



State of Utah

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October 2, 2023

Submitted electronically: comments-intermtn-uinta-heber@usda.gov

Daniel Jauregui
District Ranger
Heber-Kamas Ranger District
Uinta-Wasatch-Cache National Forest
2460 South Highway 40
Heber City, UT 84032

RE: **Strawberry Ridge Vegetation Management Project – Scoping Comments**
RDCC Project No. 85601

Dear Mr. Jauregui:

The state of Utah (State), through its Public Lands Policy Coordinating Office (PLPCO), appreciates the opportunity to submit scoping comments on the Uinta-Wasatch-Cache National Forest's Strawberry Ridge Vegetation Management Project (the Project). As stated in the draft environmental assessment dated September 2023, the project would use a variety of vegetation treatment measures to reduce hazardous fuel loads and improve forest health and wildlife habitat across a 93,674-acre landscape, over a period of ten years. The State supports the vegetation management project and offers the following scoping and technical comments for your consideration.

Purpose and Need

The State concurs with the purpose and need for the project, which is to “improve forest health outlook and reduce the probability of high severity fire in conifer stands by reducing stand density and horizontal/vertical connectivity of fuels; improve aspen vegetation types by creating stand diversity in single age class stands, remove conifer encroachment, and return fire to mimic historical fire regime; reduce fuel loading caused by the beetle epidemics to reduce the probability of high severity fire; and reduce the threat of balsam wooly adelgid (BWA) on all age classes of subalpine fir and white fir.” The State encourages the Uinta-Wasatch-Cache National Forest to execute this project and similar projects elsewhere in the forest in the future.

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Consistency with State Resource Management Plan (RMP)

The State and its counties have adopted Resource Management Plans (RMPs), which include policies for many aspects of public land management, including forest management. These policies promote active, adaptive management of the forests of the State to improve forest health, watershed health, and water yields, improve wildlife habitat and forage for livestock, reduce fuel loads, and decrease the chance for uncharacteristic wildfire and the resultant impacts on air and water quality. Active forest management will also promote the growth of tree stands that can efficiently produce oxygen, store carbon, and eventually be harvested to meet the needs of our nation for lumber and other forest products. The State requests that actions taken by the Uinta-Wasatch-Cache National Forest be consistent with these state and local plans and policies to the greatest degree possible.

The State RMP contains several Fire Management policies that are applicable to the Project. The State finds that the Project is consistent with the following State policies:

- *The primary goal of all fire management decisions will be firefighter and public safety. At no time will the preservation of property or natural resources take higher priority than human life safety.*
- *The State supports the Catastrophic Wildfire Reduction Strategy and the National Cohesive Strategy.*
- *The State will pursue opportunities to conduct and assist other partners with fuel reduction work including mechanical treatments and prescribed fire.*
- *The State supports the efforts of the Utah Watershed Restoration Initiative and other rehabilitative efforts throughout the state.*
- *The State will advocate for forest management practices that promote species diversity and overall ecosystem health.*
- *The State encourages local jurisdictions to prevent wildfires, prepare their residents for wildfire and reduce their fuel load by entering into cooperative agreements that give incentive for those actions.*
- *The State supports the Watershed Restoration Initiative to encourage reduced wildfire acreage and suppression costs, reduced soil loss from erosion, reduced sedimentation and storage loss in reservoirs, improved water quality and yield,*

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improved wildlife populations, increased forage, reduced risk of additional federal listing of species under the Endangered Species Act, improved agricultural production, and resistance to invasive plant species.

The State RMP contains several findings associated with Forest Management including the following:

“A healthy forest is one that provides a multitude of benefits including, but not limited to; increased oxygen production and cleaner air, watershed protection, wildlife habitat, wood and other forest products, livestock grazing, recreation opportunities, and beauty. When too many trees and plants are competing for space, sunlight, water, and minerals in the soil, the trees can become stressed. Stressed trees are more susceptible to insect and disease outbreaks. Much like plants in a garden, some trees occasionally need to be removed (thinned) to provide for the health of those that remain. Fire is nature’s way of thinning the forest. With an ever-increasing number of people building homes in the forest, as well as an emphasis on fire suppression, natural fire regimes have largely been removed from the system.

