning, M-44s and denning are not allowed.

Table 35.1 Present fish in High Uinta lakes: 1 OWRF defines a lake suitable for game fish, as those 2 acres and above.

<table>
<thead>
<tr>
<th>Total number of lakes</th>
<th>Lakes greater than or equal to two acres</th>
<th>Lakes with fish</th>
<th>Total percent of lakes with fish</th>
<th>Total percent of lakes greater than or equal to two acres with fish</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Slope</td>
<td>416</td>
<td>194</td>
<td>98</td>
<td>23%</td>
</tr>
<tr>
<td>South Slope</td>
<td>937</td>
<td>278</td>
<td>178</td>
<td>19%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>1353</td>
<td>372</td>
<td>276</td>
<td>21%</td>
</tr>
</tbody>
</table>

RANGELAND RESOURCES (by drainage)

- The north end of the Duchesne River drainage has never been a livestock allotment, but is grazed by approximately 216 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 1980. 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 Oweppe Sheep Allotment. Sheep are trailed into upper Lake Fork Creek and Oxtoson Basin over Red Knob and Squaw Passes. Yearly, 1362 AUMs graze this allotment. Sheepherder camps (tent platform, salt house) are located in upper Lake Fork*. Lambert Meadow, Upper Oweppe and Oxtoson 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.
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 Hassie Lake-Henrys Fork sheep allotment. About 854 AUMs are used here annually. Red Mountain cattle allotment grazes 95 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 Smith 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 Blackfish 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 Drainage:** Superior, Drift, Bluebell, Deer, White Miller, Farmers, East Timothy
- **Unita Canyon Lower Chain, Upper Chain, Atwood, Fox, Crescent**
- **Burnt Fork Island**

Snow measurement devices (Snow-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 Unita Wilderness and in immediately adjacent areas.

Four areas in the High Unita 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.

Near 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 course, locally available quartzite that was being fashioned into large scrapers and bifaces. Some fine grained cherts and an occasional piece of obsidian also are 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...
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.

Recreationalists perceive the landscape to be naturally appearing, with minor evidence of humans. Except for areas around lakes, streams, trails and big 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 impassable stretches of wet willow bottom and large mountain peaks, give the visitor the sense of being "small" in a big country, thus 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-looking 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 10% 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 unenhanced 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 Use 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 railheads. 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. Bowhunting 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, when they 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 continuation 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.

**Landscapes.** (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 untraded and relatively "pristine" ground exists is important.
SOCTAL 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 nationwide 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 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 State, and a booming local economy. 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 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 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.
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 statewide economic output multiplier of 1.4 (multipliers suggested in a personal conversation with Bruce Godfrey, Economist—USU Extension, 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 Outfishing 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 $3,500 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 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 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 500 service days of use on the North Slope of the High Uintas Wilderness Area. To date, use has never reached permitted levels. Over the 1994 and 1995 seasons, these four stock-use outfitter/guide’s 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.
other two operations provide opportunities for hiking and teach environmental education, wilderness ethics and 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 permits. 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 permits 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 7,000 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 fishing 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 trailless Marshall Canyon and Shale Creek areas provide willing visitors with outstanding opportunities for solitude. Very few recreationists visit these two areas and campfire 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 tree limbs. 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 in 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 (#1060) 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 Ottsion 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.

Other Lake Fork Creek:

- Hades-Rocky Sea Pass trail (#1074) provides access into Grandaddy Lakes from the south and north cast. 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 Grandaddy 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 Grandaddy 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 Pato 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 Ottsion). The main Lake Fork canyon is divided by Lake Fork Creek and Owep Creek. Unique features of the drainage include Uinta Gorge. Fewer lakes in the head of the drainage than the other drainages. Historic evidence of dam building and human influence, trailless Owep Creek, 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
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 Sweep 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.

\textbf{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 a concentrated around fishable lakes. Of the 220 waters (lakes, reservors, 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.
• 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.

**UNTA 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 treeline.

This drainage received approximately 13,000 visitor days 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; 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 Whitecrotch 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 re-vegetated.

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.
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.

- Kabell Meadows Trail (#122) provides access from Hoop Lake through Kabell Meadows and connects to North Side Highline Trail (#105). Use is moderate.

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

- Kabell Ridge Trail (#128) 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.

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

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 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.

**BURNS 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

Island Lake Trail 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 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 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 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.

This unit is served by six trails:

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

- Joulous Creek Trail provides access.
access from Bullocks Park, through Jowlous and Deadhorse Parks to North Side Highline Trail (\#105). Use is moderate

• West Fork Beaver Creek (#119) provides access along creek from West Fork Beaver Creek 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 Creek (#120) provides access along creek from Middle Fork Beaver Creek 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 aesthetics. 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.

Affected Environment

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

H E N R Y S F O R K

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, Henry, 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.

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 Gunnsight 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 Dahlgreen 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

SMI S H S F O R K

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 backdrop 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 most heavily 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.
reaches heavy use because it is the closest sized 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 Henry's 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 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 Ejdol 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 Squaw Pass. Oak 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 (#110)**

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.
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 Kermshuh 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 Notice and Prior 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.

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

<table>
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<tr>
<th>DECHESNE RIVER</th>
<th>ROCK CREEK</th>
<th>LAKE FORK</th>
<th>YELLOWSTONE &amp; SWIFT CREEKS</th>
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<td>25,232 (63,081)</td>
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<td>Kings Peak, lakes</td>
<td>Kings Peak, lakes</td>
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**High use areas:**
- Naturalist Basin
- Grandaddy Basin, & Laus Basin
- Brown Basin, Swell Creek
- Chace Lakes, Awsum Basin

- *waters (lakes, ponds, etc.) > 1 surface acre
- *waters w/ fish
- *major trails
- *type outfitting
- *outfitted s-days
- *AUMs (approx)
- *days, motel sites
- *RNAs

| hectares (acres) | 9200 (23,000) | 24,828 (62,069) | 25,232 (63,081) | 28,981 (72,432) | 29,484 (73,710) |
| county | Summit | Duchesne | Duchesne | Duchesne |
| type visitor | urban | urban | rural | rural |
| visitor days (approx) | 7,000 | 14,000 | 13,000 | 13,000 |
| visitor attractions | lake accesses: lakes | lake accesses: lakes | Kings Peak, lakes | Kings Peak, lakes |

**High use areas:**
- Island, Kabell Lakes, hunting camps
- Gilbert, Beaver, Coffin Lakes
- Bear, Sawmill, Grass, Island, Henrys Fork & Delea Lk
- Lower and East Red Castle Lakes, Hesse Lake
- West bench of East Little Fork, Dead Horse Lake
- Sheep, Notice, Lakes, Amethyst Basin

### HIGH UINTAS WILDERNESS EXISTING CONDITIONS (1994)

#### North Slope

<table>
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<tr>
<th>BURNET FORK</th>
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<th>SMITHS FORK</th>
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**High use areas:**
- Island, Kabell Lakes, hunting camps
- Gilbert, Beaver, Coffin Lakes
- Bear, Sawmill, Grass, Island, Henrys Fork & Delea Lk
- Lower and East Red Castle Lakes, Hesse Lake
- West bench of East Little Fork, Dead Horse Lake
- Sheep, Notice, Lakes, Amethyst Basin

| hectares (acres) | 9234 (23,084) | 12,342 (30,855) | 5995 | 11,154 | 15,555 |
| county | Summit, UT | Summit, UT | Summit, UT | Summit, UT | Summit, UT |
| type visitor | rural | rural | urban | urban | rural |
| visitor days (approx) | 6,000 | 3,100 | 15,500 | 16,000 |
| visitor attraction | lakes, hunting camps | easy access, lakes | easiest access Kings Pk |

**High use areas:**
- Island, Kabell Lakes, hunting camps
- Gilbert, Beaver, Coffin Lakes
- Bear, Sawmill, Grass, Island, Henrys Fork & Delea Lk
- Lower and East Red Castle Lakes, Hesse Lake
- West bench of East Little Fork, Dead Horse Lake
- Sheep, Notice, Lakes, Amethyst Basin

### HIGH UINTAS WILDERNESS EXISTING CONDITIONS (1994)
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<th>Affected Environment</th>
<th>BURNT FORK</th>
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<th>STILLWATER &amp; EAST FORK</th>
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Chapter four
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
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.

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 wind swept 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 level. That are sufficient to sustain native plant communities.

Environmental Consequences

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 trampling 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 campsites density and bare ground/soil erosion standards (See Chapter II).
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 phosphorus. Such debris supports reccurcorrhoea 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 (USDA Forest Service, 1994). W.C.F. Staley, 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 2% 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 formation of areas with widespread accelerated erosion of topsoil is the next greatest among all the action alternatives. 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 in small, high elevation watersheds are: Naturalist Basin Four Lakes Basin Garfield Basin Brown Duck Basin Chain of Lakes Basin Atwood Basin Amethyst Basin Red Castle Basin.

Approximately 2000 acres in some of the 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.
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 larger 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 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 opportunities
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,
range 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
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
can 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 mechnized 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

Environmental Consequences
Certain Areas:

Overnight use of horses in Chia 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 educate 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. These criteria 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...
Environmental Consequences

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, both the public and outfitters will be targeted for additional education efforts and/or restrictions 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 4000

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 9/1 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; and allows no more than two groups per district at any one time.

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/guides operations:

Permitted outfitting and guiding operations are of basically 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).

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.

No-stock type outfitting/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 stall 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 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 Adirondacks).

It is impossible to estimate the exact extra cost to the outfitter of partial relocation 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 alternative; 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 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 decreases 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 somewhere) 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.
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 Heenys 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.

The 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 $2,000 in gross revenues which would adversely 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 considered a serious impact adversely 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 Foss 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 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 the point that only a few are willing to pay to enjoy 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 outfitter 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 outfitted 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 157 service days and non-stock use by 1,397 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 2,429 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 5,200 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

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 trailless 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 guideline, 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 trailless 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 (FSI 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


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 decrease in the acreage of essentially trailless 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

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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 the 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 Conditions. 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 arable. 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 occurrence, 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 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 were being managed and monitored, cautionary posting would be necessary at trailheads 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 boundary.

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 throughout 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 effects 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 large 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-aged 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 growing 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.

Issue 10: 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-SPHO, 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 over 1000 fishless waters.

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.
### Environmental Effects of Each Alternative

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

### 6 Exotic plant species threaten functions of ecosystem by replacing native plant species

<table>
<thead>
<tr>
<th>ALTERNATIVE 1</th>
<th>ALTERNATIVE 2</th>
<th>ALTERNATIVE 3</th>
<th>ALTERNATIVE 4</th>
<th>ALTERNATIVE 5 (No Action)</th>
</tr>
</thead>
<tbody>
<tr>
<td>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 &amp; 5.</td>
<td>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.</td>
<td>No threat to ecosystem function is expected due to decreased levels of human induced disturbance.</td>
<td>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 &amp; 5.</td>
<td>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 &amp; 4.</td>
</tr>
</tbody>
</table>

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.
<table>
<thead>
<tr>
<th>ISSUE</th>
<th>ALTERNATIVE 1</th>
<th>ALTERNATIVE 2</th>
<th>ALTERNATIVE 3</th>
<th>ALTERNATIVE 4</th>
<th>ALTERNATIVE 5 (No Action)</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>Extent wildlife and fish habitat is protected</td>
<td><strong>Habitat effectiveness not compromised significantly</strong></td>
<td><strong>Decrease in habitat effectiveness due to higher human use (25% Class III)</strong></td>
<td><strong>Habitat effectiveness not compromised significantly</strong></td>
<td><strong>Habitat effectiveness not compromised significantly</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>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</td>
</tr>
<tr>
<td>8</td>
<td>Extent air quality is affected by pollution and prescribed fire</td>
<td>During prescribed burns outside wilderness, air quality may be temporarily affected.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Extent prescribed fire is allowed to play its role</td>
<td>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.</td>
<td>Continue fire suppression actions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Extent archeological and historic resources are preserved</td>
<td>The alternatives are equal with respect to potential effects to archeological and historic sites. No alternative will have a significant effect on these resources.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Extent Research Natural Areas (RNA) are preserved</td>
<td>Values of RNAs are maintained under all alternatives.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Shale Creek RNA is in Class I in alternatives 1-4. Proposed Painter Basin RNA is in Class II in alternatives 1-4</td>
<td>Values of RNAs are maintained.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Extent fish stocking meets wilderness objectives</td>
<td>Approximately 20 lakes in Class I may qualify for change in stocking practices.</td>
<td>Approximately five lakes in Class I may qualify for change in stocking practices.</td>
<td>Approximately 60 lakes in Class I may qualify for change in stocking practices.</td>
<td>Approximately 15 lakes in Class I may qualify for change in stocking practices.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Undetermined. Approximately 20 lakes in Class I may qualify for change in stocking practices.</td>
</tr>
</tbody>
</table>

No effects on federally listed threatened or endangered species. Viability of Forest Service designated sensitive species not threatened.
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.


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.

Jodie 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.

Reece 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.

Chauncey 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 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 Bistrisky
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 Tucker
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

ORGANIZATIONS AND INDIVIDUALS
(Some received summaries only.)

Greg Madsen
Dave Howells
Back Country Horseman of Utah
Andrew White
Harold Edwards
Douglas Chinn
Janet Howard
Jay Smith
Jerry Over
Martin Stetz
Richard Warnick
Albert Collotzi
Dana Landale
Lance Parry

Joleen Bell
Thomas Jyon
Chris Cur·mings
Uintah Mountain Club News
South Slope - Outfitter Guide (unnamed)
Uintah Basin Standard - newspaper aricle
Will Durant, Uintah Mountain Chi-b
Jack Prescott
Rick Van Wagenen
Erica Wangsgard
David Hoefler
Ralph Duncan
George Nickas
Dick Carter
High Uintas Wilderness Preservation Council
Stan Troxer
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
chapter seven
Dear Mr. Asay:

As a user 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 I may 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 including the 200 foot camping restriction around streams and lake shores. Although having to deal with a permit at all takes something away from the experience, I accept it in its present form and feel it does place some accountability on users. The last 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 unpleasant as 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 it ever 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 palatable ways to limit visitor use is to maintain trails only where necessary to 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 produce recovery of a campsite. Therefore it may be wise to allow the 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 those 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 (including elk, deer, moose, and domestic livestock) such as bedding areas, I question what the real environmental impact of a number of sites around a lake are in total acres of reduced production (especially when expressed as a percentage) and water pollution. Possibly a few rustic outhouses (and their required use) could prevent water contamination problems in these areas if it is a problem.

If I have spent considerable time hunting and packing in the area (and many other roadless areas) and I have not noticed an “overcrowding” problem except at a 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 II 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 plans do not propose any new regulatory mechanisms to encourage the dispersal, 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 at 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.
be done by requiring minimum impact camping and other methods I have discussed above especially in heavily used areas. I look forward to receiving any information you can provide me with and thank you in advance for reviewing my comments.

Sincerely,

Greg C. Mladenka
1383 N 800 W
West Bountiful, UT 84087
(801) 298-0292 home
(801) 538-7375 day

(1b) 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.

(1l) 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,n) This comment(n), 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.
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.

[long and short term standard visible range standards should be specific to on-Forest activities, as the Forest Service has no control over impacts from urban and private air pollution sources]

[Similarly, the alkalinity standard could be affected by aerial inputs outside Forest Service jurisdiction. It is unclear how a > 10% reduction due to off-site acid precipitation or other factors would be remedied by changes in Wilderness management]

[Restrictions on bedding and tethering of recreation livestock are warranted. However, there will certainly be overlapping impacts due to cattle and sheep operations present in the area. For example, in some situations, livestock tend to spend a majority of time in riparian (both lake and stream) environments. This may affect soil quality/erosion, and yet in the document there is no connection with these potential impacts and that of recreational users and their stock] On page 1-11, it is stated that "Any grazing decisions will continue to be made in Allotment Management Plans or the equivalent." Prior to that, it is stated that "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...". The High Uintas Forest Management Plan Amendment seems the perfect vehicle to incorporate the effects of ALL users. It seems artificial to separate effects and needs of the two groups. I disagree that grazing management should be left to a separate management plan. It appears inconsistent, and perhaps ineffective to place restrictions on recreational stock (which I do agree with) in a basin that also serves as a cattle or sheep allotment. No one is keeping those animals out of 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.

(10) 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 not 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 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 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 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)" 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 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 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 standard for Class I versus Classes II and III? Limiting group size to 7 people and 7 stock over all classes seems preferable.

A fourteen day stay at one campsite will certainly cause significant damage to the area. Possibly it will recover if left alone for several years; however, I have seen certain large groups return to such areas year after year. Would it be better to limit stays at any particular site to 2 or 3 nights, or would that be counter productive, difficult to enforce, etc?

Typographical error on S-23 Rationale, "visitor use should not effect". Effect should be "affect" in this context.

"Area" should be defined in regard to wood gathering standards.

Campfire use restrictions should probably be seasonal in some areas, as winter users tend to use different wood sources (further from the ground, more large deadfall than small twigs and branches) than summer/fall campers.

Typographical error on S-25. "species fish" should be "species of fish".

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 size 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 dominant 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 bedrock 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 campers. The concentration of campers 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 90% and 95% of wilderness visitors travel in group sizes of 10 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 Vernath, 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. 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 among 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.

On 4-17, it is stated that Alternative 1 provides “significant opportunities for growth” of commercial guiding. Again, I am against increases in commercial outfitting in basins 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 north slope 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.

On 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.

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,

[Signature]

Greg C. Mladenka
1393 N 800 W
West Bountiful, UT 84087
(801) 296-0292 home
(801) 538-7375 office

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(1a) 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 2-17 were designed to provide early warning of degrading resource conditions and the need for campsite rehabilitation, closure, or restoration. In extreme cases, 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.
September 15th, 1996

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 really necessary tends to complicate matters, multiply problems, and diminish the effectiveness of the plan.

Considering the apparent budgetary constraints now facing the Forest Service, it appears to us that the proposed management plan is 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. It's not make the management plan so complex that it unnecessarily diminishes the opportunity for people to share and enjoy the wilderness.

Not too long ago the Ashley and Wasatch-Cache Forests each had different user group size 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 261.58(f). The numerical limit itself, however, is not so much an issue as is the amount of abuse inflicted on 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 conscientious 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.

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 ori-
popular philosophy 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, actually protect the integrity of wilderness. It has been our observation that when trails are non-existent, 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 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:

a) Alternative 4 is less complicated than the other three alternatives 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 of us who are often frequent the Class II areas defined in the DEIS, know that they provide outstanding opportunities for solitude and unconfined recreation and require a remarkable degree of self-reliance.

d) Alternative 4 calls for less Class III space. Some Class III areas have been so abused they are no longer meet acceptable wilderness standards. We submit that these areas should be restored through sound administrative practices such as reduced public access and mandatory education for 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 chosen, 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 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 group, 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 Dave Howells at (801) 782-4935.

Respectfully Submitted By,
High Uinta Back Country Horsemen

Author By,
Dave Howells, President of Board of Directors
Back Country Horsemen of Utah

(2f) 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 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.

