



*The Mission of the Mule Deer Foundation is to ensure the conservation of mule deer, black-tailed deer, and their habitat.*

Daniel Jauregui  
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Re: Strawberry Ridge Vegetation Management Project Draft EA #64510

Submitted electronically at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=64510>

06 Oct 2023

The Mule Deer Foundation (MDF) has reviewed the Strawberry Ridge Vegetation Management Project EA and supports the Uinta-Wasatch-Cache National Forest's (UWCNF) efforts to restore aspen ecosystems, increase vegetation age and structural diversity, restore riparian habitat, and reduce hazardous fuel loads. We appreciate the opportunity to review and comment on the project's Draft Environmental Assessment. MDF is a non-profit conservation organization dedicated to ensuring the conservation of mule deer and black-tailed deer and their habitat across the west. For 35 years, our organization has been involved in efforts to conserve wildlife habitat across Utah and the West, including partnering with the Uinta-Wasatch-Cache National Forest to help further those efforts on the forest.

The actions proposed both directly improve and help proactively protect habitat for mule deer and other wildlife across the forest. Integrated use of forestry and habitat management methods, such as prescribed fire, or mechanical and hand thinning should benefit the project area by helping to restore aspen and riparian ecosystems, address forest health concerns in the wake of spruce beetle and balsam wooly adelgid infestations, bring fire return intervals and potential intensities back into historic ranges and encourage diversity in forest structure and species composition.

Much of the project area is high-value summer range for mule deer, where they rely on native forbs and shrubs to renew fat reserves depleted over winter and to meet the energetic demands of does nursing their spring-born fawns. Research in Utah and elsewhere shows the importance of summer range on fawn recruitment, susceptibility to predation, and fawn/adult winter survival. Intact, abundant forage dispersed among low-growing security cover provides both food and shelter for the herds. Healthy aspen stands, improved timber stand diversity and targeted disturbance (as opposed to high-intensity wildfire) designed with fire mitigation in mind should help establish and maintain those habitat features.

MDF appreciates the UWCNF's willingness to responsibly engage in large-scale NEPA analysis to address known issues on the forest. As we've seen in other places around the West, the needed pace and scale of habitat restoration demands administrative efficiency and a proactive urgency that translates to acres accomplished before emergency thresholds are passed. We encourage the UWCNF to continue their collaboration with the many conservation partners and stakeholders in Utah to incorporate expert technical assistance on stream restoration, forestry, watershed health and wildlife use and management.

There were a few points that I felt called for clarification, more detail, or as food-for-thought during subsequent project design. They may very well be covered elsewhere or implied through terminology but weren't immediately evident. As follows:

- Stream channel and riparian restoration language primarily addresses Large Woody Debris in stream and riparian areas. If not already covered by other NEPA or approved

management policy, consider addressing potential for supplemental native riparian plantings (eg. willow transplanting) and low-tech wet meadow restoration techniques (eg. Zeedyk structures).

- Security cover for big game in large, open meadow complexes or near perennial water sources encourages their use. Variable density thinning or lop-scatter specifications can be used for leaving some small 'islands' of cover in the form of dense shrub or conifer clusters.
- To the extent possible, conduct aspen restoration treatments in closely-timed, large blocks to enable 'saturation' of regenerative growth. This should limit suppression from livestock and wildlife browsing by distributing them over multiple stands or units.
- Where possible, work with grazing permittees to allow for voluntary rest/rotation or limited stocking period in treatment areas that require planting or that are expected to regenerate from little-to-no existing understory.
- Appendix B, Range item 2 (pg.55) states range fence may need to be extended post-treatment. MDF strongly encourages implementing with a wildlife-friendly design if such extensions are needed.
- Appendix B, Fireline Construction item 4 (pg.59) references seeding of disturbed areas. In these areas, as well as reclaimed temporary roads, large skid trails, landing pads, etc. MDF strongly encourages using multi-species native seed mixes with a significant forb component. A diverse mix adapted to site conditions will provide improved habitat and help limit invasive/noxious weed establishment.
- Already addressed well in the document, but management emphasis should be kept on effective closures and restoration of the 73 miles of proposed temporary roads, and on *sustained* invasive/noxious weed control in disturbed areas. The habitat and wildlife impacts from these issues both overlap and are individually serious. Too often throughout the West, we've seen the effects of increased pressure on big game and significant habitat loss when these issues aren't dealt with quickly and completely.

MDF applauds the value placed on wildlife habitat and recreation by the UWCNF, particularly in a Utah Game Management Unit that supports more than 7,500 hunters each season. High-quality public access for hunting and other outdoor recreation is a key part of what makes the area special. Addressing issues with state-of-the-science and socially conscious decisions should give these habitat projects the highest potential for success. The Mule Deer Foundation hopes to see a supported decision to proceed with proposed treatments. The resulting protections and improvements to water quality, wildfire risk, mule deer and other wildlife habitat, and the broad social benefits are undeniably worth the effort. Thank you for your time today.

Sincerely,



Evan DeHamer  
Regional Conservation Coordinator - Utah  
Mule Deer Foundation