Some forests have too few trees or too few species of trees to provide the full range of ecological and economic benefits. This may be a result of fire, insect or disease outbreak, or human activities such as excessive visitation, motorized vehicle use, excessive logging, or overgrazing.

Accumulation of large amounts of woody debris and increased fuel loads coupled with mortality-causing disturbance regimes (e.g., fire, insects and pathogens) exacerbate the potential for catastrophic wildfire. Research shows these conditions are often inconsistent with historical patterns of forest development. Some far-reaching impacts include changes in hydrologic function, nutrient cycling, and introduction of noxious and invasive species.

According to data from 2014, the average net annual growth of trees in Utah is - 4,556 thousand cubic feet per year. This shows that trees are dying faster than they are growing.

Significant issues impacting the timber resources in Utah include declining forest health, productive capacity of forest ecosystems, fragmentation, and socio-economic concerns. Due to a lack of active vegetation management, forests in Utah have become more susceptible to intense wildfire, insects, and diseases. By ensuring that forests are managed and kept healthy, they will continue to provide benefit to the public.”

The Project is consistent with the State Forest Management findings above.

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The State RMP contains several Forest Management policies that are applicable to the Project. The State finds that the Project is consistent with the following State policies:

- *Support the sustainable removal of conifers to promote the establishment of aspen and attendant grass, forbs and shrubs where appropriate.*
- *Encourage timber harvesting to prevent fuel load and biomass buildup.*
- *Encourage prompt removal and salvage of drought, fire, and beetle killed timber and reseed or replant as appropriate to maintain healthy forests and watersheds.*
- *Support the use of all appropriate silvicultural methods to reduce the risk of damage due to insects, disease and fire.*
- *The State encourages Agencies to adopt and maintain scientifically sound forest management policies based on current, high quality data to pursue multiple use of public forest resources to provide sustainable yield of timber, forage, firewood, wildlife, fisheries, recreation, and water.*
- *Encourage and promote cooperation by other land management agencies (State, private and federal,) employing ecosystem management, forest health and stewardship principles.*
- *Support the management of forestlands not suitable for commercial harvest to maintain forest cover species with emphasis on production of other forest resources and uses.*
- *Support harvest of forest products when the activity would improve water production and/or does not adversely affect water quality.*
- *Encourage where feasible, the harvest of forest products in areas of proposed or existing vegetation treatments to offset costs of treatments and reduce the need for additional site entries.*
- *Support the use of mechanical or chemical means or fire to alter or perpetuate forests and increase herbaceous yield where timber harvest is impractical or demand does not exist.*

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Consistency with County Resource Management Plans (RMPs)

The Project is located within Utah and Wasatch Counties. The Utah and Wasatch County RMPs (which may be found at: <https://utah-resource-management-planning-plpco.hub.arcgis.com/pages/county-management-plans>).

The Utah County RMP contains the following fire management policies and desired management practices applicable to the Project:

Policies:

Work with the Utah Division of Forestry, Fire and State Lands to implement the Wildland Fire Plan and to reduce wildfire hazard in the wildland-urban-interface on public lands.

Wildland fire should be utilized to protect, maintain, and enhance resources and, when possible, will be allowed to function in its natural ecological role.

The county supports comprehensive fire management that helps reduce catastrophic wildfires.

The county values fire management as a protection for the aesthetic beauty of the county, the local economy, and the citizens of the county.

Desired Management Practices:

Use pre-planned prescribed fire resulting from planned or unplanned ignitions to accomplish resource management objectives, such as reducing fuel load build-up, range or wildlife habitat improvement, etc.

Fuel reduction in forests is managed through silviculture, timber harvesting, and livestock grazing.

The Project is consistent with the above fire management policies and desired management practices of the Utah County RMP.

The Utah County RMP contains the following forest management policies and desired management practices applicable to the Project:

Policies:

Encourage timber harvesting to prevent fuel load and biomass buildup.

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Utah County encourages federal and state agencies to adopt and maintain scientifically sound forest management policies based on high quality, recently acquired data and to pursue multiple use of public forest resources to provide sustainable and continuous yield of timber, forage, firewood, wildlife, fisheries, recreation, and water.