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 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).
Ashley and Wasatch-Cache National Forests
355 North Vernal Avenue
Vernal, UT 84078

Attn: Bert Kulesza, Supervisor, Ashley National Forest
Bernie Wiegardt, Supervisor, Wasatch-Cache National Forest

Dear Sirs:

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 really necessary tends to complicate matters, multiply problems, and diminish the effectiveness of the plan.

Considering the apparent budgetary constraints now facing the Forest Service it appears to us that the proposed management plan is 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 make the management plan so complex that it unnecessarily diminishes the opportunity for people to share and enjoy the wilderness.

Not too long ago the Ashley and Wasatch-Cache Forests each had different user group size 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 261.58(f). The numerical limit itself, however, is not so much an issue as is the amount of abuse inflicted on the environment by uninformed or careless users and their animals. One horse, improperly cared for, can do more damage than 15 animals prudently handled by knowledgeable and conscientious 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.

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 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 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 in its stead for the following reasons.

a. Alternative 4 is less complicated than the other three alternatives 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 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.

d. Alternative 4 calls for less Class III space. Some Class III areas have been so abused they no longer meet acceptable wilderness standards. We submit that these areas should be restored through sound administrative practices such as reduced public access and mandatory education for 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 the process of elimination. We sincerely hope this is not the case. There is a better way. Education! Regardless of the alternative chosen, 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 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) 782-4956.

Sincerely,

[Signature]

David P. Howells
President of the Board of Directors

cc: R-4 Regional Forester
Gayne Sears
Julie Hubbard
Mylon Filkins, DVM
Sen. R. Scott Bennett
Sen. Orrin G. Hatch
Rep. Jim Hansen
Rep. Bill Orton
Rep. Enid Greene
All members of BCHU Board of Directors
MESSAGE DISPLY FOR GAYNE SEARS

To gayne

From: Julie Hubbard<RO4F19A>
Postmark: Aug 09, 96 11:28 AM
Delivered: Aug 09, 96 11:29 AM

Subject: Forwarded: Reply to: Comment on HWZ DEIS

Comments:

From: Julie Hubbard<RO4F19A>
Date: Aug 05, 96 11:28 AM

FYI:

Previous comments:

From: Bert Kulesza<RO4FO1A>
Date: Aug 02, 96 5:00 PM

Thanks Julie. I got a call from Jack Prescott today too. He expressed similar concerns especially the 7 horse limit in Class I areas. Said he and 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 loop. Bert

Message:

From: Julie Hubbard<RO4F19A>
Date: Aug 02, 96 4:30 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 LAC process. Jack Prescott was especially angry.

[1] Concern was limit of 7 horses in a group in Class I areas.

I explained this is 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 these 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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Note: 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 assess this desired condition (pg 7-15). 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.
I encourage you to carefully consider the
agents under scrutiny for Class I ranking. I feel there are agents deserving of this
'least human influenced' classification which
have been ranked otherwise.

Whether people agree or disagree with wilderness
designation, once so designated, it should be
managed as true to wilderness ideals as possible.

Please do not send mailings directly to me. I
will follow decisions through Osha's Public
Comments.

Thank you, sincerely,

Judith Butler

(3a) Noted. Refer to the Record of Decision for the rationale of the final
decision.
Dear Mr. Kulcsa,

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. Let's not make the plan so complex that it unnecessarily diminishes the opportunity for people to enjoy the wilderness. Appropriate limits on use must be established in order to preserve the wilderness experience, but wherever possible education should be the preferred method of managing use impacts.

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.

3. Regardless of which alternative is selected, I believe a well-developed 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 help prevent resource damage and improve the opportunity for people to enjoy the wilderness.

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.

I appreciate 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
Member BCHU
Sept 11, 1984

Douglas Chinn
2222 East Lyndon Drive
Salt Lake City, Utah 84109-1214

Dear Mr. Kulesza:

I am writing to express my concerns about the Draft EIS for the High Uintas Wilderness. The range needs to have the maximum amount of land designated as Class I. It is disturbing every time I go to the Uintas to find the land desecrated by cattle. Cattle are being driven everywhere and streams turned into mud puddles. In addition, the damage done by campers is appalling.

WILDERNESS is the key for maximizing commercial value, the cattlemen, and the non-profit outfitters. I am writing to express my concerns about the Draft EIS.

Non-native species should not be introduced. Bringing in new species will only cause problems, and move the mountain range that much farther from its natural state. Look at the problems caused by foreign plants (rubberweeds, cheat grass, kudzu, tamarisk), foreign birds (starlings), and foreign animals (tule trout in Yellowstone) to see just a few examples of man's good intentions gone wrong.

Class I areas should include all ungrazed land in the mountains, and all Class II watersheds areas need to be managed for the native species. I support the proposed Colorado Cutthroat Trout Refuge. Grazing needs to be reduced over time to make sure that the big animals - ungulates and their predators have good habitat. And finally, restrictions need to be placed on human activity such as no fires and limited horse entry. The Draft EIS needs work to ensure that the Uintas stay as wilderness for a long time to come.

Sincerely,

[Signature]

(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 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.

Part 1: Condition Class: Some areas not grazed and not in Class 1 do not have Class 1 values for reasons other than grazing. Designation of Class II is intended to facilitate management of the High Uintas Wilderness in the following ways:

1. It recognizes a historic pattern of use close to trails where the majority of users are first time or infrequent visitors and 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 diversify much of the above group from Class I and Class II areas which will facilitate solitude in these areas.

3. It provides an opportunity (though 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 issues 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.

Part 2: 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 fish and wildlife in the national forests in Utah." This wording is supported in the Wilderness Act of 1984. 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 UDWK as explained on page 1-12.

Part 3: Livestock Grazing: Congressional Grazing Guidelines for wilderness include "There shall be no obligation 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.

Part 4: Restrictions on Human Activity: Implementation of desired conditions, indicators and standards (pg 3-2 through 3-17) addresses the need for restrictions on human activities (i.e. no fires and limited grazing of pack stock) if native species begin to show a decline from the limit of acceptable change.
Dear Mr. Kuboza,

I read the summary of the Draft Environmental Impact Statement of the High Uintas Wilderness. I'm glad that Alternative I is the preferred way to manage it. It pretty well covers the basic need to protect the wilderness and also enjoy it. I wish there was also a way to keep out predator control in a wilderness land. It doesn't seem fair that some animals have to die because of the sheep that are eating our wild lands, National Parks, maybe in the future? The forest service and the BLM will get together and stop coyotes and other unusual predators from doing evil. The High Uintas Wilderness would be a sanctuary for all that steps foot and dwell in it.

Sincerely,
Jack Howard

6a/Preference for Alternative I 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 snare, traps, dogs, or shooting. Aerial gunning, M-44's, and "drenching" are not allowed in wilderness.
(7a) The presence of sheep in the wilderness is a concern and is objectionable to some wilderness users. Effects of sheep grazing on 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.
CONTACT FORM

Date: 8/19/94
Role of Document: HOW DEIS
Name of Project Coordinator: ____________________________
Name: Sony Overy
Phone: ____________________________
Comments: - describe Alt 5 better - why no lines? what is no action (write on map)
 Attachments: Yes ______ No ______
 How many? ____________________________
Location: ____________________________
Name and signature of Person Taking
Comments: ____________________________
Signature of Person Commenting: ____________________________
(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) (A) 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) (3), 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.
(9c) We recognize that to some people any human presence or trace in the wilderness seems unacceptable. Undeveloped by man in a phrase used in the Wilderness Act of 1964. The interpretation of unoccupied land 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 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 picturesque 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.

Name and signature of Person Taking
Comments: ____________________________
Signature of Person Commenting: ____________________________

Date: ____________________________
Title of Document: ____________________________
Name of Project Coordinator: ____________________________
Name: ____________________________
Address: ____________________________
Phone: ____________________________
Comments: ____________________________
213 East Gordon Lane #30
Salt Lake City, Utah 84107

15 September, 1996

Bert Kulesza, Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal, Utah 84067

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR MANAGEMENT OF THE HIGH UINTAS

Mr. Kulesza,

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 is only an amendment to the vaguely worded Wasatch-Cache and Ashley
forest plans.

Within the limited context of the LAC decision, I support Alternative A, the alternative
submitted by the Utah Wilderness Association. This would put 40% of the HUW in Class
I, 58% in Class II and 2% in Class III. The ungrazed portions of the wilderness would all
be zoned Class I, including Naturalist Basin, Grandaddy Basin, Four Lakes Basin, Squaw
Basin East Basin, Amethyst Basin, the Uinta River, the middle reaches of the Yellowstone
River and part of Beaver Creek.

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. Stanley 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 most or exceed the intent of the Wilderness Act 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 the 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 support 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 Guide Lines). 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.

"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 "wild" 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 wilderness 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.

**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.

**Principle 3:** Manage Wilderness and sites within, under a nondegradation concept.

"Basically, the nondegradation concept calls for the maintenance of existing environmental conditions or if they equal or exceed minimum standards, and for the restoration of conditions which are below minimum levels."

The DEIS presents only the skinniest 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 LAI 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.

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.

Program, other than to integrate it with the vegetation and soil standards. The allotment management plan is in 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 ensure that wilderness values are protected when ADC activities take place.

**10d.** 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 Uinta 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 impact of man's work substantially unnoticeable. It gives direction for management that will provide for opportunities for solitude or a primitive and unconfounded 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 resources. 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 continuance 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 impact 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. 

In the book Sagebrush Country, published in 1989, Philip Fradkin wrote this description of the HWU:

The Forest Service does not require wilderness permits, as it does elsewhere in areas of similar heavy use. Not does it ration use. Other Forest Service wilderness areas are rationed 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 least in Class I areas. Restrictions ought to be placed on commercial outfitters and guides.

The transportation of pets and livestock is considered a potential problem. Snowmobiles, snowshoes, and snowmobile-drawn sleds would be restricted as well. The issue is not addressed in the analysis.

**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 primum mobile attributes of wilderness that human benefits are derived:

- attempts to facilitate wilderness enjoyment by improving access to make visitation easier,
- more convenient, or simultaneously accessible to an unacceptable number of people can ultimately diminish its unique benefits.

A plan emphasizing the unique benefits of wilderness as opposed to other backcountry would take a holistic approach that goes beyond the recreation focus inherent in LAC. Wilderness preservation must be the overriding value--if not in the HWU, then where?

**Principle 6: Favor wilderness-dependent activities.**

"Activities that are not wilderness dependent can be enjoyed in many alternative settings, but wilderness-dependent ones cannot. Thus, most conflicts should be resolved in favor of wilderness-dependent uses."

For example, put-and-take fishing is not a wilderness-dependent activity. It should be phased out in favor of fishing for indigenous fish species.

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 HWU 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 HWU 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 1D 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 HWU." (HWU 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 does not 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.)

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 most minimal discussion of regulations and visitor education activities, existing or proposed.)

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").

"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 on the condition class designation. However there is no tolerance for conditions 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 user 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.

(10m) 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 e-fit, 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.
As things stand now, the Forest Service is not open to meaningful and effective public involvement. 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.

Principle 13: Manage wilderness in coordination with management of adjacent lands.

The timber management policies of the Ashley and Wasatch-Cache have been characterized by massive over-harvesting and invasion of roadless land. Since 1983, 26,000 roadless acres have been lost to the timber program in the Uintas. The Forest Service has seriously contemplated clearcutting right to the wilderness boundary, in the 1980s Gilbert Creek timber sale and most recently in the Round Park/Lost Creek “salvage” timber sale scoping process. The Wasatch-Cache has actively promoted a road, now partially built, up the Main Fork almost to the wilderness boundary for oil and gas development and to open up this drainage to future timber sales.

"Simply put, wilderness does not exist in a vacuum—what goes on outside of but adjacent to a wilderness can have substantial impacts inside its boundary...Managers planning the allocation of 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.

Sincerely,

Richard 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 had management concerns that need to be addressed individually. Some flexibility in choosing management actions need to be available to the wilderness managers.

(10q) 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 Gianettino 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.

(10q) 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

Date __3-21-96________________

Title of Document: PEIS for management of Pine High Vistas

Name of Project Coordinator: ________________________________

Name: Richard M. Warnick

Address: 213 E Gordon Lane #50 SLC UT 84107

Phone: 801-268-9110

Comments: I'll put my substantive comments in a letter. But I am unhappy with the PEIS because it is not what I would call a wilderness management plan. A better plan amendment is a minimal effort. And not enough after 12 years of waiting for a plan.

Attachments: Yes ______ No ________

How many? ____________________________

Location: ________________________________

Name and signature of Person Taking

Comments: ________________________________

Signature of Person Commenting: Richard M. Warnick
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. 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 distance as if they encountered livestock and still have their desired solitude.

Whatever map is produced in the final EIS should be a working map for management decisions and not 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.

**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

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(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 travelling in pristine areas. 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.
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.

**SPECIES IN WILDERNESS**

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.

**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.

Thank you of allowing me to comment on the document. In general, I think it is a good document.

Sincerely,

*Albert W. Collotz*

Albert W. Collotz
Rt 1 Box 1597
Roosevelt, UT 84066
801-722-0263
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.

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.

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 finite 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. Regulations 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.
To Bert Kulesza
Forest Supervisor
Apostle National Forest
255 N Vernal Ave
Vernal, UT 84078

Subject: The Summary of the Draft Environmental Impact Statement

Dear Bert Kulesza,

I have read the summary and would agree that alternative number 3 would do a good job in managing the High Uintas Wilderness area, but I do think that number 3 would do a better job in preserving the High Uintas. I thank you for giving me a chance to have a voice in how the High Uintas wilderness is managed.

I was one member of the huge crowd that crossed the Uinta Range in 1970, and I am just as concerned about this awesome place in Utah. If you could please send me information about this issue, I would...
appreciate it. Thank you for your time. Sincerely, Lance Parry
130 & Viewpoint Dr. Apt 6 807
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.

I would like to see increased Class I areas and decreased Class II and III areas. I would welcome increased regulation.

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.
Dear Mr. Kulesza,

I write to respond to the High Uintas Management Plan. In particular, I wish to recommend that "Alternative 3" submitted earlier by the Utah Wilderness Association, be considered and accepted.

First, I would recommend active restoration to re-create "Class I" areas across the entire range. The High Uintas are a national treasure. Grazing simply must be phased out as soon as possible. Grazing is the single most degrading use of the range. (I can and do tell horror stories of beautiful areas like Henry's Fork Basin, trampled to dust by thousands of sheep.)

Grazing should be phased out, and every 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.

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.

Sincerely,

Thomas J. Lyon
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.

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.

I would like to suggest that Class I needs a larger group size and overnight stays increased. Such small values will tend to put more pressure on classes II and III when groups are larger or wish to stay longer than your proposed limits. Group size in particular a problem because it was not long ago that the Ashley and Wasatch/Cache forests adopted the Special Order 36 CFR 261.58 (f) 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 organization 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.

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.

Sincerely,
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 is complex and cannot be performed all at once. But, the preferred alternative establishes the framework 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 I noted

(16c) According to the literature (Cole, 1989), popular guide books (Davis and Veranth, 1994) 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 (pp 215). If and when through monitoring this standard is exceeded, management actions to restrict group size in Class I will be adopted. Research also suggests it is important that previously unused sites are not used for too many nights in a row. If they are, damage will be evident and further use is likely to be attracted to the site (Cole, 1989)

(16d) 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 (pp 215). 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.

(16e) Preference for Alternative I noted
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 is a salmon run 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 ocean-going 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 DWRC, 789-3103.

If you'd like to visit Sheep Creek as part of a Mountain Club group, call Linda West, 789-4313. Departure time and optional activities (touring the Sheep Creek Geological Area, for instance) will be decided by consensus.

Ruby-Horsethief Float
Friday-Sunday, Sept. 27-29
Have you ever had it with the 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 and Fridays, 6:00 p.m. Leave from Altitude Cycle, 510 East Main (781-2959). 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 ride with). Call Craig Merrell, 6745, for more information.

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 I 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 impact is at a minimum, ecological processes operate without human impact, grazing is banned, and lakes cannot be stocked with non-native fish. Alternative I 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% of the High Uintas Wilderness as Continued on page 4
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 1 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 (or any other species) always create problems for the existing native species and the balance of the ecosystem. The Russian olives introduced into the Uinta Basin as pest-oil food for livestock don't seem to be helping 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 is 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 horses, 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 1 of the High Uintas Draft EIS. Ask for Class I management areas to include all ungrazed portions of the Uinta. 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 big horn 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 Natural Resources Committee.

—Stephen Burton

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 discussions 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 roadside areas, float the rivers, and climb the mountains. When that time 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 ill 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, non toxic 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 education 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.

(17c) 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 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 discussions for the purpose of identifying a common ground in an MOU with the State to deal with the fish stocking issue. The State is looking more strongly at an irrigated fishery and will implement where feasible.

(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 an 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.
### CONTACT FORM

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**Comments:**

**Signature of Person Commenting:**

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(18a) After reviewing comments on the DERS, we have added Class III areas as generally appropriate for outflung activities also. Due to existing high use and social conditions on the verge of encroaching standards, specific areas in Class III (identified in the chart on page 2-18) will remain closed (no permits issued) to outflung. On a broad scale, if managers ever impose a quota on the number of visitors to the HWU, both the outflung and non-outflung public will share the encumbrance.

(18b) The outlining 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).
Outfitter fears definition of wilderness excludes horses

As an outfitter in Utah County, I believe that if alternative routes in the Draft Environmental Impact Statement for the Proclamation of the High Cliffs Wilderness are adopted, guided horse trips will be destroyed.

"The Draft Environmental Impact Statement for the Proclamation of the High Cliffs Wilderness is a document that has been developed in response to the need for a new management plan for the area. It includes an analysis of the potential impacts of the proposed management plan and provides information on the alternatives considered.

The High Cliffs Wilderness is a unique and special area that is important for its natural and cultural resources. The proposed management plan for the area includes a provision for the development of wilderness areas, which is consistent with the goals of the Wilderness Act of 1964.

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Fears of the touted alternative routes in the DEIS will crush the economic viability of the business," Jones said.

Jones is calling for 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.

Recreational users, visitors, prosecutors, and others are wonder how they will be charged if they will be charged at the Flaming Gorge National Recreation Area as freely as in the past.

The Flaming Gorge National Recreation Area has been managed to implement an entrance fee on a local basis. That implementation will be of some benefit to the area as 80 percent of the necessary collected only in the Ashley National Forest to support wildlife.

There will be an entrance station to the recreation area, but rather an area pass issued through a network of vendors. The pass will provide the user an opportunity to use facilities at Flaming Gorge.

There will be a few, quiet, 4-wheel- and 4-wheelers.

The meeting will be held Tuesday evening at the Laramie County Courtroom.

(19) article responded to in letter #1
September 12, 1996

Bert Kalesza  
Forestry 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 Uintas Wilderness Management Plan.  

As you may know, UMC was in on the ground floor of the Limits of Acceptable Change process.  Our representatives attended just about every meeting in the Heber City tabernacle 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 cold 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.

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.”
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.

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.

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 Prong 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 streams 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 wilderness 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.

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 shall 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.

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..." 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 Wilderness 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 tied to the High Uintas Wilderness Management Plan and its goals and guidelines for what a wilderness should be.

