



## State of Utah

SPENCER J. COX  
*Governor*

DEIDRE M. HENDERSON  
*Lieutenant Governor*

## Department of Natural Resources

JOEL FERRY  
*Executive Director*

## Public Lands Policy Coordinating Office

REDGE B. JOHNSON  
*Director*

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Submitted via electronically: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=63728>

Justin Robinson  
District Ranger  
Evanston Mountain-View Ranger District  
1565 South Hwy 150 Ste A  
Evanston, WY 82930

Re: **Anadarko Vegetation Management Project**  
RDCC Project No. 85368

Dear Mr. Robinson:

The State of Utah (State), through the Public Lands Policy Coordinating Office, appreciates the opportunity to review the Draft Environmental Assessment (EA). The State supports Alternative B, the Action Alternative, that addresses the existing conditions of vegetation and riparian areas located on the North Slope of the Uinta Mountain Range. In collaboration with the Utah Department of Agriculture and Food and the Utah Division of Wildlife Resources (DWR), the State offers the following scoping comments for your consideration.

### **Livestock Grazing**

This proposal to complete fuels reduction and vegetation management activities in the Evanston Mountain-View Ranger District will yield positive long-term results for the forest. Reducing catastrophic wildfire fuels, vegetation treatments, and aspen restoration projects will help meet the purpose and need of the proposed project.

Utah's aspen stands are declining alongside aspen stands throughout the nation.<sup>1</sup> These declines are attributable to the spread of insects and diseases,<sup>2</sup> differing fire regimes,<sup>3</sup> and conifer invasion.<sup>4</sup> Aspen stands support a substantial number of plant and animal species and are vital for the diversity of Utah's environment and ecosystems.<sup>5</sup>

Research shows that active management improves the health and reproduction of aspen stands.<sup>6</sup> Stand thinning at mid-age resulted in greater basal area and increased reproductive stems.<sup>7</sup> In addition to thinning, bulldozing aspen stands has been shown to increase the root suckering more than other types of management.<sup>8</sup> Prescribed fire is an additional tool that helps regenerate aspen stands.<sup>9</sup> Due to the decline in this vital type of ecosystem, it is extremely important that the Forest Service maintain the ability to access, treat, and maintain aspen stands on the Uinta-Wasatch-Cache National Forest (UWCNF).

It is important to recognize that both domestic livestock and other large ungulates can impact aspen resilience and clones. The State requests that the Forest Service communicate and collaborate with the livestock grazing permittees that may be affected by this project. Especially in instances of management adjustment, the permittees need to be aware of the Forest Service's intentions and collaborate to implement voluntary best management practices. Eleven allotments exist within the project area and these areas have been grazed since the early-mid 1900s.

The Forest Service should identify the livestock allotments that will be impacted by the proposed treatments, the number of head months that may be temporarily unavailable, and alternative forage areas that can be provided to permittees that face temporary head month reductions in treated areas. Losing head months, even temporarily, can have serious economic impacts for permittees and are hard to sustain financially unless alternative sources of forage are provided.

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<sup>1</sup> Bartos, D. L. 2001. Landscape Dynamics of Aspen and Conifer Forests. Aspen Bibliography Paper 782.

<sup>2</sup> Marchetti, S. B., Worrall, J. J., Eager, T. 2011. Secondary Insects and Diseases Contribute to Sudden Aspen Decline in Southwestern Colorado, USA. Canadian Journal of Forest Research 41: 2315-2325.

<sup>3</sup> Bartos, D. L. 2001. Landscape Dynamics of Aspen and Conifer Forests. Aspen Bibliography Paper 782.

<sup>4</sup> Smith, A. E. and Smith F. W. 2005. Twenty-Year Change in Aspen Dominance in Pure Aspen and Mixed Aspen/Conifer Stands on the Uncompahgre Plateau, Colorado, USA. Forest Ecology and Management 213: 338-348.

<sup>5</sup> Kuhn, T. J., Safford, H. D., Jones, B. E., Tate, K. W. 2011. Aspen (*Populus tremuloides*) Stands and their Contribution to Plant Diversity in a Semiarid Coniferous Landscape. Plant Ecology 212: 1451-1463.

<sup>6</sup> Perala, D. A. 1991. Renewing Decadent Aspen Stands. USDA Forest Service. Grand Rapids, Minnesota.

<sup>7</sup> Mueggler, W. F. 1994. Sixty Years of Change in Tree Numbers and Basal Area in Central Utah Aspen Stands. USDA Forest Service Research Paper No. INT-RP-478.

<sup>8</sup> Shepperd, W. D. 1996. Response of Aspen Root Suckers to Regeneration Methods and Post-Harvest Protection. Aspen Bibliography Paper 1655.

<sup>9</sup> Fule, P. Z., Cocke, A. E., Heinlein, T. A., Covington, W. W. 2004. Effects of an Intense Prescribed Forest Fire: Is it Ecological Restoration? Restoration Ecology 12 (2):220-230.

Overall, the Anadarko Vegetation Management project would improve the health and sustainability of the forest by reducing hazardous fuel loads on the proposed 68,298 acres in the UWCNF.

### Wildlife

The Utah Division of Wildlife Resources (DWR) supports the Anadarko Vegetation Management Project and anticipates vegetation and fuels treatments will increase the species and age-class diversity of forested lands within the project area while simultaneously restoring wildlife habitat and reducing the risk of catastrophic wildfire on 68,298 acres. The Project area encompasses important habitats for wildlife, including elk, mule deer, moose, black bear, Bonneville cutthroat trout, Colorado River cutthroat trout, beaver, mountain lion, boreal toad, dusky grouse, and many other avian species.

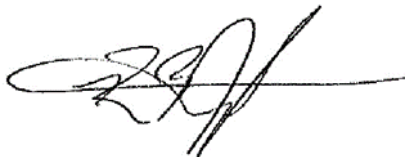
Utah's [Mule Deer Statewide Management Plan](#) identifies the importance of vegetation treatments to improve aspen communities affected by conifer encroachment. Utah's [Statewide Elk Management Plan](#) identifies the close relationship between elk and aspen for summer forage and calving cover. Aspen regeneration also enhances upland bird habitat. The results of vegetation treatments promote the goals and objectives of [Utah's Wildlife Action Plan](#) for habitat improvement and healthy wildlife populations.

The DWR [Strategic Plan](#) goals and objectives include *maintaining existing wildlife habitats and increasing the quality of critical habitats and watersheds throughout the state*. The goals of the Anadarko Vegetation Management Project align with this Strategic Plan, especially through collaborative partnerships. DWR applauds this multi-stakeholder effort to help maintain healthy landscapes for wildlife and watersheds.

### Conclusion

We greatly appreciate the work of the USFS to move this project forward and reiterate the State's support for the Alternative B, the Action Alternative. Please call if you have further questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'RBJ', with a long horizontal line extending to the right.

Redge B. Johnson  
Director