The county supports prescribed burns as a fuels reduction management tool for resource enhancement when used in conjunction with forest thinning and post treatment salvage or in areas that physically cannot be mechanically thinned when such burns comply with air quality regulations.

Desired Management Practices:

Agencies should adopt policies that promote and facilitate early detection and control of insect infestations through the use of biological and chemical agents, including salvage of dead and dying forest stands.

Agencies should encourage and provide for the prompt salvage and replanting of forested areas and forest losses due to fire, insect infestation, or other events.

Fuel reduction in forests is managed through silviculture, timber harvesting, and livestock grazing.

Grazing and other public land utilization should be re-implemented at previous levels after recovery from a wildfire.

The Project is consistent with the above forest management policies and desired management practices of the Utah County Resource Management Plan.

The Wasatch County RMP contains the following fire management objective and policies applicable to the Project:

Objective:

Sound fuel load management techniques should be used to minimize fire potential at the urban interface and throughout the public lands to prevent catastrophic events by applying prescribed burns, allowing grazing where appropriate, allowing appropriate timber harvesting techniques, and following wise management protocols.

Policies:

Encourage active vegetation management on public lands, by the use of mechanized vegetation treatments, timber harvesting, grazing, prescribed fire, and other treatments that will result in resilient landscapes.

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Support the efforts and findings of Utah's Catastrophic Wildfire Reduction Strategy committee (of which Wasatch County is one of the six regional committee members) and encourage measures locally to reduce fuel loads, regulate development in the wildland-urban interface and otherwise protect life, safety and property from the effects of wildfire.

Support the efforts associated with House Bill 464 to reduce the potential for resource damage associated with wildfires on public lands.

Work with federal and state agencies, the Ute Tribe, and other organizations to address the barriers and challenges associated with fire and fuels management in the interest of wildlife habitat and species conservation.

The Project is consistent with the above fire management objective and policies of the Wasatch County RMP.

The Wasatch County RMP contains the following forest management objectives and policies applicable to the Project:

Objective:

Maintain a healthy forest by reasonably following best management practices for reducing fire load, reducing forest disease, managing dead timber, and allowing reasonably limited grazing and timber harvesting.

Policies:

Forest management plans should be written and effective management techniques adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative. (Act of 2003, P.L. 108-148) Efficient and effective use of National Environmental Policy Act Documentation for limited timber harvest will be encouraged. Use of Interim Directive (ID) 1909.15 – 2003-2 will be encouraged for timber harvest projects that do not require further analysis and may be categorically excluded as outlined in categories 12, 13 & 14 of said ID.

Management strategies should protect timber and adverse impacts to other resources from the devastating effects of fire (in accordance with the National Fire Plan and the National Healthy Forest Initiative), insects, disease, wind throw, blow down, ice storms, or imminent rest of such epidemics because of conditions on adjacent land.

Sound fuel load management techniques should be used to minimize fire potential at the urban interface and prevent catastrophic events.

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Management programs must provide reasonable opportunities for citizens to harvest forest products for personal needs, economic value, and forest health.

The Project is consistent with the above forest management objective and policies of the Wasatch County Resource Management Plan.

Air Quality Benefits

According to the State RMP, “summer air quality can be impacted by levels of particulate matter generated by wildfires. Wildfire smoke is composed of a complex mixture of gases, fine particles, and water vapor that form when organic matter burns. Particulates from smoke are a mixture of solid particles - pieces of wood and other burning solids - and liquid droplets. They tend to be quite small, generally less than 2.5 micrometers in diameter, or approximately 1/70th the size of human hair.

The biggest health threat from smoke comes from fine particles. Because they lodge more deeply in the lungs, they are a greater health concern than larger particles. Fine particulates get into the eyes and respiratory system, where they can cause health problems such as burning eyes, runny nose, and illnesses such as bronchitis. They can also aggravate chronic heart and lung diseases.

Finally, the incomplete burning of wood or other organic materials produces carbon monoxide, the gas in smoke. Its levels are highest during the smoldering stages of a fire.”

The Project will reduce fuels which will reduce the risk of uncharacteristic wildfire, which will reduce wildfire-related smoke and air quality impacts. Human health benefits are anticipated.