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. Itducksthe real issue of where and what kind of grazing we want in the High Uintas Wilderness. To compartmentalize or fragment 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.

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.

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 expectation of managing wilderness for all resource values, rather than just recreation (desired condition statements), and a strong commitment to manage the HUW across NF boundaries and as a single unit (Record of Decision).

(20f) As an amendment to the Forest Plan, direction in this document regarding ground cover standards will be consulted and adhered to when Allotment Management plans are revised.

(20g) We appreciate your observations of the condition of resources in the Right Hand Fork portion of the East Fork Bear River cattle allotment. We believe your point is that existing resource conditions do not meet the standards for any of the 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 persist in grazing allotments, irrespective of where 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 courses of 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 (ie. suitable camping areas being full of cows), although no 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 plan. 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 in the Ashley and Wasatch Cache Forest Plans through the provisions 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 area should have Class III areas. These areas are not even remotely "primeval," and the recreational experience found in them can be readily 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," "untrammeled" quality of the area. A lot of people having fun in close proximity, surrounded by beautiful scenery, is not 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 "Go-up 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 (minuses motorized vehicles), with large groups, lots of fire rings, toilet tissue middens, denuded campsites and inappropriate pack stock use, we will have defacto non-wilderness within designated wilderness areas.

One important change in management would be to begin to permit the most popular areas. Permits could include restrictions for smaller group size, strictly enforced, plus a requirement for backpack stoves in heavily-used areas where live trees have been chopped down 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 will need less restrictions to manage the surge of humankind. It's the way the world is going. Allowing 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 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. That would be wilderness worth having.

"Shareholders" 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

(20) 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.

(20) 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. Increased 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.

(20) Management actions run along a continuum from the benign, i.e., assign, 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.

(20) 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 Act and will protect all HUC 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 compromise.

But wilderness management should not so much be a compromise as an attempt to adhere to the basic concept and ideals of what a wilderness should be: primeval, untrammeled, 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.

It is a galling irony of our time that many areas outside of designated wilderness have more wilderness, 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 camping 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.

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.

(20m)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 foregoing conclusion that the animals would migrate from the transplant 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 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?

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 curae 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 UDFR 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 transplants 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?  

(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 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.

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.

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 master at public relations; it should be able to placate UDWR while standing firm to protect indigenous species and their habitats from predation 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.

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...
The issue of non-indigenous transplants must be broached and resolved.

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 predators 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 doesn't belong in the High Uintas Wilderness--Dromedary Oryx americana.

How about setting a goal in the High Uintas Wilderness management Plan of restoring 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 location 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 consumption 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, money or personnel. If the effect of this foreign animal is studied appropriately, it will take more
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 abusers—shut down, but that's just wishful thinking.)

**Desired Condition Classes**

The Uintah Mountain Club prefers, and strongly urges you to implement, Alternative

3. 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, inaudibility, 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!

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.)
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 reversibly, 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.

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.

We should point out that there are inconsistencies with the designation of class boundaries between alternatives.

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.

Question: If you are willing to make the West Fork of Gilbert Creek 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?

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.

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
Alternative I. You should strive for a higher level of purity than now exists. A commitment to restore Naturalist Basin is not enough. Think big!

We strongly feel that all unengrazed portions of the High Uintas should have Class I standards.

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.

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.

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.

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 forbe and amphibian populations would be an important first step.

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.

We support Alternative I 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 I. Alternative I is not a bold, visionary course for this flagship wilderness.

We hope that you will agree that this draft EIS needs quite a bit of work before a strong, energetic, visionary document emerges as the High Uintas Wilderness Management Plan.

Best regards,

Will Durant
Chairman, Natural Resources Committee

(20k) 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.

(20j) As an amendment to the Forest Plans, direction in this document regarding vegetation standards will be consulted and adhered to when Allotment Management plans are revised.

(20k) 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 reintroduction of indigenous species.

(20i) 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.

(20n) 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, responsibilities for implementation and enforcement.

(20m) 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.

(20o) Preference for Alternative 3 noted.

(20p) Non-support for Alternative I is noted.
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 Uinta 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."

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.

I see on page 3-19 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?

Not too long ago 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
people that formed the I. 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 326 FR 261 58 (f) There were many different user groups that agreed on these numbers I understand the desire to make smaller groups for class II there are some reasons I believe the number should remain the same throughout the wilderness.

1 The Forest Service can not tell you what the average group size for recreational horse users is now So why arbitrarily pick the number 7
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
3 Using only these numbers that will only allow 4 people in a class I area
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 is ok you will have someone trying to tell people they are not legal which will just cause problems to one needs
6 With the limited budget the Forest Service is now receiving, field observation will be greatly reduced

After reading and studying the desired conditions of class II and class III it is evident that trails should be designated as class III It is stated in class III desired condition "well developed, maintained and signed trails and visitors, encounters with other groups, targets and wilderness ranger's camps are common. Conditions that result in user conflicts are expected"

Trails are an integral 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 man's 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 Kamans 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
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 stocked." Almost every lake in East Basin is now stocked. There are few if any trails, with the 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.

2. There is an area just south of Anderson Lake along the USFS trail 121 to the pass going 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 trails going through it. Most of the lakes are stock. 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 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 Nerice and Priord Lakes should be a class II. This area does not exceed the standard for campsites 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 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 II. Would it be practical to change the two class II areas one way of the other? This might be less confusing for the wilderness users if it will be difficult to manage the class I in this area with so much class III 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 regulations there were, 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
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
P.O. Box 486
Kamas, UT 84036

cc Bernie Weingardt
Joseph Bistryski
Julie Hubbard
Gyne 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.

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.

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 reviewed 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.
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 south to a tiny coastal town named Yachats (Ya•hach). 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 claim 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 Uinta Wilderness.

Before I give you my "official comment" concerning the High Uinta 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 Wangerzard, 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 23a unerazed sections of the High Uinta including the western end of the 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.

Concerning fishery management please make sure all Class I watersheds be managed for native aquatic species Phase out the non-native recreational fisheries. I support the Yellowstone River Colorado Cutthroat Trout Refuge proposed by UWA.

I suggest grazing in the wilderness be phased out during the next ten to twenty years to assure a safe environment for bighorn sheep and predators.

I believe now is the time for the Forest Service to do their job and consider the UWA's wilderness resource as the most important value when managing this incredible, irreplaceable and wild place.

Sincerely, Erica Wangerzard, 5520 S. Roger Dr., SLC, Ut. 84124

Eric Wangerzard
440 Meadows Way  
Grand Junction, CO 81503-2525

September 5, 1996

Julie Hubbard  
8236 Federal Building  
1255 South State Street  
Salt Lake City UT 84118

Dear Julie:

Thanks for the opportunity to review the DEIS for the High Uintas Wilderness. I am glad to see the Forests moving on to get this task done 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. We must continue to reach for a high standard of wilderness protection and management.

I found the description of the alternatives and management direction for other than Alt. 5 lacking. The Alternative section of the NEPA analysis is to be the heart of the document. There certainly is not much in this document. Alternative I is described as maintaining current conditions.... Alternative 3 is designed to maximize pristine character of the wilderness. Both then describe maximum service days for outfitted use. There is much more to wilderness management than outfitter use or a statement of acres of "opportunity!"

Also, the title of the document states "High Uintas Forest Plan Amendment." Each alternative should contain the Forest Plan amendment which will be incorporated into the Forest Plan.

It would seem the desired condition classes can be varied through various management practices. Trails now maintained can be less maintained or not maintained at all. As grazing allotments become vacant, these areas can go from Class II to Class I, etc. Although fish stocking can be a criterion for Class I areas, there certainly is a big difference between an area which has some fish stocking and an area which has cattle grazing.

The Classes are listed as DESIRED. To me this means this is where we want to head. Class II areas can move to Class I. Class III areas will not likely changed since these are often the travel corridors and high use areas; however, camping in these areas can be limited, open fires not permitted, overnight stock use only in designated areas, etc. There are many management practices which can reduce the impact of human influences. The document states this but does not get specific (p.4-27).

For example, the Henry's Fork is described on pages 3-27 & 28. In it is described "Finding solitude and a quality wilderness experience is quite difficult.... The drainage is very popular for Boy Scout groups." The next paragraph says "Rules or regulations ... so far have not been developed. However, fire closures above Elk horn Crossing are being considered..." under
this plan, they should be considered under various alternatives. Likewise, groups like the Boy Scouts can be directed elsewhere and the area closed to these kinds of groups. I could not find this kind of direction in the proposal and the alternatives. By closing the area to open campfires, even by outfitters, use may drop or at least finding a quality wilderness experience will increase.

Alternative 3 reduces outfitting, both stock and non-stock. One can still have a pristine environment with outfitting but the conflict may be where the outfitting occurs. In directing outfitting to camps away from popular lakes or trails, impacts are reduced. Also, there is a big difference in impacts from horse stock and the use of llamas or the use of 10 head of stock and 20 head.

I understand there has been considerable conflict regarding stocking of lakes and the use of non-native species. It too, often make fishing my primary activity in wilderness but I am more than willing to have some lakes non-stocked and prefer native fish to non-native, even if I have a hard time catching them. Wildernesses are not just recreation areas so there should be some areas non-stocked.

Already mentioned is the lack of direction for each alternative. I also find a lack of direction with regard to monitoring the indicators and standards. Pages 2-9 through 2-17 have the standards but what is the direction once the standard is reached or exceeded? If deadwood becomes scarce due to campfire use, will a closure be implemented? Restrictions may not be needed now, but through monitoring, they may be needed in the future. This direction should be indicated.

I know a great deal of work has gone into this plan but I personally have a hard time understanding just what will be happening. There are problem areas now but little indication of what will be done to resolve the issues. The "Monster truck" trail described for the Duesene River (p. 3-20) indicates a major problem. But, there is no corresponding action to mitigate or reduce the impact. Stream crossings are mentioned as being badly eroded for use. Maybe this is an area where small bridges are needed as a tradeoff to reduce the erosion.

Maybe I am missing the overall picture but I feel more work needs to be done on this plan to give it the direction needed as a Forest Plan Amendment.

Sincerely,

[Signature]

David R. W. Hoefer
Comments on the High Uinta Forest Plan Amendment

In Response to New Concern

At the recent open house at Roosevelt I noticed my concerns about the draft and some of the things it contains. My range of knowledge in this area is limited to only a small section of the total wilderness, but I hope some of these hold true for the complete area. These

Concerns are:

1. Guides and Outfitters. It seems to me that this whole proposal was written by Outfitters. If what I am reading holds true most of it is not all of the class II areas are designed to be used by commercial outfitters. My examples are:

   - In Grand Lake on the Uinta River drainage with a permanent camp set there by the U Bar and moving to camp a 1/2 mile away if leaves one with a very minimal camping area with only enough for setting up camp. As mentioned above an additional 1/2 miles west to the next camping area that has suitable feed and a long hike back for any fishing.
   - Fox Basin in particular used tent which had traditionally had a permanent camp on the west shore could fall under class 1 in proposal 1, therefore if some one is camped then you must stay at Fox which is class III or move a mile about into camp.

   I could I seen nothing in the whole proposal that dealt with this one user of the wilderness that does more damage than any other.

   You list classifications and possible limitations for use but do little to address these problems. If all who use the wilderness adhered to the same use concept we would have less problems. I would therefore suspect that any use or plan to use these areas be mandated to affect a user of this nature.

Pros and Cons:

In reviewing the proposal I feel clean more power proposal #3 as a horse user it gives a real opportunity to camp more for free, but my second choice would be #2 whichever would be nearer at this point.

I just completed a hike on the Wilderness from #30 to 4 on Sept 22 and we used the new proposal #1 and the guidelines in it. We intended to camp in a class II area but it was already taken by a outfitter. We then had to move into a class II area and had to move our camp after 2 nights. This made us move camp 3 times while there and it is very frustrating process. If any of you have hunted in horses in the wilderness you would realize the problems you encounter. You have to go extra precautions there needs to be at least 1 packhorse per hunter so carrying my gear out also the animals needed for a camp I have had horse and archery hunting outfitters are definitely out so you want pack hares a lot. All in all I have found the minimum amount of users per person to be 2 so is forced to camp in a class I area and to satisfy #3 is the best hunters that could go into an area.

As could be caused here we wanted we have found it no problem but when we don't. I suggest a clause that under certain circumstances we can tell the outfitter to send the rules.

Secondly I feel the classifications are a good idea.

My suggestions would be more miniature education a clamp down on outfitters and does not only on days but on areas they can use and a better trail system keeping them clean and usable. Before any public use be

(25a)Re:ponse 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 Uinta
stock outfitter. Part 2: For this analysis, organized group recreation (ie Boy
Scouts) in the HUW makes up a large percentage of overall wilderness recreation
use. These groups have been and are targeted for intensive wilderness education
and Leave No Trace training. In areas like Grand Teton and East Fork Bear
River, the Forest Service is seeing positive changes in camping practices and
wilderness behavior.

(25b) Programs directed at specific user groups are certainly viable management
actions. Scouting service projects incorporate Leave No Trace ethics and techniques.
Emphasis has been directed at the scouting organizations from many different levels.
Efforts are being aimed at recruiting scouts to perform service and a considerable
amount of effort in trail maintenance and campsite clean up was volunteered by
the scouts in 1996.

(25c) Much work is needed to teach leave no trace concepts. This work can be
accomplished by volunteers in their community or civic organizations. It would be
cost prohibitive to mandate attendance and implement enforcement.

(25d) Preference for Alternatives 4 and/or 1 noted.

(25e) According to the literature (Cole, 1989), popular guide books (Davis and Versaw,
1993) and Leave No Trace publications (Harnan, 1994), in more pristine areas large
groups can cause greater resource impacts. The Class I desired condition description
challenges groups that 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.

(25f) We appreciate your endorsement of the desired condition class management system
for the HUW. 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. Outfitters will
continue to be an important part of providing service for the public, as well as meeting
wilderness management objectives like clearing trails and providing wilderness education.
Both the general and outfitted public will be held responsible to visit Class I smaller
limited outfitter days should be limited. The wilderness belongs to all of us and those that have social needs in at risk youth, disabled, urban dwellers, etc. I would add to your list those that have money enough to have things catered to these. Part of this proposal is set in that direction to serve if you have enough funds you can enjoy the wilderness if you do not you are out of luck.

Thank You
Ralph Duncan
Ut 1 Box 1357
Roosevelt Ut 84066
home 353-4702
work 762-5648

Managers, managing the HUW using a class system will enable managers to focus on needed trail maintenance more effectively.

(25g)In 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 encumbrane.
September 16, 1996

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 S Vernal Ave.
Vernal, UT 84078

Dear Bert:

We're 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 citizen task force. I've personally traveled extensively through the HUW, served on the LAC task force, and have actively participated in High Uintas issues since the late 1970's. Our president was a South Slope district ranger in the late-30's and early-40's. I encourage you to review our extensive input as support for the brief comments here. We won't bother restating all we've said in the past in large part because after reviewing the EIS we're convinced it would be a waste of time.

Five years of planning, tens of thousands of dollars, dozens of LAC meetings, and hundreds if not thousands of hours of citizen input have led to a remarkable decision to maintain the status quo. When Gary MacFarlane, one of the most knowledgeable and dedicated High Uintas Wilderness advocates, resigned from the citizens' task force in 1992, he wrote at the time the LAC process was being used to "justify the status quo." Wasatch-Cache Supervisor Susan Gianettino responded that "nothing could be less true." The draft EIS validates Gary's concern and is making a fair out of Susan. Of course, she's not making the decision, but the lack of continuity and consistency within the agency renders years of public input and High Uintas Wilderness advocacy irrelevant. We note that the "list of preparers" includes only two Forest Service employees who were active with the past 5-10 years of citizen involvement. Perhaps that's why the recommended course of action doesn't reflect the concerns that have been raised relative to High Uintas Wilderness management.

An any familiar with the Uintas has witnessed the overgrazing in the West Fork Blacks Fork and the devastation across the North Slope along the sheep driveway, counted the hundreds of campsite and campfire scars in Granddaddy Basin, knows all the major carniwore are gone or nearly so, knows the native fish have been replaced by exotic species, knows the biologically rich but fishless lakes are being managed as sport fisheries and knows the fire management plan adopts the long-since discredited "out by 10 o'clock" policy. It's hard to get enthused about a plan that maintains this status quo. It's also hard to imagine that this is the vision the fathers of the Wilderness system had in mind.

Several key issues have been ignored in the DEIS, thus even if the Forest Service selects the most protective alternative it will do little to improve or even maintain existing wilderness conditions. Fire management, fish stocking, livestock grazing and predator control are major influences 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, primeval 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 introductions, indigenous species recovery, and habitat), and the interplay of all of these values

(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 1900'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 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 assure that wilderness values are protected when ADC activities take place.
PRINCIPLE 2: MANAGE WILDERNESS AS A COMPOSITE RESOURCE, NOT AS SEPARATE PARTS.

From a management standpoint, one important attribute of the wilderness resource is the natural relationship among all its ecosystem parts: vegetation, water, forage, wildlife, and geology. Wilderness is a composite resource with interrelated parts, and its management must be focused on the whole, not on those component parts. For wilderness, therefore, 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.


In the High Uintas, the Forest Service is letting local politics rather than professional wilderness management drive the planning process. Wilderness doesn't have a chance.

Alternative 1 misrepresents the existing condition for the ungrazed lands in Boundary Creek and from the West Fork Beetle Creek east to the Wilderness boundary. Both of these areas currently fall within Desired Condition Class I; they show no more human impacts than other Class I areas and both are within vacant grazing allotments. Managing them as Class II contradicts Forest Service policy to "manage Wilderness toward attaining the highest level of purity in Wilderness within legal constraints.” Alternative 1 allows these areas to degrade to Class II standards.

Class I areas should include all of the ungrazed areas in the wilderness including the areas described above and Grandtadley Basin, Naturalist Basin, Four Lakes Basin, Squaw/East Basin, Amethyst Basin, Uinta River, and the ungrazed Yellowstone River.

With respect to commercial outfitter guiding and guiding, it's important to connect the “needs” analysis to the analysis of the EIS and either of those to the proposed action. The “needs” analysis correctly notes that market-generated demand does not constitute a public need. The EIS shows that average use (really maximum market demand since most outfitters aren't using their allocation) is 582 stock-use service days and 1,388 non-stock service days. But the proposed action is to dramatically increase stock-use service days by 300% percent and non-stock service days by nearly 200 percent! The only justification is that outfitters expect demand to increase. How does this tie-back to need, and the idea that need is not market driven? The Wilderness Act generally prohibits commercial activity in wilderness for obvious reasons. The DEIS, to the contrary, encourages a significant increase in commercial use.

The DEIS describes the government regulators (Forest Service) and the regulated industry (outfitters) as "partners." It's more like collusion. Partners look out for each other's interest. The Forest Service should be a "partner" of wilderness looking out for its interest, not the interest of the outfitting industry. We don't know how else to explain why at a time when wilderness values are being degraded and management/monitoring funds are declining, the Forest Service is promoting a many-fold increase in commercial service days. The DEIS attempts to evade what is really occurring 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 decision makers can appreciate the incredible increase in commercial use that has occurred. Outfitters should not be allowed to occupy any site longer than the 14-day limit that applies to all other users. We're not swayed by the argument that moving campsites will require more work.

