



State of Utah

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October 19, 2023

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Ryan Nehl
Forest Supervisor
Manti-La Sal National Forest
599 West Price River Drive
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RE: **Skyline Healthy Forests Restoration Act Project -- Scoping Comments**
RDCC Project No. 85659

Dear Mr. Nehl:

The state of Utah (State), through its Public Lands Policy Coordinating Office (PLPCO), appreciates the opportunity to submit scoping comments on the Manti-La Sal National Forest's Skyline Healthy Forests Restoration Act Project (the Project). As stated in the Notice of Proposed Action, the project would use a variety of vegetation treatment measures to reduce hazardous fuel loads and improve forest health and wildlife habitat across approximately 100,000 acres, over several years.

Purpose and Need

The State concurs with the purpose of the project, which is to "reduce the risk and extent of, and increase the resilience to, insect and disease infestation; and to reduce hazardous fuels" and the need for the project, which is to "act timely and reduce the risk of severe impacts from high-intensity, large scale stand-replacing fire which impact developments, both private and public, soil, water, air quality, and the safety of firefighters." The State encourages the Manti-La Sal National Forest to execute this project and similar projects elsewhere in the forest in the future.

Consistency with the State Resource Management Plan

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 in Utah 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 Manti-La Sal 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 apply 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 firefighters 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.*

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- *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, 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 the 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

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become more susceptible to intense wildfires, 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.

The State RMP contains several Forest Management policies that apply 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 replanted 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 the 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 the 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.*

Consistency with County Resource Management Plans (RMPs)

The Project is located within Carbon, Emery, Sanpete, and Sevier Counties. The Forest Service should ensure that the Project is consistent with resource management plans adopted by each county. The county RMPs may be found at: <https://utah-resource-management-planning-lpco.hub.arcgis.com/pages/county-management-plans>).

Consistency with the Carbon County Resource Management Plan

The Carbon County RMP contains the following Forest Management Objectives applicable to the Project:

- a. Maintain a continuous supply of timber and protect watersheds and water quality through minimization of soil erosion and other deleterious effects from insect damage and catastrophic fires.*
- b. It is the goal of Carbon County to have a healthy and sustainable forest ecology that contributes to Carbon County's economy and supports agricultural, recreational, and other uses.*

The Carbon County RMP contains the following forest management policies applicable to the Project:

- 1. Preserve watersheds and ensure that reclamation occurs in areas destroyed by fire. USFS-administered lands should be managed for watershed stability.*
- 2. Extinguish all fires on woodlands and forests that endanger natural wildlife habitat or human life and property.*
- 3. We support the Utah Watershed Initiative under the direction of the Utah Department of Natural Resources and the Healthy Forest Restoration Act (HFRA) of 2003. We encourage the creation of healthy forests and actively promote the use of silvicultural tools to prevent the loss of forests due to insect and disease activity.*
- 4. Manage forests for continuous yields of wood products, wildlife, fisheries, and water while protecting soil resources.*

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6. Agencies should support a broad range of reforestation and timber stand improvement tools and timber harvesting practices consistent with prudent resource protection practices.

7. 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.

8. Support the management and removal of beetle-killed timber to protect local water resources, reduce fire hazards, protect soil and vegetation, maintain the local timber economy, and protect county watersheds.

10. Support the management of non-commercial aspen stands in mixed age groups to provide a source of forage.

11. Support the use of clear-cuts as appropriate on any forest cover type with potential for impact or impacted by insects or disease.

14. Support the use of mechanical, chemical, prescribed fire, or wildland fire use to alter or perpetuate timber stands and increase herbaceous yield or cover as appropriate in areas where harvest methods are impractical, or demand does not exist.

15. Support agencies in providing woodland products on a sustainable basis, consistent with maintaining ecosystem health and other resource management objectives to meet local needs where such use does not limit the accomplishment of goals for the management of other important resources.

16. Support agencies in identifying, maintaining, and restoring forests with late-successional characteristics to a pre-fire suppression condition.

17. Support salvage harvest of wood in beetle-kill areas, when compatible with other resource objectives.

18. Support agencies in prioritizing fuel reduction treatment in high-value/high-risk areas (wildland-urban-interface, developed recreation facilities including campgrounds, FRCC III).

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19. Cooperate with the staff of the Manti LaSal National Forest to maintain healthy forest systems.

20. Support conifer reduction projects by cutting and harvesting, in preference to burning.

21. Improve fire and safety in the forest regions of the county.

22. Reduce fuel loads in forests and woodlands, giving special consideration to proper management in areas identified as being at high risk for catastrophic fire.

23. Support the State of Utah Department of Natural Resources, Division of Forestry, Fire and State Lands in its efforts to reduce areas of potential fire danger on state and county lands. The county supports the state strictly following its protocols to prevent damage to private property watersheds and rangelands.