Water Yields

These vegetation treatments should also increase water yields from the forest, which is critical during seasons of drought. Randy Julander, retired USDA Snow Survey Hydrologist and published author of numerous articles on Utah's water and watersheds, made a recent presentation to a Utah legislative caucus and stated: “forest management has a critical role in producing stream flow” (see:

<https://www.sltrib.com/news/environment/2023/01/20/are-trees-enemy-some-utah/>).

“The more straws (trees) you have sucking, the less water you have for stream flow”. Julander explained that a watershed is like a bucket with many straws sucking water out of it. The stream flow reflects what is left after all these straws have had their share. “At the turn of the century, forests were much different than they are today. The forests we have today have way too many trees. Back at the turn of the century, you might have had 10 to 20 trees per acre, today you might have 100 to 200 trees per acre”. Referring to the trees in the thinner forests at the turn of the last century, he stated, “They were more resilient and more capable of producing water.”

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Julander indicated that our present forests are not as resilient as they used to be, “Too many trees, wrong kind of trees”. Today, he said, “You have all these conifers. I see conifers as the problem. We are paying the price for the management system we have in place”. Julander also explained that open meadows are essential for retaining and capturing our snowpack. “Go from an open meadow to conifers, and you will lose 40 to 50% of snowpack into the atmosphere.”

But, we don't have to cut all the conifers to get a significant benefit. Julander continued “You don't have to treat the whole forest, you have to treat the water-producing areas. Cut circular patterns in the conifer forests, you will increase, in that open area right there, the snowpack that you lost (to evaporation off the conifer branches), that 40%, and pick up another 10 to 20% above that.”

The State supports the Project because of its potential to increase water yields from that portion of the Uinta-Wasatch-Cache National Forest.

Flood After Fire Events

According to the State RMP, in recent years, “Utah has seen a new kind of flood risk emerge that includes flooding and debris flows related to watersheds damaged by wildfire. This type of flooding is distinctly different from the floods normally seen. Post-fire-related flooding results from enhanced runoff from fire-damaged watersheds, having significant impacts on water quality. As fires burn, they destroy vegetation and often leave soils in a hydrophobic state, altering the hydrology of the watershed and producing greater peak flows.”

Debris flows have been experienced in nearby Duchesne County because of the 2018 Dollar Ridge Fire and the 2020 East Fork Fire. By implementing the Project and reducing fuels, the risk of such debris flows will be lessened.

Reducing Fuels Reduces Wildfire Costs

The State RMP notes that “the millions of dollars spent to extinguish large wildfires are widely reported and used to underscore the severity of these events. Extinguishing a large wildfire, however, accounts for only a fraction of the total costs associated with the event. Residents in the wildland-urban interface (WUI) are generally seen as the most vulnerable to fire, but a fuller accounting of the costs of fire also reveals impacts to all Utah residents and gives a better picture of the losses incurred when our lands burn.

A full accounting considers long-term and complex costs, including impacts on watersheds, ecosystems, wildlife habitat, infrastructure, businesses, individuals, and the local and state economy. Specifically, these costs include property losses (insured and uninsured), post-fire impacts (such as flooding and erosion), air and water quality damages, healthcare costs, injuries and fatalities, lost revenues, infrastructure shutdowns (such as highways,

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airports, and railroads), post-fire rehabilitation, and a host of ecosystem service costs that may extend into the distant future.

A study completed in 2017, “Wildfire in Utah, The Physical and Economic Consequences of Wildfire” as required by H.B 464, assesses the economic impacts of wildfire and provides a quantifiable analysis of the impact of wildfire on livestock and grazing, water quality, recreation and tourism, and air quality (see: <https://ag.utah.gov/home/blog/706-usu-wildfire-study.html>).

Roadless Areas

The State is encouraged that Inventoried Roadless Areas are included in the treatment areas. The State concurs that the Project falls within the exception in the Roadless Rule that allows for “cutting of generally small diameter trees to maintain or restore the characteristics of the ecosystem composition and structure and reduce the risk of uncharacteristic or undesirable wildfire.”

Wildlife

The project area is within the Division of Wildlife Resources (DWR) Wasatch Mountains mule deer management unit, which is currently below population objectives. This area provides a crucial year-long habitat for mule deer, elk, and other native wildlife species. The Strawberry Ridge Vegetation Management Project aligns with the Utah *Mule Deer Statewide Plan*. The plan encourages the DWR to work with land management agencies, conservation organizations, private landowners, and local leaders through Utah’s Watershed Restoration Initiative (WRI) to implement broad-scale vegetative treatment projects that improve mule deer habitat.