Boundary Creek is outside of the scope of this document since it is not Wilderness.

We'll be the first to admit the descriptions are subjective. When we looked at 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.

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 trailheads 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.

Market-generated demand does not constitute a public need. Need is based on protecting the resources while providing for use and enjoyment of the National Forests. The permitting of outfitter/guide is a service for those members of the public that require and do not wish to use outfitter/guide as a means to enjoy the wilderness. Outfitter/guide use is measured in "service days" and is assisted public use. As the human population around the High Uintas Wilderness increases, there will undoubtedly be an increase in both public and assisted public use of the wilderness.

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: 200-700 service days/yr
1982-85: 25-75 service days/yr
rather it's likely to reduce the amount of extraneous equipment that serves to insulate clients from the Wilderness environment. Use limits can control the damage. Lightweight equipment and a commitment to provide a primitive ("wilderness") outdoor experience makes additional stock unnecessary. The DEIS attempts to create two classes of wilderness users—i.e. "partners" and their clients, and the rest of us. It's unacceptable to grant special privileges to commercial outfitters that can't be enjoyed by the general public.

The recreation indicator for campsites diverges from the traditional approach of number of human impact sites per area of land (i.e. # of sites/sq. mi.). What is the rationale for the indicator of occupied sites within a given distance? Please provide our office with the rationale and any research or other literature that discusses this concept so that we can better understand its application. We're concerned that using this indicator its standards would allow for numerous campsites within a close distance as long as they aren't occupied. Encountering human impact sites, even when unoccupied, negatively impacts a wilderness experience.

Campfires should be banned above timberline. There's no analysis that could justify fires in the alpine zone [Ir. campfire scars degrade Class I settings, campstoves should be mandatory and fires should be banned].

We wholeheartedly support the group size standard of 7/7 in Class 1 areas. The same rationale used in the EIS argues for a smaller limit in Class 2 and 3 areas. In fact, nearly all Forest Service publications argue for less. [There's something amiss when educational brochures argue for smaller groups (10 or less) while management plans promote larger groups. We suggest a 10/10 limit for Class 2 and 3.]

There's no justification for keeping the permanent tent platforms that are used by wilderness rangerst, thus we encourage you to remove them. If removal isn't feasible, they should be burned.

There are duplicative trails in almost every South Slope basin that should be removed. Trails should be removed from Class 1 areas unless absolutely essential for resource protection. Risk, challenge, orienteering, primitive skills... these are all values of Wilderness that should be promoted, not diminished by Wilderness management.

Fish stocking and introducing any non-indigenous animal or plant are anathema to Wilderness and should not be allowed in the plan. The Wilderness Act contains a legally adopted definition of Wilderness: "A wilderness is hereby recognized as an area where the earth and its community of life are untrammeled by man..." (emphasis added). How does fish stocking comport with the Wilderness Act? The Forest Service, through this DEIS, is abrogating its wilderness management leadership and legally defined responsibilities.

The DEIS (3-7) should be changed to note that the release of mountain goats was an introduction of a non-indigenous species rather than a reintroduction, which implies they occurred here naturally and were eliminated by human actions.

The discussion of user groups is astounding. The High Uintas planning group has created its own public, supplied these publics with their own set of issues and values, and then, to complete this make-believe analysis, selected the alternative that is the second best choice for these make-believe groups. How convenient. Interesting, though, the proposed action is to manage for the groups least concerned with preserving Wilderness! In the not-so-make-believe world of the High Uintas

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.

(26g) As stated on page 2-19, the standard for outfitted camps is up to one season long camp per drainage (located in Class II) may be assigned to each outfitter. These camps are assigned on a case-by-case basis with District Ranger approval. A District Ranger may approve an assigned camp in cases where its availability will reduce the total amount of stock use (less stock needed to pack camps in and out with each group), where monitoring of the operation is facilitated, or for other reasons. Assigned camps are completely dismantled, removed, inspected and rehabilitated (if necessary) at the end of each season.

The general public is limited to 14 days in the same campsite to deter visitors from occupying unapproved and inappropriate sites for excessive periods of time.

(26h) In order to decrease impacts by excessive stock use (and other concerns), outfitters may request, pay for and be assigned a season long camp if approved by the District Ranger (page 2-17). Assigned camps are completely dismantled, removed and inspected at the end of each season. Except for these camps, outfitters abide by the same regulations as the general public plus additional restrictions contained in their permits.

The general public is limited to 14 days in the same campsite to deter visitors from occupying unapproved and inappropriate sites for excessive periods of time.

(26i) In an attempt to effectively measure solitude within the parameters of current Agency policies (i.e. interviewing Forest visitors is approved only on a case-by-case basis), we have changed the campsite density standard to delete the word "occupied" from the term occupied campsites. With the help of GIS technology, we will sample campsite density and take actions to meet the standards defined on page 2-15.

(26j) At present between 90% and 98% of wilderness visitors travel in group sizes of 10 or less. With this in mind, the desired condition description for Class I has been changed to delete the restriction of 7 people and 7 stock for overnight use. We felt this appropriate 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.
Wilderness Watch

Wilderness, the same groups and agencies that fought against Wilderness designation and apparently lost in 1984 are now being awarded 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

(26a) 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.

(26c) 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 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. 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
P. O. Box 72 – Hyrum, Utah 84319 (801) 245-6747

September 15, 1995

Dear Bert and Bernie,

Please accept these comments on the Draft EIS for Management of the High Uintas Wilderness.

Process/History:

The process/history of this effort is missing in the DEIS and should be part of the analysis. I spent a decade leading the effort to establish the High Uintas Wilderness. In 1998 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. Up until 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 philosophy 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 Shortcourse 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 about 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 environmentalists and suggested their role as government representatives, allowed them more authority on the citizen 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 citizen task force.

As it turned out, late in the process UDWR wrote a scathing letter (February, 1993) to the Forest Service complaining about many of 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 understandable efforts by UDWR, 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.

It is no surprise what those contentious issues were: management of lands adjacent to the wilderness, outfitting and guiding, subsistence fish and wildlife stocking and introduction, and grazing/mangement. Of these disputes, outfitting and guiding was carried forward as an issue. Various excuses were shoved down our collective throats for 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 spot 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
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 Highline trail, where it 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 Untas are where we want them to be.' But, that, that is not what the citizens task force suggested. That is not what Forest Service wilderness managers note. That is not what forest planners and wilderness managers note. That is not what is in 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 ignored or held at the status quo (outfitting and guiding). Despite the rationale to move things "forward," the Forest Service is saying, the desired future condition of this magnificent wilderness is nothing but the past condition. Doesn't make sense.

There were opportunities to deal with wildlife management in the context of non-native mountain goat introductions and non-native fish stocking. There were opportunities to deal with outfitting and guiding. There were opportunities to really focus on the non-recreational values of wilderness, the ecological/physical 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, these issues would have been more difficult and time consuming. The plan could have provided the umbrella guidance to bring the appropriate parties together over the next 2 or 3 years to "negotiate" solutions to these complicated wildlife and grazing issues. Rather, the Forest Service and this plan have failed, again, as leaders in ecosystem leadership stewardship.

There is an interesting historical paradox in this process. There was a time after passage of the Wilderness Act where the Forest Service proposed a "punctic" concept of wilderness. Unfortunately the agency confused the notion of wilderness management with the allocation of wilderness, arguing for standards of allocation that were beyond the intent of the Wilderness Act. Many commenters and historians noted the "punctic" was designed to restrict the size of the National Wilderness Preservation System. (Deans, 1985, "wilderness and the American Mind: From the Battle for Wilderness: Wallace, Leopold, and Anderson. Land and Resource Planning in the National Forests, or The Forest Service History Series by Danny Roth, The Wilderness Movement: II, the National Forests, 1910-1966.) The paradox occurs today with the Forest Service allowing for a wilderness system to move in the opposite direction of puncticity by allowing activities that clearly degrade the ecological integrity of the wilderness context. And, of increasing concern, it all occurs during a time in which wilderness is more than ever discussed in an ecological/biological diversity context rather than the traditional simplistic primitive recreational scenario.

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 22% C 1 allocation, a 50% C II allocation and a 29% allocation in the proposed alternative. Why that distribution? What issues does it need/solve/address? Why this is the desired future condition.

To even the casual observer, it seems more than odd that the Forest Service would want 5%, 41,400 acres of the High Uintas Wilderness, to be in C III, the lowest wilderness class, still meeting the legal standards of wilderness designation. Why does the desired future condition for the Untas, presumably for the life of the next forest planning process, 15-20 years (?), harbor any C III? What issues/concerns are met by having 41,400 acres in this low class?

It seems the Forest Service has forgotten the standard rule with respect to the LAC designated future condition model adopted in this DEIS. The opportunity class designation is irrespective of the actual ground condition. The effort is oriented toward an appropriate desired future condition within the legal constraints of wilderness. Moving a theoretical C IV to an actual C III may seem meaningful. It is only in that is what the management agency wants the "ground" to "look" like. In this case, the Forest Service is suggesting that 41,400 acres of the High Uintas Wilderness should harbor the lowest wilderness opportunity class. The issue isn't that it does already harbor that class (or a theoretical lower class), but that the Forest Service wants 5% of the High Uintas to look like the lowest wilderness opportunity class. Why that? What opportunities are being met? What issues/concerns are being addressed.

The effort of this planning process should be to move the wilderness "forward attaining the highest level of purity in wilderness within legal constraints" (DEIS, 1-3). Not only is that the right thing to do within a wilderness context, and does meet the issues/concerns within the wilderness context, but it is the wilderness management policy adopted and supposedly implemented by the Forest Service (for example, see DEIS 1-4). It is what the Forest Service is supposed to be striving for as it "manages" wilderness. It goes through nearly a decade of planning and arrives at the status quo management of the High Uintas. Wilderness is not pushing the wilderness toward attaining a higher level of wilderness purity. That is why this alternative should not be the proposed action. It is wrong.

During the citizens task force LAC meetings a dramatization was made and obviously adopted by the Forest Service that the remaining 0.1 opportunities to areas where there were active cattle or sheep grazing allotments activity. Unfortunately,
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 II was shocked to see the Forest Service not utilize this alternative because it does not represent a maximization of wilderness
resources. I would like to know why it wasn't used and how the agency can portray the extent Alternative 3 as the
maximize wilderness values alternative when it isn't, even in the context of the citizen task force.

Since I've submitted the alternative during the citizen task force and during one of the scoping meetings, 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 offered to
reflect this view of the High Uintas Wilderness, which includes all of the existing C II areas in Fig. 3 as well as the
classified Fish Creek, McCoy Pahvant Lake areas, the Red Rock Creek - Little Creek corridor, Naturalist Basin and
Grandaddy Lake corridor.

It is incongruous to have this alternative featuring C III areas. It is the maximized wilderness 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 extent 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.

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
portrayed in a context meaningful to this analysis. It also biases the range of alternatives in that 475 (27f) of 276


alternatives are presented as basically the same alternative.

Opportunity class allocations should be much simpler than recommended. This is pertinent for clarity to users and
management efficiency (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 Ill in the middle of C I or C II, is access to C I to
paramount to creating confusion in expectations for users and will create benign management as this confusion will
reinforce. You can't argue the need to constrain user numbers and behavioral patterns in a significant manner when a C III area
is, or when a C II area is, in effect, a trail corridor. A trail corridor from the middle of a C II area. You will also
depart from logical C II travel and drop into C I area if those users are subject to more liberal C III standards and
opportunity class allocation instructions.

Thus the proposed alternative is seriously flawed from a management user perspective in that it is filled with tiny C IIs amidst
larger C Ills (Granddaddy creek corridor, East Basin, Hyatt Lake, etc.) or is punctuated by C IIs within C Ills
(Chalk Hills/Alwood, Smoky Fork, Henrys Fork, Middle Fork Bear, Island, Kabell, etc). Instead of a map and your
Mind, users and wilderness managers will need to carry the damn wilderness management plan and opportunity class maps
with them and also, 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.

So many unanswered inconsistencies dominate the opportunity classes that it is virtually impossible to understand the
management philosophy behind the proposed/preferred alternative. It is Mago Lake a C II, and a few dozen feet west away
is Pine Island Lake, etc. A C II Pike Fork Lake is a C II yet the rest of the Fish Creek and W. Fork Rock Creek could be
within the same existing opportunity class. The same can be said of the 600 or so acres on the east-west side of the upper East Fork of Blacks Fork. And
not only does the general " Bishop's advice" comport with his intimate stewardship wisdom (I mean that as cynically as I can muster), has placed Kings Peak, the highest in the United States, one of the highest in the Intermountain West, one of the highest peaks in the West, a classic deep
wilderness peak, in the lowest wilderness opportunity class, the same as Grandaddy Lake, Scudder Lake, or Kidney Lake.
This makes little sense.

Ultimately, the question not addressed in the DEIS, and raised numerous times is thus far in this commentary why the Forest
Service wants Kings Peak to be a C III? Why should Squires, Four Lakes, Grandaddy or Naturalist Basin be C III? What
reasonable exists for Alwood, Pine Point, Island, Kabell, Almedahl, etc. to be the lowest wilderness opportunity? What about
the four unnamed and untraveled lakes straddling the western border of the Little East Fork? What wilderness opportunity
are created or made by placing the entire Henrys Fork and Smoky Fork in the lowest wilderness opportunity setting? In fact,

(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, reservoir lakes are found in Class III only, therefore the dams in Lake Fork, Yellowstone and Uinta drainage
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 sidebars 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 I seems to
capture the intent of "attaining the highest level of purity in wilderness". Selected management indicators used to compare alternatives relative to issue I
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 skilled 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 no, 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) XNX Due to the lack of topographic barriers (resulting in management
difficulties between Mago Lake and the rest of Grandaddy Basin, the small
Class II area around Mago 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 as defined Class I.
Outfitting/Guiding

A decade or more time is spent with wilderness outfitters and guiding along with numerous meetings, dozens of EAS, CEs and an outfitter Jan on the Ashley National Forest and we get the status quo thrown in our face.

Beyond that, and 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 and guiding is "authorized if there is a documented need for the services." The reader is directed to the analysis in Appendix A which defines public need not as an "immediate desire for a permit, or market generated demand (solicited calculations)," 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.

On the other hand, it is also clearly stated in the DEIS that "permit" commercial outfitted use is "permitted only to help achieve the mission of the Forest Service." The latter is not to determine public as clearly noted by the other two were not even discussed in the DEIS. This also represents an apparent lack of any need for additional environmental review. In fact, the Forest Service has glossed over the data substantive issue and the secondary context of the issue (impact of outfitter and guiding). The data simply does not belong in a commercially produced wilderness management plan.

The indicator(s) raised in the Appendix in order to determine in a rational and justifiable manner the public need for additional environmental review. In fact, the Forest Service has glossed over the data substantive issue and the secondary context of the issue (impact of outfitter and guiding) and twisted outfitter and guiding in the most convoluted and biased manner I have seen in a long time.

The data raises the issue(s) raised in the DEIS analysis.

(27t) Measurement indicators were used to compare alternatives for Issue 3. For example, use of "economic effects on outfitter operations" on page 1-7 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 1-7 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.

(27u) Economy, convenience and commercial value were used only to compare the economic 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...
Because they are inconsequential, particularly since a number of the operations have their base in Wasatch Front communities.

One of the requirements to determine a public need exists whether non-wilderness lands are available. In every instance the Appendix A (A-4-5) notes outliers provide opportunities for non-wilderness outfitted trips for everything from packing to sightseeing and hunting. This analysis must be part of the DEIS proper for full public review, scrutiny and analysis to determine the importance of wilderness outfitters within the High Unita in the context of meeting the public need. Assess the significant procedural and substantive errors in the DEIS and Appendix A which deals with economic effects upon outfitters and "market generated demand." Another way to determine public need is noted in the DEIS listing allowing permit numbers are rarely met right now. Any study allowing the extent condition to increase. The Forest Service seems to be seeing, as a desired future outcome, the current ability to guide, without having to add to the DEIS at part of a public issue. However, the ability to want outfitters and guiding to increase above the actual existing use levels. This is a problem to monitor the use, particularly with emphasis to increase isn't something one can just ask. As a responsible management agency, you should study the DEIS permits to public land use. Your current public lands without some level of consideration. Of course, outfitters will tell you their use will increase, they will lose substantial amounts of income if you cut them back in any way and their environment/societal impacts will be more important. Please, give us all of our comments.

Guiding and guiding also presents us with the standards and indicators as the opportunities to work with the opportunity classes. Under the box area of people and 7 weeks, yet for all other classes, there are 17 to 19 weeks. The box area for the opportunity classes may be traveling inside and outside opportunities. This can be followed by making the group size, a consideration. People and 7 weeks or 8 weeks. This is what many of us suggested during the initial hearings. The DEIS would be consistent with the wilderness management literature which notes consistently larger groups make more specific biophysical impacts than smaller groups. And by doing this it would help bring the G-7 areas into scale and the issue.

Buck and Buck 1978-1989 would be a wise thing to do.

But let's not worry whether wisdom is the guiding principle within the Forest Service. Thus it would be proper to allow these opportunity classes as I've noted in this comment to make them more geographically based and comprehensive. This would make the implementation of these standards and indicators easier to mention more meaningful. Already, the obvious outliers will be told by the Forest Service that it is acceptable to violate the 7-4 standard when going through below opportunity classes even if they stay one, two or three nights in a G-7 area, right?

Finally, the DEIS is totally lacking in meaningful discussion of the impacts, both biological and social, upon the wilderness environment, wilderness users and wilderness values. Standards and indicators do not deal with impacts upon wilderness values/resources. Rather, they exist only with whether the outfitters are meeting the stock use, service use and camp standard. Is this a reliably favorable bias? If the users on page 2, 1-9 do not deal with impacts upon wilderness management, then it is unacceptable. One of the transfrontiers in wilderness management is that larger groups, whether formally outfitted or not, create disproportionate impacts upon the wilderness setting. Some of these studies date back to the initial carrying capacity work by Clepper et al., 1979. "Carrying Capacity of Recreational Uses in Recreational Areas and" (1970), "Carrying Capacity in the Bob Marshall Wilderness, Montana," and Cole and others, "Attitude Towards the Use of the Wildlands" all deal directly or indirectly with this concern.

The draft p 4-15 has no merit unless it is compared to the existing utilized service days. As I've already noted, the central issue is how the wilderness and wilderness users will be affected by guiding and guiding, not how many service days may be authorized or unAuthorized (4-15-4-26).

I have tried in the Uintas for a few times this summer on extensive backpacks and have encountered some of the worstkształc of this type. I've stood out of some of the worst usable paths and have found the use of wilderness users extremely good. I recognize the "official" outfitter will say it is the weekend horse user, the (weekend horse user says it is the outfitter). I've talked with both groups. The point is impacts from large outfitted groups must be dealt with in the plan and not a mockery.