24. The county supports the removal of timber by private operations before the expenditure of public funds whenever possible and supports the operation of private timber companies within Carbon County generally. Commercial timber harvesting should be allowed to prevent fuel load and bio-mass buildup whenever possible. State and federal agencies should allow access to private property for timber management.

25. Forests should be managed for watershed preservation in those parts of the county where forests are within the county's watersheds. Roadless or other special designations should not impede the maintenance or management of watersheds in the forests.

26. The county supports the removal of conifers where determined to be appropriate to promote aspen cover and other grasses, brush, and forbs.

27. The county supports the specific promotion and inclusion of commercial and non-commercial timber harvesting within Forest Service plans and other federal planning actions.

28. The county encourages federal and state agencies to adopt and maintain scientifically sound forest management policies based on recent data in furtherance of a policy of multiple use of public forest resources to provide sustainable and continuous yields of timber, forage, firewood, wildlife, fisheries, recreation, water, and, where appropriate, agricultural, and grazing uses.

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The Project is consistent with the above forest management objectives and policies of the Carbon County RMP.

The Carbon County RMP contains the following fire management objectives applicable to the Project:

- a. Fuels and fires are managed so that the county has no catastrophic wildfires.*
- b. All fire management planning within the county, including planning by federal partners, involves active participation from the county.*
- c. Fires are managed to protect human life, private property, sensitive species, and the local economy.*

The Carbon County RMP contains the following Fire Management Policies applicable to the Project:

- 1. Fuel reduction techniques such as conifer reduction, grazing, prescribed fire, and chemical, biological, and mechanical treatments may be acceptable, given site-specific variables.*
- 2. The county supports comprehensive fire management that helps reduce catastrophic wildfires.*
- 3. Support watershed management, including use of prescribed fire to avoid catastrophic fire, encourage aspen regeneration, remove dead standing trees, manage bark beetle impacts, and increase vegetation and diversity in plant communities.*
- 4. Agencies should avoid scheduling prescribed burns on or around major holiday weekends and whenever the region anticipates significant tourist inflows.*
- 6. Work with private landowners, federal, and state agencies in cooperation with Utah Forestry, Fire & State Lands to remove fuel load buildup by prescriptive grazing, silviculture prescriptions or mechanical means.*
- 7. Improve fire safety in forest lands and urban regions of the county.*

8. Cooperate with state and other agencies to adopt forest fire protection plans.

9. The county supports BLM and Forest Service offering funding and training opportunities at the local level for wildland and forest fire training.

10. The county supports the use of grazing livestock as an efficient and cost-effective way to reduce fuel load buildup. The county supports the granting to federal and state land managers the flexibility to increase grazing AUMs.

The Project is consistent with the above fire management objectives and policies of the Carbon County RMP.

Consistency with the Emery County Resource Management Plan

The Emery County RMP contains the following forest management policies applicable to the Project:

1. Emery 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.

2. Agencies should adopt policies that promote and facilitate local manufacturing of forest products from public lands.

3. Agencies should support a broad range of reforestation and timber stand improvement tools and timber harvesting practices consistent with prudent resource protection practices.

4. 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.

5. Agencies should adopt policies that provide for the prevention of forest fires through thinning stand densities associated with the onset of competition as well as construction and maintenance of strategically located fuel breaks and other vegetation management.

6. Such actions are critically important and necessary to change existing forest surface, ladder, and crown fuel profiles to reduce potential wildfire intensity and behavior and mitigate the consequences of large, and potentially damaging wildfires on public lands and private lands contained within and adjacent to agency-managed lands. The Achievement of a more sustainable forest condition via the implementation of such prevention actions will benefit forest-related resources, including improved watershed conditions, improved wildlife habitat, and enhanced forest health.

7. 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. Such burns should comply with air quality regulations.

8. 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.

9. The County supports and encourages partnerships between Agencies and the timber industry to implement treatments to maximize the environmental benefits of forest ecosystem health, diversity, and sustainability, and to maximize social and economic benefits of industry and community infrastructure, increased employment, and improved tax base.

10. The County encourages Agencies to actively manage the watersheds in forested areas by reducing the threat of wildfire; thereby increasing water supply security and quality, providing deeper, more persistent snowpacks, longer runoff duration, and increased groundwater storage.