The project aligns with DWR’s *Strategic Plan* resource goals and objectives by maintaining existing wildlife habitats and increasing the quality of critical habitats and watersheds throughout the state. The DWR applauds the efforts to help maintain healthy landscapes for wildlife and access for hunters and anglers.

If you have wildlife questions, contact the DWR’s Impact Analysis Biologist in our Springville office, Josee Seamons, at jseamons@utah.gov or 385-421-1277.

Conclusions

Based on the consistency of the Project with the State RMP and the Utah and Wasatch County RMPs and DWR’s Mule Deer Statewide Plan and Strategic Plan and because of the anticipated benefits to forest health, the State offers its wholehearted support of the Strawberry Ridge Vegetation Management Project. The State supports all such active forest management efforts. Short-term impacts during treatments are outweighed by the long-term benefits. A “hands-off” or “let nature take its course” approach to forest management will not produce the desired results. The State hopes that implementation can begin soon and continue for many years until the desired conditions are reached.

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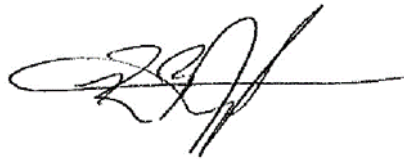
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As you assess the legal consistency of this project, you may cite that it will be executed in full compliance with the State RMP and the Utah and Wasatch counties RMPs.

The State commends the Forest Service for this excellent example of active forest management that will improve forest health, reduce the risk of uncharacteristic wildfire, enhance water yields in the watershed, and improve wildlife habitat. The draft environmental assessment is well-written and establishes that the proposed alternative is a much better course of action than the no-action alternative. The State offers brief technical comments associated with the draft environmental assessment on the following pages.

Please direct any written correspondence to the Public Lands Policy Coordinating Office at the address below or call to discuss any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Redge B. Johnson', written over a horizontal line.

Redge B. Johnson
Director

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Strawberry Ridge Vegetation Management Project Technical Comments

Page 8: Target areas would be in large regeneration pockets of conifer to create a more ~~history~~-historical vegetation ~~and~~ structure across the landscape to decrease the density of trees and to improve overall forest health.

Page 9: In addition, thinning treatments such as mastication would also reduce canopy fuels ~~in would~~ **and** reduce the ability for wildlife to spread.

Pages 17-18: The Draft EA addresses consistency with the applicable forest plan. The State requests that the Forest Service also address consistency with the applicable county resource management plans in the EA.

Page 19: Historic use starts in 1776 ~~with~~ when the Dominguez and Escalante Expedition passed through the Strawberry Valley and over the mountains in search of a new trade route from Santa Fe, New Mexico to Monterrey, California.

Page 19: Ground disturbance associated with mechanical vegetation removal of any kind can negatively impact cultural resources, both prehistoric and historic **but can also lead to new discoveries that would further the body of scientific knowledge.**

Page 20: The section regarding National Historic Preservation Act Requirements should recognize that the Ute Tribe now has a Tribal Historic Preservation Office (THPO) and the Forest Service will need to coordinate with that office.

Page 24: Water from the Strawberry Reservoir is sent down the Diamond Fork; **where** the stream habitats have been adversely impacted by historically high-water flows.

Page 25: Offsite transport of eroded soils and water sedimentation would be low in most areas because undisturbed vegetative buffers would be maintained and stormwater management BMPs would be implemented at sites disturbed by project activities. See Appendix **B.**

Page 26: After treatments are completed in an area, soils will be reclaimed on new roads that ~~was~~ **were** constructed, on improved existing non-system roads, landings, and along skid trails, if needed.

Page 26: Additionally, because pivots and turns cause the majority of soil displacement, the **(the remainder of this sentence needs to be inserted).**

Page 43: Table 4 – Wheeler’s angelica: The species has not been found in Wasatch or ~~Duchesne~~ **Utah** County where this project occurs.

Page 50: Appendix A: Resources Considered ~~By~~ **But** Dismissed