Adjacent Land Management

One of the policy guidelines and principles of wilderness management (DEIS 1-3-1-5) is that wilderness does not exist in a vacuum. The out of the park and off the road use that I've ever seen, despite vigorous efforts, is usually good and automatic increases the size of the wilderness by and large decreases the value of the wilderness because it is subject to undesignated lands or non-wilderness. By the policy and principles of wilderness management state that activities on both sides of the "wilderness line" must be considered, considered and addressed in the wilderness management plan.

The DEIS fails dramatically in principle and policy context. To suggest that DEIS on High Unita Wilderness management doesn't consider such activities because it is outside of the purview of the proposed management actions clearly violates wilderness management principles and policies and ignores the proposed management impacts.

September 13, 1996
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.

Both stock and non-stock users who choose to travel in Class I accept the responsibility to travel lightly and in small groups.

(27y)Outfitters are held to the same resource standards as the general public. For example, when a standard for erosion is exceeded, management actions designed to reverse that trend are implemented and applied to all human users.

(27z)Types are corrected.

(27aa)The table on p. 4-15 lists service days by drainage for each alternative for use in comparing effects on individual outfitter/guide service operators when different use limits and desired conditions designation Classes I-II are considered (issue 3). The complementary issue of how the wildlife resources and other users are affected by outfitter/guide services is not specifically addressed because there is no sure way to identify effects attributable primarily to outfitter/guide service providers (which only account for less than 1% of total visitor days in the wilderness) since use by non-outfitted public occurs simultaneously and concurrently to outfitter/guide use. However, several issues address the effects of cumulative human use effects on other 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 is to consider contiguous lands. In the case of the High Uinta 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 eases will help determine the development level of the facilities outside the wilderness.

(27cc)It is true that one important management principle for wilderness is to consider contiguous lands. In the case of the High Uinta 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 eases will help determine the development level of the facilities outside the wilderness.

(27dd)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.

Both stock and non-stock users who choose to travel in Class I accept the responsibility to travel lightly and in small groups.

(27y)Outfitters are held to the same resource standards as the general public. For example, when a standard for erosion is exceeded, management actions designed to reverse that trend are implemented and applied to all human users.

(27z)Types are corrected.

(27aa)The table on p. 4-15 lists service days by drainage for each alternative for use in comparing effects on individual outfitter/guide service operators when different use limits and desired conditions designation Classes I-II are considered (issue 3). The complementary issue of how the wildlife resources and other users are affected by outfitter/guide services is not specifically addressed because there is no sure way to identify effects attributable primarily to outfitter/guide service providers (which only account for less than 1% of total visitor days in the wilderness) since use by non-outfitted public occurs simultaneously and concurrently to outfitter/guide use. However, several issues address the effects of cumulative human use effects on other resources and other humans (e.g. issues 1, 2, 4, 5, 7, and 10).
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.

(27dd) This is true, but the Forest Service, many times, has no control over where a release is made.

(27ee) 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.

(27ff) 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.

(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 sustained. These desired conditions are intended to apply to management of all resource users.

The noted fish stocking plan and MOU should be completed and outlined in the DEIS as it is part and parcel of the planning process.

If the Ashley and Wasatch National Forests are willing to allow non-native ("woody") fisheries and terrestrial species to be indiscriminately introduced into the High Untas Wilderness in contradiction to intent, policy and common sense, I think you owe all of us a clear explanation. I look forward to hearing it, particularly since the DEIS notes the desired condition is stipulated to be "Natural processes and the forces of natural selection determine the diversity of wildlife and fish habitat and species. Wildlife populations are limited to indigenous species." The words and deed don't match. Also, don't forget that according to the DEIS, only 35% of wilderness users at two of the nearest trailheads planned to fish.

Recreation User Groups

I must admit to being rather stunned and confused about the three identified wilderness user-type groups. Where did that come from? Was the data or research have you relied upon to categorize High Untas Wilderness users in these three groups? I am not sure if this is relevant or even valid. It is so broad that it is unfair and probably meaningless. You are not matching the wilderness for a group type and no group type can adequately capture the intent or value of wilderness. Users undoubtedly fluctuate between any categorization depending upon a number of factors: time length, intensity, geography; or use. What is the purpose of this discussion and how has it contributed to your selection of an alternative? It certainly fails in the typical user trend or characterization studies. (See, for example, "Human Values and Codes of Behavior: Changing in Oregon's Eagle Cap Wilderness Visitors and Their Attitudes," Natural Areas Journal, Vol. 16, 1996; "Human Wilderness Visitors and Visitors: Boundary Waters Canoe Area, Minnesota and La Sauk Wildernesses," USEPA E-80-043, October 1979; "Human Experience of Wilderness/Review of Needs and Policy," Western Wilderness Fall 1988; "Wilderness Use and User Characteristics: Ending Some Misconceptions," Western Wilderness, Fall 1988.)

This assumption (4-4 4-6 4-8) that one user group might prefer opportunity class II or III than class I, for example, is based on needs document (b) What is your documentation? The purpose is not to provide a second choice for each user group (as the preferred alternative noted) or to maximize for one group its suspected best opportunity class. The idea here, in case the agency has forgotten its purpose, is to preserve the wilderness resource and experience while always moving toward a purer wilderness context. If you manage for lower opportunity classes and user groups who care less about quality wilderness experience, you have made a severe and singular error in wilderness management. The assumption that some users are attended by the presence of Forest Service wilderness rangers is absurd. Many users are concerned that wilderness rangers are not always treating (extensive horse use and large base camps) as lightly as the rest of us.

File

DEIS and Wilderness Management Plan should, of course, harbor the guidelines and structure of a wilderness fire management. It doesn't; it is an oversight and must be rectified if the intent is to allow natural processes to guide them.

Campfire Closures

None of the successes has been the Kansas Ranger District fire closure. Having spent time in Four Lakes Basin this summer and in the managers reach (basal) on the Hines and Smith Fork, I noticed no or no quantitative difference in fire results as compared to Natural Basin. Clearly such a policy direction ought to be in place at least in these areas. The EIS should provide a class indicator and standard for all of the wilderness to assure the closures are in place prior to reductions in fire fuel loads. More and more hikers and horse users are fully outfitted and support the need for an activity. (See “Low-Impact Recreational Practices for Wilderness and Backcountry" David Comisky USFS-NTEDS.)

I ES should have a policy directive that prohibits any more trail construction. The wilderness is now described as fragile, in fact, a standard ought to be initiated which would inventory unnecessary trails and downscale them.

Horse Use

Horse riders are extensive in wilderness settings. Untas horse uses seems to be an uncontrolled lot with respect to new camping techniques. If we get it right, the standards and indicators in this DEIS must be utilized by the Forest Service to severely curtail horse use. Let us hope horse users in the Uintas will figure it out sooner than that.

I hope these comments will be utilized and not simply dismissed with a quick "thank you for your concerns." Bert and Barbie, if you have any questions, please contact me. Thanks.

Best,

Frontier Trails

September 15, 1996
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.

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 species and developments that need protection from fire.
8. Identification of the appropriate level of monitoring and evaluation needed for the PNF program.

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.

Evaluating trails is an on-going process. In the past few years we have identified trails to leave off maps submitted for issuance 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.
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.

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" patrolling, trail maintenance etc. are key needs.

Regarding the plan itself Bert I think you folks are way off.
In my opinion, based on a few years of experience in this area, there should not be any changes in the categories of wilderness—i.e., wilderness—is all wilderness, and should be managed uniformly. It is not consistent with the wilderness Act.

The kind and intensity of management can be varied on the deciduous conditions. Without using classes to allocate management resources and effects, there is an inherent danger that the entire wilderness may degenerate to some minimum standard due to an uncoordinated management approach. Defining these classes provides managers with a tool to enhance the protection of wilderness.
I have several concerns with the “Draft Environmental Impact Statement for Management of the High Unitas Wilderness.” These concerns involve assumptions made, alternatives proposed, and lack of consideration of some environmental impacts.

The assumption that grazing interests, horse users, outfitters and guides, and hunters are both local and traditional is unfounded. These are not the interests that led to the designation of the High Unitas Wilderness, and though they use the wilderness, they are not the traditional supporters of its existence. In fact, their uses are not wild. Nor are these interests local. I’ve known sheepmen who live along the urban Wasatch Front, but graze their flocks in the High Unitas Wilderness, horsemen from the Wasatch Front who yearly ride to Granddaddy Basin, and hunters from the Wasatch Front who routinely hunt in the High Unitas. Outfitters and guides may be local, but their customers are not. To consider high impact users as local, a designation which in today’s political language gives them more power, is wrong. To consider people who want to preserve the wild as “non-local” is equally wrong. This arbitrary
division 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 Locustee, Evanston, Vernal, Salt Lake, or
New York.

Only 1 alternative proposes more than
25% of the area as Class I. To propose that
in the nation's 17th largest wilderness less than
113,000 acres should be managed for the least
human impact is short-sighted. Once these lands
are impacted, they cannot become truly wild again.
[The alternatives should be altered, or more alternatives
added, that consider 40% or more of the area
be managed as Class II. Within Class I areas,
watersheds should be managed for indigenous aquatic
species. 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 affects of fish planting.]

Areas designated as Class III should be
restored, and should be limited to day use areas
within a few miles of Highway 50. The ecosystem
and users will benefit from keeping most of the High Uintas
wild.

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.

The draft EIS does not include analysis of the
management of contigent lands and how activities
on contigent land will affect the High Uintas Wilderness.

(29a) 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.

(29b) 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.

(29c) 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.

(29d) 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.

(29e) The physical presence of livestock in wilderness is clearly within the
Wilderness Act. The removal of livestock from wilderness based on wilderness
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.

(29f) 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 access will help
determine the development level of the facilities outside the wilderness.
Again, some of the effects to consider are water quality and wildlife habitat, especially pine marten and goshawk habitat.

The draft EIS does not include analysis of non-native fisheries or introduced species to the natural food chain, and the effects of the concentrated use around the stocked lakes.

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
Dear Mr. Kulessa:

I am writing to comment on the Draft EIS for the High Uintas Wilderness. As a member (during the first year) of the Citizens FAP Committee, I have participated in, and subsequently observed, the evolution of this plan over the past four years. I write with three important comments:

1. [Regional wilderness should be managed as wilderness] Where its condition is not consistent with what can be honestly called wilderness, management must to put in motion a question that will lead to wilderness conditions.

2. [The alternatives submitted by the Utah Wilderness Association in the only one that approaches the standard that exotic species should be treated as wilderness.]

3. [Local areas should be managed for indigenous species. Non-native species should be controlled.]

(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 comment.

Sincerely,

[Signature]

[Handwritten name]
Bert Kulesca  
Forest Supervisor  
Ashley National Forest  
355 N. Vernal Avenue  
Vernal, Utah 84078  

September 11, 1996  

Dear Mr. Kulesca,  

I am happy to provide comments on the High Uintas Wilderness Management Plan. Please include them in the official record of public comments 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 wilderness 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 drainage basins for 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.  

31a Why has the Forest Service not recommended a meaningful plan for the improvement of this magnificent range? 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 outfitter 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 fires 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 of the range matches the intent of the area's designation and I strongly support Alternative 3. "Little human influences 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 pages.)  

Outstanding opportunities for solitude and primitive recreation are key words in the Wilderness Act and 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 in regrouping together. Horses beat down a trail, carry in too much gear and let too many people and I speak from a lifetime of horse use. I know personally what damage one, let alone a dozen horses can do to trees, meadows and trails in any weather condition.  

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.  

31d 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.  

31e 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 an unacceptable adverse effect on visual tree resources.  

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 will be managed and or restricted to protect natural resources.
Ecological processes should dominate, not the ORV damage such as that found along the lower reaches of the West Fork, Blacks Fork or heavy camspite damage in lake basins or large horse groups traveling up and down drainages. Campfires should not be allowed in high use areas.

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. Class I 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 Refuge.

We do not 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, faces and dust, and the removal of vegetation to the point of demending entire slopes and meadows is something the agency 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.

I have hiked countless drainages and side drainages, forested slopes, meadows, stream courses and hallowed country in the Uintas. In my opinion, I should include everywhere the sheep don't graze, the magnificent country found in Grandaddy, Four Lakes, and Naturalist Basins, the Amethyst country at the top of Stillwater, Squaw and East Basins, the reaches of the Uinta and Yellowstone Rivers, and 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.

After two decades of hiking this range, I cannot sit by and watch the largest Forest Service wilderness in Utah erode on a quagmire of politics and fiscally fared management. It is not too late to rescue the Uintas. And I sincerely trust this is not a futile effort on 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 decisions about the Uintas.

Sincerely,

[Signature]
Ref: SEPR-EP

Mr. Burt Kulesza
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. Kulesza:

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.

[32a] 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 Plan. 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 wilderness.

[32b] The EPA believes that selection and implementation of Alternative I, the Forests preferred alternative, as the proposed action meets the stated purpose and need.

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 L0 (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 draft EIS. If you have any questions, please contact Mike Hammer of my staff at (303) 312-6563.

Sincerely,

Carol L. Campbell
Carol L. Campbell, Director
Ecosystems Protection Program

cc: Elaine Suriano, OFA EPA-HQ
SUMMARY OF EATING DEFINITIONS AND FOLLOW-UP ACTIONS

Environmental Impact of the Action

1. Set of Objectives
   The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have discussed
   modifications for mitigation measures that could be implemented without substantive changes to the proposal.

2. 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 intends to work with the
   lead agency to resolve these impacts.

3. Environmental Objectives
   The EPA review has identified significant environmental impacts that may be avoided in order to provide adequate protection for the environment. Corrective
   measures may require substantive changes to the preferred alternative or at least a commitment of some other potential alternative (including the no action
   alternative or a new alternative). EPA intends to work with the lead agency to resolve these impacts.

4. Environmental Countermeasures
   The EPA review has identified several environmental impacts that are of sufficient magnitude that they are unavoidable from the standpoint of
   public health or safety or environmental quality. EPA intends to work with the lead agency to resolve these impacts. If the potential environmental
   impacts are not corrected at the final EIS stage, this proposal will be reconsidered for referral to the CEC.

Appendix A. Impact Statement

Category 1: Significant
   The EPA believes the draft EIS contains data for the environmental impact(s) of the proposed alternative and these of the alternative reasonably available
   to the project. In order to fully protect the environment, or the EPA review has identified one or several feasible alternatives that can reduce the magnitude of environmental impacts in the
   draft EIS, which could reduce the environmental impact of the action. The corrected environmental information, data, analysis, or discussion should be
   submitted in the final EIS.

Category 2: Insufficient Information
   The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that could be avoided in order to fully protect the
   environment, or the EPA review has identified one or several feasible alternatives that can reduce the magnitude of environmental impacts in the
   draft EIS, which could reduce the environmental impact of the action. The corrected environmental information, data, analysis, or discussion should be
   submitted in the final EIS.

Category 3: Insufficient
   The EPA believes that the draft EIS reasonably considers potentially significant environmental impacts of the action, or the EPA review has
   identified one or several feasible alternatives that are outside of the scope of alternatives analyzed in the draft EIS, which must be analyzed in order to fully protect the environmental impacts. EPA believes that the corrected environmental information, data, analysis, or discussion are of such a magnitude that they should be fully public review
   of a draft EIS. EPA does not believe that the draft EIS contains any feasible alternatives for the purpose of the EPA analysis and CEC review, and thus should be formally
   reviewed and made available for public comment in a supplement or revised draft EIS. In the event of the potential significant impacts involved, this
   proposal could be a candidate for referral to the CEC.

   Impacting the Environment.

Figure 4-1
Of the alternatives that were studied, [2] 33a support alternative 3. Wilderness preservation should be the primary goal. What is the purpose of calling the area wilderness if it is not managed to keep it as natural as possible?

Grazing should not be banned if that was one of the premises made when wilderness designation was offered. But, I believe the premise was that grazing would be phased out. Grazing definitely should not be expanded into areas that were not grazed at time of wilderness designation. When grazing conflicts with native 33b species like elk, deer, etc., 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 on a given land management requires that a certain number of animals should be restricted and the time period reduced so that the land can recover. Humans would be managed on wilderness the same way, some places 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 resources. Restrictions need to be reasonable - people should be permitted to visit and enjoy wilderness, but can be restricted without damaging the resources and, non-native species should not be brought in to disrupt the native eco-systems.

Sincerely,

Gret Hansen

Gret Hansen
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 States 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 Uintas. 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 an unacceptable adverse effect on visual/tree resources.
August 30, 1996

Bert Kaleza
Forest Supervisor
Ashley National Forest
355 North Vernal Ave.
Vernal, Utah 84078

Re: Draft EIS - High Uintas Wilderness

Dear Bert:

It seems after two years or so of study, the Forest Service has taken two steps back in time. The High Uintas Wilderness is the crown jewel of wilderness areas in Utah, yet you are content to maintain the status quo. The people of Utah simply want to know: Why has the Forest Service taking an aggressive approach to the High Uintas Wilderness area? Twenty-three percent of the wilderness as Class-I is not a sign of aggressive management.

The wilderness area should be viewed upon as a wild, pristine area and not a piece of real estate with commercial value! It is my suggestion that Class-I pristine areas should include all ungrazed portions of the High Uintas. In addition, I support campfire restrictions prohibiting open fires in the High Uintas Wilderness.

I urge the Forest Service to address issues pertaining to (1) fish management (non-native fish stocking), (2) cattle grazing (efforts to phase out all grazing in designated wilderness areas) and reevaluate in adjacent areas in support of adjacent land management, (3) ecosystem planning and management (such as non-native plant species threatening natural functions of the ecosystems), (4) wetland & riparian area management (addressing various impacts to the aquatic systems in order to maintain a balanced ecosystem).

Rules of Wilderness Management should be met by the Forest Service. Friends of The Uintas endorse Alternative B.

40% Class I - Pristine
36% Class II - Moderate human influence
24% 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 UW resources for future generations.

(34b) Some areas not grazed and not in Class I do not have Class 1 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 trailheads 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 an 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-565-1)

Your comments and all those regarding fish stocking in the UW will be shared with UDWR as negotiations proceed on an MOU.

(34d) This comment 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."

(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
(Acting Director)
Friends of The Uintas
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 true concept of wilderness. The following reasons are why I favor maximizing the areas devoted to wilderness:

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 indigenous to the wilderness areas need to be protected as a part of the baseline as well as air and water quality.

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 throughout the world is imperative. If we have the foresight and backbone to retain these wilderness baselines then the blackhole of human over population may be more receivable.

The concept of wilderness should prioritize 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 predacious 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

Milton Hollander
2561 E Valley View Ave
Salt Lake City, Utah 84117
September 8, 1996

(35a) We feel the preferred alternative (incorporating the desired conditions: 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) Described 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 overpressuring 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.

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.

Milton Hollander
September 9, 1996

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 36a Wilderness and [has no comments].

Sincerely,

Robert F. Stewart
Regional Environmental Officer
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 Blackes Fork Trailhead.

We traveled trail #8, 103, 25 & 102.

We thought the trailhead facilities were fine as well as the trail conditions.

We were just dismayed at the evening grazing of Owhee Basin, Lambert Meadow & the meadows below Red Reef Pass (Lake Fork Side) by hundreds of sheep. The 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 Owhee Basin and Lambert Meadow indicate native plant communities of natural appearance dominate this area concurrent with grazing.
meadows were trampled. Dr. chewed to stubble.

Sir, I urge drastic reductions in the amount of sheep allowed to graze within the High Climates Wilderness because these high mountain meadows should have been vibrant lush with flowers of green leaves. Too much of our public lands are allocated to overstocked sheep grazing without any benefit to the public or with much desiccation to the natural wonders like the Climates Mountains. Please keep me informed on the Climates Wilderness Management Plans.

Sincerely,

Clifford Pere
THE WILDERNESS SOCIETY

September 16, 1986
Bert Koleska, Forest Supervisor
Ashley National Forest
355 N. Verdi Avenue
Verdi, UT 89489

Dear Mr. Koleska:

On behalf of The Wilderness Society and its 311,000 members nationwide, including 2,000 members 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 protection of wilderness is central to the mission of The Wilderness Society, and our members are avid hikers, birdwatchers, 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 management. Furthermore, because this wilderness is a unique and stunning wild place of significant size within the State of Utah, its management is of great concern and precedent.

**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 proposal of Class III as a desired wilderness outcome, and would like to see the majority of lands within the High Uintas managed as Class II (the most pristine condition). We have strong concerns about the failure to address two critical and influential issues -- grazing suitability and fish stocking -- in the DEIS. The lack of data provided on fish and wildlife and impounded species is also disturbing 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 provision to greatly increase the role of fire in the High Uintas Wilderness ecosystem.

**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 impacts, that are then 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 designed to achieve desired wilderness conditions" (p. 1-2) emphasis added. Class I is described:

(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 UUWR in preparing a memorandum of understanding for fish stocking in the High Unatas.

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.
as essentially 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 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.”

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 acceptable level of human
impacts, and then to regulate use accordingly.

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
limiting 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 campsites banned permanently. We are supportive
of the steps that the DEIS takes in this direction to curb adverse 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.

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 its 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 Granddaddy 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 Granddaddy 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 Unitas in a pristine condition. Alternative 3, which still proposes less than half of the wilderness area be managed in its pristine state, is the very minimum acceptable choice among those offered, and we strongly urge the Forest Service to alter its preferred choice.

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 suitability and potential capability of National Forest System lands for producing forage for grazing animals” be determined during the forest planning process. The purpose of this analysis is to determine whether an area is capable of being grazed (i.e., there is forage and cattle can get to it), and b) whether grazing is an appropriate use of area given its likely economic and environmental 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 govern the management of the High Unitas, 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 resultant conclusion that grazing could consequently be ignored in the DEIS. The relevant forest plans do not discuss whether grazing is the most appropriate use of these lands (or at what level), what the economic and environmental tradeoffs are, and what other uses are precluded because of grazing. Given that the proposed wilderness management plan will be an amendment to these forest plans, and given that these forest plans are not slated for revision in the near future, grazing should be addressed in this DEIS and comprehensive grazing capability and suitability analyses be conducted.

Grazing is a very relevant issue to be considered in the wilderness management plan — NOT because the area is a wilderness area per se, but because grazing is a major use of this heavily used area of these two National Forests, and was identified as a concern of citizens commenting in the scoping documents. To the extent that grazing is having a significant impact on the High Unitas Wilderness, yet is ignored in its management plan, the plan will fail to meet its goals of adequately restoring and protecting wilderness values. Again, we urge the Forest Service to conduct the required grazing capability and suitability analyses 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.

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 “perhaps the most popular recreational activity in the High Unitas 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 Act 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 Unitas 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 Unitas Wilderness EIS does not omit opportunity for public input or appeal of decisions related to livestock grazing in the High Unitas Wilderness.

(38k) Grazing capability is the subject of numerous studies conducted on these National Forests within and without the High Unitas 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.

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.

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."
- "Rear introduction [alle wel] of wildlife species indigenous to the area which were extirpated by human-caused impacts, and to perpetuate or recover threatened or endangered species."

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 demands for angling opportunities which may not be possible without augmentation of the natural fishery.

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 Wildlife 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 BioWest 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 proven free for over 10 years. The facilities are checked annually for these pathogens. (personal 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]isible populations of indigenous High Uintas 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.

In addition, we note that the Forest Service is obligated under the NEPA and the Endangered Species Act not only to protect listed species from jeopardy, but to help recover these species, as well as 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 amphibians into 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 aquatic species, it is all the more important that the DEIS provide more detailed information on the ecological health of streams and "-ies within the High Uintas so that the public can provide informed input into 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 for resident species, and the impacts of recreation and fish stocking on native fish and wildlife as well as sensitive and listed species, before making final decisions on use levels and locations within the wilderness area.

The proposed let-burn wildfire policy will help undo the ecological damage of decades of fire suppression.

We commend the Forest Service’s recognition within the DEIS of the important role which fire plays in maintaining ecosystem health. "Fire is one of the primary natural ecological processes serving 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 ecosystem by allowing naturally-ignited wildfires to burn and using prescribed burning as necessary to maintain historic disturbance regimes and natural succession processes. This far-

(38a) 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.

(38b) We agree, more specific data on these parameters will help us make more informed decisions regarding use levels and locations in the HUIW. 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,

[Signature]

Suzanne R. Jones
Associate Regional Director
To Whom It May Concern:

Re: Draft Environmental Impact Statement
High Uintas Wilderness Forest Plan Amendment

After reading through the summary of the Draft Environmental Impact Statement I agree with the preferred alternative. I, 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.

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 1975.

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.

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

(39a) Preference for Alternative I

According to the literature (Cole, 1985), popular guide books (Davis and Vernath, 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.
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.

I agree there should not be too many trails but trails are absolutely necessary to access the High Uinta. 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.

I am not familiar with the north slope of the Uinta 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.

I appreciate the opportunity of reviewing the summary draft statement and hope that my thoughts will be of some value.

Sincerely

Ronald Lisonbee
S. Ronald Lisonbee
Range Consultant
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: UT96071-030

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 Uinta Wilderness Area.

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 have fostered 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.

(40a) We anticipate continuing our good working relationship with the State to tackle this issue.

(40b) Designation of the High Uinta Wilderness in 1984 serves to protect perhaps the most valuable resource in these mountains: 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 hydrometeorological 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 area applied to the water rights, etc., issue. The main point is, however, the DEIS does consider, analyze, track, discuss and make decisions about some of these issues. It is therefore necessary to comment and at times take issue with the DEIS’s position.

It is further unclear as to how Class I, Class II, and Class III affect these issues. It is the position of the Division of Water Resources that Class I or Class II not be used to restrict hydrometeorological data collection sites in the Uinta wilderness area. Or, in other words, if hydrometeorological data (and other related water resources activities) are permitted by the wilderness law, then this management plan should not be more restrictive using Class I or II to prevent these activities. On page S-11, paragraph 9, it states that although “minimum tool concepts” is an established procedure so is the use of helicopters and other equipment for annual maintenance and emergency repair. This should be noted and allowed as needed.

The reference to relocating water use and predicting functions outside the wilderness must relate to the ongoing work with CUP on the replacement projects. We support such relocating when tied to these projects but strongly disagree that the management plan for the High Uintas wilderness should have any kind of specific policy to relocate water use and measurement out of wilderness areas. The language in paragraph 9 should include the opportunity to add, re-establish, relocate (inside), and upgrade, as well as relocate (outside) the wilderness areas.

Some background information and comments concerning Snotel and other measurement equipment are included below as part of these comments. The Lightening Lake Snotel site was removed from the High Uinta wilderness area. It is now impossible to accurately forecast the Rock Creek-upper Still water reservoir inflow. Water to the Wasatch Front is wasted due to the lack of an accurate and timely forecase. Rock Creek drains a large area from Hayden Peak on the east to Clement Mountain on the east. Since the Lightening Lake Snotel site was removed, the forecast for Rock Creek has been very poor and could be improved by re-establishing the Lightening Lake site.

Henry’s Fork snow course on the north side of the High Uintas needs to be updated to a Snotel site. If Snotel precipitation gauges and water content snow course sites are removed, years of data will be lost for forecasting High Uinta mountain streamflow. Many thousands of dollars and man hours would be totally wasted. Forecast accuracy of the High Uinta wilderness streams could 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.)

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.

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 Utal 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 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 size. 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.
Snotel sites are located high in the watersheds near Five Point Lake and in the headwaters of Lake Fork River. Snow courses, Snotel sites, and aerial markers are located on the Uinta, Yellowstone, Henry’s Fork, and Lake Fork Rivers. Henry’s Fork is the only snow course and aerial marker that remains in the High Uintas wilderness area on the north slope of the High Uintas. This site needs to be upgraded to an automatic on-call Snotel site. There are two Snotel sites, one snow course and one aerial marker located in the High Uinta wilderness.

Two of these sites are battery and solar-panel operated and require recharging and maintenance each year. Emergency maintenance will require helicopter flights or ground transportation (snow machine) into the High Uintas wilderness to repair the electronics or replace the batteries.

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Utah State Clearinghouse at the above address or call Carolyn Wright at (801) 538-1535 or John Harja at (801) 538-1559.

Sincerely,

[Signature]

Brad T. Barber
State Planning Coordinator

(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) The HUW will be managed according to the Wilderness Act. The desired conditions, standards and criteria developed will be designed to protect fish, wildlife and plants including all threatened, endangered, and sensitive species. They will also insures 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, 1984, 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 23, 1996

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 N. Vernal Ave.
Vernal, UT 84078

Dear Mr. Kulesza:

I appreciate the opportunity you have extended to me to comment on the proposed DEIS of the 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 to its further destruction. I agree provide for the revitalization of this wilderness will be a formidable task. Planned management of the region will be a permanent necessity.

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 critical 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,

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 shows very little obvious difference 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.
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 fisherman's trail around each of these lakes complete with worm bins, 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.

The lakes in the Uinta Mountains consist of drainage lakes (largely impacted by exotic fisheries), the semidrainage lakes (identified by their yellow pond lilies), non-drainage lakes (identified by total lack of drawdown and ring of dead trees from the high precipitation years of the early 1960'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 neotenic tiger salamanders—salamanders that specialize in reproductive capabilities 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 non-drainage lakes are clustered in the north slope of the Uinta Mountains and contain the gastropod *Helisoma*.

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

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(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 Understanding, 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).

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 such a 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.

Anyway, my point is that 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, 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.

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 1980's, 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 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) in order to maintain and support natural processes, natural appearance, and natural ecological role of fire. Management based on desired conditions will provide for natural conditions.

(44d) We feel the preferred alternative (incorporating the desired conditions descriptions and standards described on pages 2-2 through 2-17) meets or exceeds the intent of the Wilderness Acts and will protect all HUW resources for future generations.

(44e) 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 trailheads 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.
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.

(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 Refugeas outlined by the Utah Wilderness Association.

(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.

(d) Campfire restrictions in Class I areas should be similar to those in Naturalist Basin.

(e) Look at enforcing the Forest Service's own outfitting and guiding criteria—possibly placing more restrictions on them.

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 commenters 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
3801 South Viking Road
Salt Lake City, Utah 84103

(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 refuge 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 slowly 'phase out' grazing." The Congressional Grazing Guidelines clearly place this comment beyond the scope of the EIS.

(44h) 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/treer sources.

(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.
DEI for Management of the High Uintas Wilderness

Date: August 19, 1996

To: Bert Kulesza
   Forest Supervisor
   Ashley NF

Bernie Weinhard
Forest Supervisor
Wasatch-Cache NF

Regarding the Draft Environmental Impact Statement, High Uintas Wilderness Forest Plan Amendment. The Natural Resources Conservation Service, USDA, Snow Survey Program has the following comments.

1. On page S-12, last paragraph, first sentence, the draft currently reads: Visitors may come in contact with water impoundments or snow measurement devices. This should be changed to read: Visitors may come in contact with water impoundments or hydrometeorological measurement devices.

The reason for this change is that at SNOTEL sites, much more information than just “snow measurement” are collected. These currently include precipitation, temperature, depth, and potentially wind, solar radiation, fuel moisture, soil moisture and temperature, etc.

2. On page S-29, and 3-32, in the table of existing conditions in the “Rock Creek” column under # dams, SNOTEL sites, it is listed as having one (1) SNOTEL site. The current Rock Creek SNOTEL site is below the Stillwater dam, outside of the Wilderness area and therefore should be listed as none. This of course assumes that Rock Creek is the SNOTEL site of the reference. There was a SNOTEL site, Lightning Lake, within the Rock Creek basin which was removed in the late 1980’s which could be the referenced site.

3. On page S-30, and 3-33, in the table of existing conditions in the “Henry's Fork” column under # dams, SNOTEL, it is listed as having “none”. While this is technically correct, we still operate a precipitation gage and a Snow Aerial Marker that is within the wilderness boundary. This is the only hydrometeorological data we have in this area and it is critical for the accurate water supply forecasts in Henry's Fork. It should be reflected in the existing conditions in some way.

4. On page 1-10, paragraph vi. Water Rights, stabilization of dams and hydrometeorological data collection sites states: “There are presently two hydrometeorological data collection sites
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 two (2) 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,

[Signature]

RANDALL P. JULANDER
Snow Survey Supervisor

cc:
Phillip Nelson, State Conservationist, USDA, NRCS, Salt Lake City, UT
Marylin O’Dell, Asst. State Conservationist, USDA, NRCS, Salt Lake City, UT
The following is the U-Bar Ranch's response to the Draft Environmental Impact Statement regarding future management of the High Uintas Wilderness. I have learned much since acquiring the 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.

I felt that our meeting on the night of September 10 in Roosevelt shed much light on the outfitters' general concerns regarding this plan. However, I do not feel very comfortable disagreeing 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 do not want the contents of this communiqué to negatively impact on that relationship. One thing is clear...the U-Bar Ranch cannot be successful without the support of our District Ranger and the USFS.

With that said, I will attempt to present our comments regarding this DEIS.

When we purchased the U-Bar, the LAC process was in progress. I attended several meetings and never really understood what was going on. Amongst the outfitter-guide community there seems to be a general consensus that their input was not given adequate consideration and that the results of this exercise were biased against the guide community. Since I was new in this industry, I am unable to draw my own conclusion but find it compelling when virtually all outfitters/guides who followed the LAC came to the same conclusion.

Without any burden of pre-conceived thoughts, I have attempted to review this document on the basis of the summary and the comments made by both sides at our Sept 10 meeting. It seems to me that the basic premise that "human overuse threatens the integrity" of the wilderness and "visitor solitude and primitive recreation" is simply not supported by facts. I would like to know what facts exist that support this premise. We have never taken a guest into an area that was not totally in awe of what they saw and experienced. This last summer we took a gentleman, Al Fleming, into the Chain Lakes Area. He now lives in Alaska and was last in the Chain Lakes in 1948 when we was 8 years old. He was thrilled that "nothing had changed". This seems to me to be the entire issue: Who is it that believes our wilderness is being threatened by overuse? Our experiences verify that is certainly not the average citizen. I think we all know who is promoting this notion.
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. 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 miniscule 7/10 of 1% of the total use and, at the same time, no management of the element at (public) that represents 99.3% of the use! Who is kidding who?

I would like to believe that the relationship between the outfitters/guides and the USFS is as described in the DEIS: "Outfitter committees exist on national forest system level 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."

Specific to the U-Bar, we have invested over $140,000 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 completed 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 it 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.

I, of course, may be hard for you to realize based on the comments that I have made that I did try to 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.

Again, specific to the U-Bar, I am unable to support alternatives I-IV because they all place critical areas of our drainage into Class III. In describing Class III, I quote from the DEIS: "there is less availability of commercial recreation use, due to high level of public use." This statement eliminates any chance of our supporting any of these alternatives.

I really have a very difficult time understanding why so much emphasis in the DEIS is aimed at curtailing outfitters/guides' activities. As stated earlier (based on your own figures), we represent less than 7/10 of 1 percent. Why 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 mr. Joseph R. Bistrisky
Strive strictly to the rules: We must suffer the consequences of having our permits taken away. What more incentive does one need?

For these reasons, we must support Alternative 3. In a less-than-perfect world this seems to be the lesser of the 3 evils. To do anything else would be to allow the future of the U-Bar in grave doubt. In order for this alternative to work, it requires that the USFS and permittee practice the aforementioned art of "partnership" that produces a level of service desirable of the USFS, permittee and the citizenry.

All of us at the U- Bar are dedicated to maintaining that level of service and pledge to continue to work with the USFS in all our efforts.

Sincerely,

Ed Bahr
President
ROCKY MOUNTAIN RECREATION OF UTAH, INC.

(46f) 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.

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 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 provide recreation opportunities, maintain trails, teach wilderness ethics and leave no trace camping techniques.

(46g) Support for Alternative 5 is acknowledged.
1 October 1996

Bert Kulesza
Forest Supervisor
Ashley National Forest
355 N. Vernal Avenue
Vernal, Utah 84078

Dear Mr. Kulesza,

Thank you for the opportunity to comment about the Draft Environmental Impact Statement for Management of the High Uintas Wilderness. I was pleased with the clarity of the proposals and found well thought-out solutions to my questions at the openhouse I attended.

I am in favor of Alternative 1. I have backpacked and horsepacked several times in the wilderness area and find I am comfortable with this compromise alternative as a guideline for maintaining the opportunity for having a good wilderness experience in the high Uinta mountains.

My only real concern is still the method of regulation for those of us who are not likely to use or associate with an outfitting service. I find the suggestion of making parking less available, or 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 denied from a trailhead I would prefer to have that knowledge before the trip is started so another starting point could be considered, or at least contingency plans could be made.

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. Draper
281 East 400 South
American Fork, Utah 84003

(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.
October 10, 1996

Ashley National Forest
Roosevelt Ranger District
455 West Highway 40 (333-6)
Roosevelt, Ut. 84066

Gayne Sears:

I am writing because of the concern I have with your
"Environmental Impact Statement". This statement is unfair and
discriminatory to all Outfitters, and will cause many of them to go
go out of business. This "Environmental Impact Statement" applies
more restrictions and hardships to Outfitters than any other users
in the National Forest. Most of the Forest users are established there by law, but the
Outfitters are not. causing more restrictions for them. Your
statement in Classes I and III limit people and stock to 1 and 7
We talked about overall limits in the L. A. C. This number was
never discussed. The 14 people and 15 horse limit was discussed
and agreed upon. Being an Outfitter, I believe in limiting group
sizes, and we already have this in force.

Your Environmental Impact Statement discriminates against
outfitted people going in the "high-use" areas.

As an Outfitter, I cannot operate on just drop camps in Class
I areas. You have also regulated Class III areas as drop camps.
On the North Slope, your Alternative 1 and 2 make "non-stock
Outfitters available, but the "stock" Outfitters are not allowed to
operate.

I, Henry's Fork and Smith's Fork, I would like to operate more
to Alternative 4 for "drop camps only. The user demand is a need
to operate 50 to 75 user days per season. Your Statement doesn't
have up to date information on present commercial use.

I am not just a hunting outfitter. I also have fishing starting
July 1st. As an Outfitter and Business owner, I need to operate as
Alternative 4 to stay in business. All the other Alternatives will
put existing Outfitters out of business in a very short time.

As Commercial users, your management seems to regulate us and drive us
out of business. It seems there is never a problem with "non-stock" users.

They are allowed to operate anytime and anywhere, with little
restriction or limit. Your people in management seem biased on
their behalf. I feel that the present Outfitter's future in using
the Ashley National Forest is in deep jeopardy. Our needs and concerns are
not being listened to, and the direction is to phase us out. We are
for excellent and good examples in our businesses. Please let us
continue providing our service.

Yours truly,

Ken Aimone

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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
classes 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 travelers visit 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
non-stock Desired Condition description on page 2-2 of the EIS. Permits have
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 exists in some cases
exceeds the O/G criteria mentioned above. This type use is 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 Henry's Fork or Smith's Fork for at least
10 years. Use in Henry's Fork and Smith's 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 disallow outfitting
in certain drainages. In those restricted drainages, the most obvious impacts to
wilderness quality is a threat to solitude. Even when visitors practice
effective 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:
1980-81 200-700 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.
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. 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. We therefore encourage the selection of Alternative Five (No Action) in the final decision document.

Sincerely,

Gale Rasmussen
President
Uintah Basin Chapter
People for the West

(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 on the chart on page 258) will remain closed to permits issued to outfitting. The alternatives propose a service day ceiling for both pack and non-pack 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 the outfitted or non-outfitted public.

All outfitters/guides can and many are developing closer 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.

Since a special use permit is issued by the Forest Service, the public expects the Forest Service to provide quality service through the outfitter. We permit to operate. Analyzing, advertising, selecting, and issuing a permit is expensive. Administering a poor operation is more expensive than a top-quality 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 is 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 Point area. I support the plan you proposed because it addresses the need to protect the environment and still allows reasonable access to the area for the users. 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
Dear Mr. Bistryski:

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)(4). 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, wildlife, 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.
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 user (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/Sm

(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 by 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 need is 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 HuU use stock and 5-20% of those are using more than 7 head of stock.

In order to maintain the integrity of the HuU for future generations of Duchesne County residents, some carefully considered restrictions on behavior and uses are appropriate.

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.

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 further management actions are taken to limit visitation to the HuU (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.
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 management, Duchesne County desires the concept of multiple use be followed in regards to wilderness and outfitter opportunities.

2) Outfitters and Guides should not be restricted from offering services and in the wilderness, and user day caps should not be imposed on the outfitters if they are not also imposed on the public.

3) Duchesne County feels the proposed group size limit of 7 people and 7 stock in Class 1 is arbitrary and does not meet the needs of traditional users of the wilderness, and LDS church functions.

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.

5) Duchesne County prefers alternative #2 over Alternative #1 because there are less Class I areas (therefore less potential restriction).

6) Duchesne County feels that DWR should maintain complete control over fish and wildlife management.

7) Duchesne County constituents like to fish in the high lakes and want a recreational fishery maintained by DWR to meet that expectation.

8) Duchesne County wants to be at the table for discussions on the fisher management MOU.

9) Duchesne County wants to make sure water rights, and dam stabilization language as defined in the UBRP of the CUP is included.

10) Duchesne County does not endorse Alt 5 because they see the benefit of the FS having a tool (Class designations) to manage the UW.

If the above cover the Duchesne County concerns they will be entered in the record for consideration as we 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 with the states agreed to roles and responsibilities in regards to fish stocking. Hunting regulations will continue to be controlled by the State, who will consider recommendations from the Forest Service and other interested groups.

(51i) Comments from the public and discussions at IDA 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 UW. The direction in this document meets the intent.

(51j) Duchesne County and all counties affected are invited to voice their specific concerns to UWR and the Forest Service.

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 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 that the original conditions, depending on what must be done at each site to meet the no hazard criteria.

(51k) Your comment is noted.
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 have it intimately.

My only comment is this: Obey the spirit of wilderness and included in the Wilderness Act and other legislation. It is sad, but the Forest Service is hell-bent on a status-quo course that will destroy the wilderness.

Please use my new address and send me a copy of the decision as soon as it is signed.

Sincerely,

Gary Madderine
PO Box 314
Corvallis, MT 59928
July 14, 1994

Clark Tucker  
District Ranger  
2444 West Hwy 410 (333-6)  
Coeur d'Alene, ID 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
LAC which 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.

Requiring a permit system, even if it is simply
a self-registration permit at the trailhead. This
(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 programmatic direction rather than specific management
actions that you suggest.
East Fork Bluffs), [Chinook Meadows, West Fork
Whitebark (access to the Wist River), Little River
Yellowstone Sub tropical, Cascade Fork, Rock Creek
and Mirror Lake trails]. As in the first
category, pre-season, would be required for
areas which exceed the standard the first
year.

- We may have 3 parties per week (average)
  for George's Fork (Middle Fork Basin), Horse
  Lake and Spirit Lake (access to Burnt Fork Fish-
  and-Ski Trail). As in the first category, pre-
  season, would be required for areas which exceed the standard the
  first year.
- We may have 6 parties per month (average) in the rest of the trails.
  Same unregulated seasons.
- Any area that shows an increase of over 10% are expected to "shake out"
  to a lower category (from 2 parties to 1 party per day).
- No duplicate trails should be added until some areas should become
  trail-less (primarily because) the 52F trails include West Fork Baseline (it becomes
  a non-maintained trail, parties still go out) at the North (Slope Road / West Fork junction);
  Towaliga Fork (see above); [Glacier Meadows has no
  access (see above)]; North Fork Trail (by the
  Wist River), [parallel the Highway 140], Wist
  River, above the Sheep Creek Bridge. Access
  would be via Atwood Basin or West Fork
  Whitebark trails to the upper Wist (also, this closure

(52f & 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.
would eliminate most traffic on the streams (except Stake Canyon). The Boulder Lake Trail, Jackson Fork/Smith Creek, and Cottonwood Basin will be important access points. Trails in Squaw Basin (lower outlet, 0.7 mi) and Jackso'n Fork (East Fork/Grouse Basin, the Bull Fork/Cottonwood Basin) are used by the Burnt Fork/Lawrence and the Bull Fork Trails.

Trails to be studied for closure include those in Yellowstone (adjacent to Garfield Basin/Surprise Hole), Lake Fork (adjacent to Garfield Basin Trail), and Hamilton/Surprise Hole. The road to upper Rock Creek, Natrona County, is the most of those in upper Rock Creek. The Squaw Basin/Grouse Basin, the East Fork/Surprise Hole, and the lower part of the White River area are considered for access. Also, the goal should be to have a few major mixed trails less, possibilities include East Fork Bluffs, Lake Fork, upper Creata, and Burnt Fork/Beaver Creek (note: I propose closures for the west Fork/Beaver Creek).

52f. Standards for group size will remain as stated on pg 2.14

52g. Group size should be limited to 12 people and for stocks (6 people, 6 stock or a combination that equals 12).

52h. For cross-country travel (no; trails or closed trails), size should be limited to 6 people and stock (3 people, 3 horses or 6 horses). Cross-country travel would not include camping along trail corridors a reasonable distance from trails.
(52) 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 suitable habitat for all sensitive species identified in the Biological Evaluation, and the individual species as they are identified in the area.
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 Upakco 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.

In administering outfitting and guiding permits, managers have and will continue to assign seasonal campers to outfits on a case-by-case basis. Criteria for assigning these sites can be found on page 2-17.
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.

Sincerely,

Gary Macfarlane
NV 1127 Ritchie Street
Pullman, WA 99163
Bert Kulesza  
Forest Supervisor  
Ashley National Forest  
155 N. Vernal Avenue  
Vernal, Ut 84078  

October 14, 1996

Dear Bert et al.,

I was pleased to see the long awaited draft EIS on the High Uinta Wilderness Plan come forth. There are some positive changes from some of the earlier scoping documents.

I'm concerned that the I.D. 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 rush 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, and they are: 1) those areas outside the limits of acceptable change (including the manmade reservoirs), and 2) those areas within the acceptable limits of change.

Of 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 substance.

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 areas 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.
the direction from the platitudes described. Where is the direction to obtain the desired condition? Does this mean that every lake or every drainage can have a can have a meteorologic device, etc.? Does this mean 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 final document will tie it all together in a clear concise document that can be understood by the public 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 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 propose to bring them up to the standards with exceptions noted, like the man caused reservoirs. I submit this would be simpler, better understood by the public, and easier to administer than struggling to impose any artificial classification system. The High Uintas deserve this clear concise 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 the public is being misled, and if the objective is 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 Pontius 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 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 5-11 and 2-3 should be corrected by adding: [Subject to take from hunting and fishing,] “natural processes and the forces of natural selection determine the diversity of wildlife and fish habitat and species.”

(53d) The forest plus 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 degradation away from, the desired conditions.

(53e) Preference for Alternative 5 noted.

(53g) 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. 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 correlative 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 I.D. 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)

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 wide 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 do take a toll on the amount and diversity of wildlife species and these activities are guaranteed in the Wilderness Act. Also in keeping with the statement, "The High Uintas Wilderness area 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.

As this analysis gets headed into the wrong tunnel in the first place (i.e., recreational classification), the resulting indicators and standards for respective resource components and followup 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/ The Wildlife and Fisheries areas, if the "standard is an inventory to be taken," then this is probably unattainable 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 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 acres is defying common sense and compliance.

Firewood Availability (pg 5-23) in the Recreation Component, the standard is a given quantity of "burn acre availability" which is to be determined after baseline data is obtained. This again is 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.

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 "absence 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 absence of maintenance is causing new impacts (paths 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 absence of water control structures. Some level of a trail maintenance standard needs to be established.

Would think it's a fair assumption that the absence of trail maintenance is displacing more soil and vegetation than all the camp sites.

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. 53k

(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, "Twotney (1942) reported that ptarmigan were once common in the high Uintas Mountains with flocks of two to five birds being reported on Bald Mountain near Kamas." C L Heyward (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 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 identified was maintained to provide a place to start gathering the data to monitor in the future.

(53m) Because between 90% and 98% of wilderness visitors travel in groups 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 an 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 5-11 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).
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/treer 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/treer resource.

(53q) 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 campsite 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.

(53r) 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 setback is designed to prevent impact to vegetation and sedimentation. This is done to minimize the need for closing areas to use periodically.

(53s) 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.

(53t) Issuing permits that authorize 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.

(53u) 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 outfiting 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.

Sincerely,

A. Joel Frandsen
Dear Mrs. Kolesar & Wife:

This letter is in response to the draft Environmental Impact Statement for amendment of the High Uintah Wilderness. After reading the proposal, I am in favor of no change at this time. I do not want to see any change in the recreational opportunities reduced for outdoor enthusiasts. If there are specific areas that suffer from closure, I would rather see the Forest Service determine the rehabilitation necessary for these areas individually.

Thank you for the opportunity to participate in regards to this proposal.

Sincerely,
Mike Budwell

(54a) Those recreation opportunities that are within the scope of the Wilderness Acts will be maintained. Support for Alternative 5 acknowledged.
(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...

October 15, 1996

Larry Ayres

Henry Ayres

Draft Environmental Impact Statement for Management of the High Uintas Wilderness

Dear Mr. Kalesza:

In response to your request for our review of the DEIS for the High Uintas Wilderness Management, we prefer Alternative 5 (No Action) for several reasons:

1. By establishing a Condition Class system, it appears that larger group sizes would be discriminated against under Condition Class I.

2. 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 paddling 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.

Therefore, rather than implementing a Class system at continued taxpayer expense, we support upgrading those areas which currently do not meet wilderness standards. Prevailing USDA policy already dictates Forest Service wilderness areas will be managed to protect and restore the wilderness character of the land. Without resorting to further bureaucracy, the tools are actually in place to restore those areas not presently meeting the definition of "wilderness".

After reviewing the DEIS, we find little benefit by employing the proposed Class system and therefore support Alternative 5 (No Action).

Sincerely,

Larry Ayres
U.S.F.S.
Attention: Joe and or Gayne
Subject Draft Management, High Uintas Wilderness

Criteria B:

As outfitters we recognize 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 eliminate 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 co-op with the U.S.F.S. We
have a long term 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 preserving the
fire wood, grass, clean water and cleaning trails from debris when
needed, making travel easy for all.

By nature we steer our clients away from high use areas when ever pos-
sible.

We are not aposed to the class #3 totally, but feel that to prevent
outfitters from having full use, while allowing the public to have
unlimited use would be counter productive.

Criteria D:

On the subject of service days. We would like to see the allotted
amount of days be assigned to the permit and available to us so that we
may build our business to that potential. To be able to add to those
days if the need and the resources 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. Out-
fitter service days should remain at the current level rather then
they are used, with the opportunity of increase where appropriate.

I (Larry) would like to thankyou both (Joe & Gayne) for the meeting
that you had with us outfitters. For the information and explanation
and especially the open minded attitude. Also thank you for the extention
of the commit period.

I have enjoyed working with you this year as representative of the
Rock Creek Ranch and loo forward to the future.

[Signature]
Larry R. Jackson
Rock Creek Ranch

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(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).
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.

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. SS219.7 et seq. [We encourage the Forest Service to abide by this County Ordinance and maintain a strategy consistent with federal law.] 57a

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 Richards, Executive Director

cc: Mr. Dale Bosworth
Uintah County Commission

(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 administrated 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).
CONTACT FORM

Date: 10/31/96
Title of Document: HWW DEIS
Name of Project Coordinator:
Name: Mike Boduchuk
Address: USDA Animal Damage Control
Phone: 901 975-3315
Comments: Wanted to make sure HWW DEIS is compatible w/ ADC EA recently signed

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 See

Signature of Person Commenting: ____________________________

11/93 Handout 2-9

(38a) A Forest Service biologist participated in 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.

Forest Supervisor
Wasatch-Cache National Forest
8238 Federal Building
125 South State Street
Salt Lake City, UT 84138

October 17, 1996

via Teletyper 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 begin 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 (Preservationists) 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, top soil, and wildlife and threatens potential for reintroduction of extirpated species.

THREATENS POTENTIAL FOR REINTRODUCTION OF EXTINGUISHED SPECIES.

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,

Paul K. 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.
Mr. Bernie Weingardt
Forest Supervisor
Wasatch-Cache National Forest
8236 Federal Building
125 South State Street
Salt Lake City, Utah 84138

Dear Mr. Weingardt,


2. We realize that regardless of which Alternative is selected, the Forest Service has a record 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:

   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.

   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.

   c. The current Wasatch-Cache and the Ashley National Forest 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.

   d. 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.

(50b) This statement is one rational for favoring Alternative 5: No Action. Alternative 1, the proposed action, and indeed, all alternatives, allow the UDWWR 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 in-house coordination.
4. 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.

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.

c. There seems to be too much emphasis on fish stocking when this is an activity that primarily rests with the State of Utah. Areas are going to be set aside for no fish stocking then we would hope that the Division of Wildlife Resources concur with that determination. Otherwise, they are being 'put into a corner' which can create conflicts and false public expectations.

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.

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 habitats and other cooperative efforts with the Division of Wildlife Resources to restore and maintain viable populations of these species in the High Uintas?

This concludes our comments. We appreciate 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

Page 2
North Eastern Utah
Outfitters, Packers & Guides Association

Ashley and Wasatch-Cache Forest Supervisors
October 12, 1996
Burt Kuleza and Bernie Weingardt

Dear Mr. Kuleza 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 guidelines. 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 Permits. The first four alternatives are none submitted by the Outfitters and we have been told by Gyno Searl 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.

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.

Forest Law Enforcement statistics reveal that rogue or illegal outfitters outnumber legal permittees 3-1. If you take the legal outfitters out of the wilderness, there will not be a reduction in commercialis guided trips, only legally guided ones.

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.

(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 affect 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. Illegal use 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.

PO. Box 129 • Whiterocks, Utah 84085 • (801) 353-4049
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, corralling recreation (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.

This E.I.S. goes to great lengths to rationalize why Outfitters must sacrifice their use of some of the wilderness areas. It is pointed out that Outfitters are economically insignificant to the local and state economies.

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 8 percent-from 2.5 Billion in 1995. The new transient room tax of 3% has increased the local tax base by 12.3%.

This draft contains outdated and misleading economic indicators which could suggest that other statistics are outdated since the beginning of the L.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 allotted use days. It is pointed out in this draft that there is an over-use which is the reason for this document.

There are reasons why some of the wilderness Outfitters are not filling their quota of use days. Most of them are new owners who are fixing up and improving their guest accommodations, 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.

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. 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. The grants you that there are heavily impacted areas in the wilderness, yet the Outfitters contribute to only 1% of the total use.

(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 appropriate 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 H.U.W 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 O/G 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 H.U.W on the Ashley and Wascatch-Cache National Forests. Some over-use does occur in some areas in the H.U.W. 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 array of opportunities and help managers allocate finite management resources.
Education is the key to protecting our Wilderness areas, 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-weight 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 land and resource 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 seem 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

(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.
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 was booked into the Duchesne County jail after being identified as a police officer and other charges.

Police say 46-year-old Roger D. Horrockes 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 at Martinez's residence.

Martinez had permission from the BIA to set up shop at the location, but Horrockes 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 Capt. Steve Hooley, Martinez knew Horrockes 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, Horrockes allegedly rammed his pickup truck into the victim's camper causing approximately $2,500 in damages.

Martinez drove to his home and called police. Horrockes, who had placed a flashing red light on his pickup, pursued Martinez to his residence where he was later arrested. Two passengers in Horrockes' pickup truck were taken into custody by BIA police and charged with obstruction.

Horrockes, 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.

"Wilderness is supposed 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," the explained.

But Jessup says Forest Service officials are missing the boat when it comes to realizing the benefit the guides provide, not only for the specific segment of the public over 70% of backcountry 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 cleaning 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 accordance 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.

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, Field said. Without parental support policies are ineffective and discipline is met with until the courts become involved.

Duchesne County Commission

289
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 needed management plan addressing these critical 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 non-native 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 enough at stake? We propose too much is at stake to manage the wilderness in such a careless way! Additionally, protecting ecosystems and the biologic diversity they can harbor must be the greatest possible area 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.

62a & 62b 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.

62b 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 ensure that wilderness values are protected when ADC activities take place.

62c We find the proposed alternatives for designing 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 2 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 as the "desired condition" for the class II land. The other alternatives endanger the wilderness to even greater extents. And finally we find it difficult to distinguish between them, whether by definition as in the case of Alternatives 1 and 5, or by the end result we

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 Acts and will protect all UWU 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 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.
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
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
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 mankind 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
unpalatability 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 planners 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 Neal
9973 S. Eden View Court
South Jordan, UT 84095

Members High Uintas Preservation Council

(62d) 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.

(62e) 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.

(62f) 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 Kuleza + Bernie Weintraub,

My name is Gaten R. Mckinnow and I am a student at Earlham College. This summer I participated in the wilderness program in the High Vista for two weeks. It was an amazing experience I had never been hiking before at all and had minimal camping skills. But our leaders taught us greatly about how impact camping & preserving nature one of the greatest parts of the trip that developed the camaraderie amongst us. It was a chance for a small number of us to get to know one another, an interwoven way that has led to ongoing friendship here at school.

(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 overwhelming for me. Nevertheless...)

(63a) Presently, 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 2-15). 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 had in the Sierras with you. Because I think by limiting the number in groups you are cutting down on very valuable resources and opportunities for us all, but especially for Earlham College in particular.

Thank you for your consideration on this matter.

Sincerely,

Helen R. MeMeen

P.S. I have enclosed a picture of most of our group. We are standing on Anderson Pass after an attempt at Kinney's Peak, that was somewhat thwarted due to a large storm coming up while we were climbing. Memory through snow and work and 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 steps toward developing an up-to-date, 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 precedent 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.

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 can help manage 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 1984 Wilderness Acts and with the Forest Service Manual's wilderness management guidelines.

The descriptions 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 p. 5-12). 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 its 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."

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...
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". 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). 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. 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 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
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.

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.

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.

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).

(64) 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.

(64) 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.

(64) 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 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 not to distract from gathering truly useful data.

It is not clear what campsite density (distance between occupied campsites) is attempting to 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 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 occupied campsites that visitors actually perceive through sight 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 a couple of indicators of solitude. Campsites perceived around the lake is one. Another easily monitored indicator would be the number of camp sites visible from trails and/or lakeshores. 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 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 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-emphasize the importance of making the recording of all the data rangers can and should monitor straightforward 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 indicators, but they must be prepared to do so through good training, well designed recording systems, and helpful supervision.

(64p) 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**

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<tr>
<td>Name of Project Coordinator</td>
<td>G. Sears</td>
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<tr>
<td>Name</td>
<td>Eldon Monson</td>
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<tr>
<td>Address</td>
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<tr>
<td>Phone</td>
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<td>Comments</td>
<td>We discussed wilderness in general and 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.</td>
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<td>Signature of Person Commenting</td>
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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 campsites used by an individual or party who compensates an outfitter for packing camp equipment, people, or supplies to or from the site. A 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 campsites 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 wildlife are the components 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 on 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 in order 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 rocks, 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 rocks, gullies, ruts or rilling, 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 Forests and Bureau of Land Management, & Management in the High Uintas Wilderness - FSH 2311 et al). 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 public 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 use, 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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appendix a
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 permits 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.

The following criteria have been selected via a formal documented applicant selection/use allocation process.

1. The applicant has proven financial capability and possesses adequate experience/expertise to operate a successful sustainable business.
2. The most highly qualified applicant(s) has been selected via a formal documented applicant selection/use allocation process.
3. The permit is issued consisting of:
   a. The basic permit
   b. Operating plan, this is for the tenure of the permit
   c. 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, 4153 - 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.

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 public need. The Forest must determine the need based on its 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...
rehabilit.tion. and campsite rehabilitation and
re-iocation)

r "'~no C. Service Days actually wed as
compualto 5CTVice days authorizal This
may refIcc1 either an inc:reasc: or decrease in
aJthorized 5CTVice days. Example I) an
outfitter may be aulhorizal 200 5CTVice daY"
per ___ and for three years running. use
only 100 5CTVice days Unless there ate
extenuating circumstances (weather. fire
clo5urc. business cIIange hands in middle of
___ etc ). this indicates less citizen neal
for commercial outfittins servICes and would
rauh in a decrease in ..thorizal service
days Example 2) an outfitter may be
"lhorizal 200 5CTVice days and for three
years running their actual use bumps this
rllllit At this poim the outfitter can request
more ..thorizaI 5CTVice days if I) there ate
5CTVice days available in that drainage (refer
to 5CTVice day ceirons) and 2) document.tion
.. pre:sental on how they meet these criteria

(""'t,,o F Lakes and trail corridors in
Ouchenne River. Henrys Fork. Smiths Fork
and E.st/Stillwater Forks of the Bear River
drainages ate the least appropriate for
outlining oper"tions because the current
public use meets or exceeds the desiral
conditions for that area

HUW mayor may not completely provide
fo r a viable outfitted business in and of
the nselves Because the Agency recognizes
a >uitable profit margin is prerequisite to
mai ntaining a high quality operation. the
number of authorized operators will be
limited to aid in providing a profitable supply
and demand ratio

('''''''0 G. Outfiner knowlalge of area.
safety. equipment and quality of business and
customer service.

PRESENT P RLiC USE
COMP,\REO TO COMMERCIAL
USE

• Gui1e. knowlalge of the High Uintas.
incl ••ding years and type experience in the
bu~ness

Livtstock. About 15-20"10 of the visitors to
this wilderness use livestock to assist with
their trip Many of the local repeat visitors
who usc stock have the necessary equipment
to conduct a trip without the use of an
outliner 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 usc of an out finer For those
visitors that do not have the desire or
capability to obtain the skills and equipment
for i,vesto<k trips an out finer is almost a
prereq!lisite for them to have this
opportunit The districts have been asked
by non-resident for names of outfiners that
mIght be operating in the High inta
Wilderness

• Safety practices an.: training
• Condition of stock. tack and camping
equipment
• Client evaluations of service and use of
generally acceptal accounting and business
practices

("' /""'0 fJ. Documental citizen reque IS

over IUM for particular commercial services

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bilit of the agene to monitor
oisting permits for cornpfiance with the
forest pbn and special use permit
requlremmu This may include

• Self-monitoring of operating plan
requircmem (i e perminec evalu.tion of
gher use areas u ng photogr.ph camp';te
monnonfttl. etc )
gcncy bud et allowance for proper and
dTccmc actmimSlratlOft . nd monllonn of
liner permlu

CONCLUSION
Based on I) managers' neal for assistance in
accomplishing wilderness management
objectives. 2) the need to pro" ide 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
tewardshlp of the ~Iigh Intas Wilderness
Based on I) the relallvel shon use suson
(three to four months depending on the
wrather (. 2) the current high public use . • nd
1) the .v....bility of non-w"derness areas for
commer"al out final oper.llons. the scrvlCe
days Ivallable for outfinal operations In the

Non-livestock. About 80-85% of the visitors
to this wilderness do not use livestock to
assist with their trip Mo t of the present
non-live tock out finer/guide u e is from
non-local vi itor

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PRESENT COMMERCIAL USE
(l996d.t.)
There are currently 10 existing
out finer/guide permittees in the High Uintas
Wilderness Thiny-live percent of the
out final use is .,.,s:ed willI stock. and 65%
IS non-stock
There are two hunting outfitters (300 service
days each. use period: 911 t" end orrall
season) for the north slope and a maximum
of five hunting and fishing outliners on the
south slope (no service day limit. use period:
711 to end of the fall season).
There arc also four alucationaUinstitutional
(non-stock) outlitters. These outfitters use
both the north and south slopes of the
wilderness. A service day ceiling is not
identilied. however O/G use is discouragal
from using highly popular basins and
trailheads
South Slope

I I-Ha, W,IJo",..,.. . RalH:h. Operates from the

-Bar Wilderness Ranch locatal in Uinta
Canyon (Reson Permit) This outliner
provides public opportunities for both
wilderness and non-wilderness outlittal and
guided pack trips for drop camps. fishing.
hunting. sight-seeing. cRbin rentals and other
recreation activities The have been
operating in the High intIS for 10+ year
from this location (changal hands three
time ) and are authorizal service days both
on and out ide the wilderness (An annual
permit)


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. (Presently 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 pack 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 Aime Outfitters. Operates in Burnt Fork and Beaver Creek drainages. Provides public opportunities for wilderness and non-wilderness outfitted 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 in 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)

---

### HUW Outfitters and Guides Service Days

#### maximum authorized per drainage

<table>
<thead>
<tr>
<th>DRAINAGE</th>
<th>Alternative 1</th>
<th>Alternative 2</th>
<th>Alternative 3</th>
<th>Alternative 4</th>
<th>Alternative 5</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>stock</td>
<td>non-stock</td>
<td>stock</td>
<td>non-stock</td>
<td>stock</td>
</tr>
<tr>
<td>1. Duchesne</td>
<td>0</td>
<td>0</td>
<td>50</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2. Rock Creek</td>
<td>300</td>
<td>200</td>
<td>300</td>
<td>200</td>
<td>50</td>
</tr>
<tr>
<td>3. Lake Fork</td>
<td>350</td>
<td>600</td>
<td>350</td>
<td>600</td>
<td>650</td>
</tr>
<tr>
<td>4. Yellowstone</td>
<td>300</td>
<td>550</td>
<td>300</td>
<td>550</td>
<td>300</td>
</tr>
<tr>
<td>5. Uinta</td>
<td>300</td>
<td>450</td>
<td>200</td>
<td>300</td>
<td>75</td>
</tr>
<tr>
<td>6. Burnt Fork</td>
<td>150</td>
<td>0</td>
<td>150</td>
<td>150</td>
<td>25</td>
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<tr>
<td>7. Beaver Creek</td>
<td>150</td>
<td>0</td>
<td>75</td>
<td>150</td>
<td>50</td>
</tr>
<tr>
<td>8. Hennys Fork</td>
<td>0</td>
<td>150</td>
<td>0</td>
<td>150</td>
<td>100</td>
</tr>
<tr>
<td>9. Smiths Fork</td>
<td>0</td>
<td>300</td>
<td>0</td>
<td>300</td>
<td>125</td>
</tr>
<tr>
<td>10. EAVW Black Fork</td>
<td>250</td>
<td>300</td>
<td>250</td>
<td>250</td>
<td>200</td>
</tr>
<tr>
<td>11. East Stillwater Fork Bear</td>
<td>50</td>
<td>0</td>
<td>50</td>
<td>50</td>
<td>25</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td>1850</td>
<td>2550</td>
<td>1475</td>
<td>2550</td>
<td>1300</td>
</tr>
</tbody>
</table>

*administrative limit service days limit defined by managers taking into account acceptable resource and social conditions
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, x and 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.

High Uintas Management EIS
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 relocation, 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

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 that 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:

1. 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 fire 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 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.
PLAN DEVELOPMENT AND IMPLEMENTATION

Table A-1. Those strategies that occurred during the Plan development and implementation, and subsequent changes.

<table>
<thead>
<tr>
<th>Action Item</th>
<th>Who</th>
<th>When</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop presentations for in-house and public meetings on plan development and final plan content, develop follow-up presentations after plan implementation.</td>
<td>Working Team, Forest FMO, Fire Staff, District FMOs, Forest PACs.</td>
<td>Before and after final plan approval.</td>
</tr>
<tr>
<td>Develop presentations for the public to educate them on prescribed natural fire in the High Uinta Wilderness.</td>
<td>Forest FMO, Fire Staff, District FMOs, Forest PACs.</td>
<td>On-going after final plan approval.</td>
</tr>
<tr>
<td>Prepare and distribute media release on plan development and implementation and any major revision.</td>
<td>Forest FMO, Fire Staff, District FMOs, Forest PACs.</td>
<td>Before and final plan approval.</td>
</tr>
</tbody>
</table>

ANNUAL FIRE SEASON INVOLVEMENT

Table A-2. Those communication strategies that occur pre-season to disseminate information to adjacent forests and wilderness users.

<table>
<thead>
<tr>
<th>Action Items</th>
<th>Who</th>
<th>When</th>
</tr>
</thead>
<tbody>
<tr>
<td>Keep appropriate fire officer(s) briefed on current and expected</td>
<td>Prescribed Fire Management Officer</td>
<td>At initial fire start, then as needed or</td>
</tr>
<tr>
<td>Post “FIRE CAUTION” signs at appropriate wilderness portals, Coordinate with adjacent Forests and Districts.</td>
<td>Prescribed Fire Management Officer, District Ranger, District Resource Managers, District FMOs.</td>
<td>When a prescribed natural fire and/or wildfire is burning in the area.</td>
</tr>
<tr>
<td>Determine need for fire closure, Prepare special orders as appropriate.</td>
<td>Fire Supervisor, District Ranger, Prescribed Fire Management Officer, District Resource Assistant.</td>
<td>Determined by current and expected fire status.</td>
</tr>
<tr>
<td>Post “FIRE CAUTION” signs at appropriate wilderness portals and offices. Coordinate with adjacent Forest and Districts, and media.</td>
<td>Prescribed Fire Management Officer, District Ranger, District Resource Assistant, Forest PACs.</td>
<td>Whether closure is put onto effect for area, trail and/or road.</td>
</tr>
<tr>
<td>Keep appropriate political contacts (Federal, State, Tribal and Local) appraised of current and expected prescribed natural and/or wildfire status.</td>
<td>Regional Officer, Forest Supervisor, Forest Fire Staff, Forest FMO, District Rangers, Prescribed Fire Manager, Forest PACs.</td>
<td>As appropriate based on National, Regional, and local fire situation.</td>
</tr>
<tr>
<td>Keep appropriate in-service personnel (wilderness rangers, clerks, etc.) briefed on status of wilderness fire situation.</td>
<td>District Ranger Staff, Prescribed Fire Management Officer, Resource Officer.</td>
<td>As fire status changes.</td>
</tr>
<tr>
<td>Keep appropriate out-service personnel (visitors, outfitters, local conservation, landowners, etc.) briefed on wilderness fire situation.</td>
<td>Forest Supervisor, Fire Staff, Forest FMO, District Rangers, Prescribed Fire Management Officer.</td>
<td>As fire status changes.</td>
</tr>
</tbody>
</table>

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:

- Prescribed Fire Management Officer
- Forest Supervisor
- District Ranger
- Prescribed Fire Manager

For further information, refer to the High Uinta Management EIS.
### Table A-3. Those strategies planned for the times when a prescribed natural fire and/or large wildfire is burning. The primary thrust of this phase is information dissemination.

<table>
<thead>
<tr>
<th>Action Item</th>
<th>Who</th>
<th>When</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prepare news releases for local, regional and national news media as appropriate</td>
<td>Prescribed Fire Management Officer; Forest Fire Staff; Forest P.M.O</td>
<td>As needed or requested</td>
</tr>
</tbody>
</table>

### POST SEASON

### Table A-4. Those strategies planned for post-season information gathering and dissemination needs.

<table>
<thead>
<tr>
<th>Action Item</th>
<th>Who</th>
<th>When</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prepare news articles at the end of the fire season summarizing the past season’s fire activity</td>
<td>Forest FMO; Forest Fire Staff; District FMO; Forest FMO; Wilderness Managers</td>
<td>November of each year if there were fires that warranted a report</td>
</tr>
<tr>
<td>Discuss prescribed natural fire program at annual coordination meeting of High Uintas Wilderness managers</td>
<td>District Staff; Forest FMO; Forest Fire Staff; Wilderness Rangers</td>
<td>Annually</td>
</tr>
<tr>
<td>Ensure temporary special orders have been rescinded and signs and posted orders removed from trailheads</td>
<td>District Staff</td>
<td>Each fall prior to hunting season or as soon as special orders are rescinded if an incident during hunting season</td>
</tr>
<tr>
<td>Distribute results of monitoring and evaluation via media release</td>
<td>Forest FMO</td>
<td>Annually</td>
</tr>
<tr>
<td>Include monitoring and evaluation results in Forest’s Annual Monitoring and Evaluation Report and High Uintas Wilderness Report</td>
<td>Forest Prescribed Natural Fire Coordinator; District FMO</td>
<td>Annually</td>
</tr>
</tbody>
</table>

### 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 2987.8 acres.

There is physical (fire scars) and documented (Graham Journal, 1871) evidence that there were widespread 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 Duschesne 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 fires 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.
Appendix B

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 boundary of the High Uintas Wilderness. The first location is along the northwest border 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 area.

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

Table A-6. Total Downed Woody Fuel Loading

<table>
<thead>
<tr>
<th>Sample Area</th>
<th>Number of Sample Stands</th>
<th>Total/Acre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evantite R.D., Wasatch-Cache NF</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Mt. View R.D., Wasatch-Cache NF</td>
<td>8</td>
<td>11</td>
</tr>
<tr>
<td>Duchesne R.D., Ashley NF</td>
<td>4</td>
<td>14</td>
</tr>
</tbody>
</table>

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.
risk that natural igniters 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) analyses, 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 fire 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

1. Use planned ignitions and/ or mechanical fuel manipulation outside the wilderness boundary, as specified in FSM 2324
2. Use planned ignitions inside the wilderness boundary where wilderness management objectives and conditions are met
3. 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 than 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>
<thead>
<tr>
<th>Fuel Loading (tons/acre)</th>
<th>Loading Class</th>
<th>Percent of Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 - 2</td>
<td>Light</td>
<td>33 %</td>
</tr>
<tr>
<td>2 - 5</td>
<td>Medium</td>
<td>39 %</td>
</tr>
<tr>
<td>5 -</td>
<td>Heavy</td>
<td>28 %</td>
</tr>
</tbody>
</table>

Seventy-two percent of the plots had loadings of small fuels (less than three inches in diameter) in the light to medium loading class. Table A-6 shows total downed woody fuel loading of greater than five tons/acre at plots located around the High Uintas Wilderness which were sampled in the past 10 years.

<table>
<thead>
<tr>
<th>Loading Class</th>
<th>Percent of Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td>Light</td>
<td>33 %</td>
</tr>
<tr>
<td>Medium</td>
<td>39 %</td>
</tr>
<tr>
<td>Heavy</td>
<td>28 %</td>
</tr>
</tbody>
</table>

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.

7. Contrast the number of outfitters and camps that were successfully relocated with those that were not successfully relocated. Evaluate the results.

8. 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.

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.
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
REFERENCES

Aldrich, D F. 1973. Wilderness Fire Management: planning guidelines and inventory procedures. USDA Forest Service, Region 1, Missoula, MT.

Barker, M F. 1993. Barker's Bible on Outfitting, comprehensive compilation of direction pertaining to outfitting on National Forest System lands. USDA Forest Service, Region 1.


Stankey, G H. 1973. Visitor perception of carrying capacity. Intermountain Forest and Range Experiment Station, Ogden, UT. USDA Forest Service re sp. pap. INT-142.


Utah Division of Wildlife Resources. 1993. Uinta mountain trailhead survey. Salt Lake City, UT.

Where a system (identified on the map) trail passes through a Class I zone, the trail is considered Class II.

Alternative 1:
- Increase resource protection
- Minor change from no action alternative

<table>
<thead>
<tr>
<th>Class</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class I</td>
<td>23%</td>
</tr>
<tr>
<td>Class II</td>
<td>58%</td>
</tr>
<tr>
<td>Class III</td>
<td>9%</td>
</tr>
</tbody>
</table>
HIGH UINTAS WILDERNESS

Where a system (identified on the map) trail passes through a Class I zone, the trail is considered Class II.

Alternative 2:
- Increased access
- Minimize restrictions

<table>
<thead>
<tr>
<th>Class</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class I</td>
<td>14%</td>
</tr>
<tr>
<td>Class II</td>
<td>61%</td>
</tr>
<tr>
<td>Class III</td>
<td>25%</td>
</tr>
</tbody>
</table>
HIGH UINTAS WILDERNESS

Where a system (identified on the map) trail passes through a Class I zone, the trail is considered Class II.

Alternative 3:
- Maximize protection of wilderness resources
- Increase potential for solitude

<table>
<thead>
<tr>
<th>Class</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class I</td>
<td>40%</td>
</tr>
<tr>
<td>Class II</td>
<td>58%</td>
</tr>
<tr>
<td>Class III</td>
<td>2%</td>
</tr>
</tbody>
</table>
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%
Alternative 5:
- No action
- Continue to use current forest plan direction (no classes)