12. Emery County supports the Utah Forest Practices Act, IJCA 65A-8e, et seq., and its stated purposes:

Ensure the protection of forest, soil, and water resources by:

- Preserving water quality and soil stability,*
- Preventing fire hazard and insect infestation,*
- Minimizing waste of timber resources,*
- Protecting forest regeneration and production.*

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

The Emery County RMP contains the following fire management policies applicable to the Project:

- 1. The condition of some public lands in the County is dangerously overgrown with fire fuels thereby creating a public nuisance and potential hazard. Agencies must manage these lands in a manner that reduces the fire threat and guards against fire's serious air quality impacts.*
- 2. Agencies should work diligently to reduce the threat of wildfire on public lands to protect the County's water resources.*
- 3. Reducing forest fuels is a cost-effective fire prevention and protection practice that can lessen the necessity to battle catastrophic wildfires. The County supports active forest thinning and increased timber production that preserves wildlife habitat, minimizes erosion, and does not irreparably harm watersheds and streams.*
- 4. Federal and State Agencies are encouraged to participate in developing, implementing, and updating fire protection plans and engage in public outreach efforts by providing information and education about fire risk.*
- 5. Agencies should provide information to the County on their policies and practices related to fire use and fuels management, including but not limited to, fire use designation criteria, favorable and unfavorable prescribed burning parameters, fuel model inputs, fire personnel staffing levels, and public road closures and re-openings.*
- 6. Agencies should coordinate planning, scheduling, implementation, and dissemination of public information concerning prescribed burns with Emery County.*
- 7. Agencies should avoid scheduling prescribed burns on or around major holiday weekends and whenever the region anticipates significant tourist inflows.*

The Project is consistent with the above fire management policies of the Emery County RMP.

Consistency with the Sanpete County Resource Management Plan

The Sanpete County RMP contains the following forest management objectives applicable to the Project:

- a. Healthy forests are managed for multiple uses, most importantly water quality and watershed protection.*
- c. Forests and woodlands are managed for healthy conditions that contribute to healthy habitats for animal and plant species, proper watershed functioning conditions, and riparian restoration and enhancement.*

The Sanpete County RMP contains the following forest management policies applicable to the Project:

- 1. 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.*
- 2. The county supports the management of beetle-killed timber to protect local water resources, reduce fire hazards, and protect soil and vegetation.*
- 3. The county supports the management of bark beetle impacts on forests and rangelands.*

The Sanpete County RMP contains the following desired forest management practices applicable to the Project:

- 1. Sanpete 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.*

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2. Support the removal of conifers as determined appropriate and manage land to promote the establishment of aspen cover and attendant grass, brush, and forbs. The Stand Density Index (SDI) of spruce-fir/conifer communities should not exceed 359.

3. Encourage the removal of drought and beetle-killed timber and the appropriate re-seeding as soon as practicable after the death of conifer populations to maintain the local timber harvest and production economy and to maintain healthy forests, while protecting our watersheds from catastrophic fires.

4. Encourage timber harvesting to prevent fuel load and biomass buildup.

5. 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.

6. 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.

7. Support the management of non-commercial aspen stands in mixed age groups to provide a source of forage.

9. Support the management of timberlands not suitable for commercial harvest to maintain forest cover species, but the emphasis should be on the production of other forest resources and uses.

10. Support the use of clear-cuts as appropriate on any forest cover type with potential for impact or impact by insects or disease.

12. Support the use of commercial tree sales, timber products, and thinning for stocking control where the opportunity exists.

14. Support planting new trees to provide desired cover when natural reproduction is insufficient.

15. Support the use of mechanical, chemical, prescribed fire, or wildland fire use to alter or perpetuate timber stands and increase herbaceous yield or cover as appropriate in areas where harvest methods are impractical, or demand does not exist.

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16. Support agencies in providing for harvest of forest products when the activity would improve water production and/or does not adversely affect water quality.

17. Encourage, where feasible, the harvest of forest products in areas of proposed or existing vegetation treatments to lessen the need for additional treatment or land disturbance, and in areas that need restoration for ecological benefits.

18. Support salvage harvest of wood in beetle-kill areas, when compatible with other resource objectives.

The Project is consistent with the above forest management objectives and policies and the desired forest management practices outlined in the Sanpete County RMP.

The Sanpete County RMP contains the following fire management objectives applicable to the Project:

a. Fires are managed to protect human life, private property, water quality, sensitive habitat or species, and the local economy.

b. All fire management planning within the county, including planning by federal partners, involves active participation from Sanpete County.

c. Fuels and fires are managed so that the county has no catastrophic wildfires.

The Sanpete County RMP contains the following fire management policies applicable to the Project:

1. The county will work together with partners and other affected groups and individuals to reduce risks to communities and restore ecosystems.

2. The county will assist in fighting fires through cooperative efforts between state and/or federal firefighting and forestry agencies.

3. The county will support projects that alleviate the possibility of catastrophic wildfires.

4. Sanpete County will support pre-planned prescribed fires resulting from planned or unplanned ignitions to accomplish resource management objectives, such as reducing fuel load build-up, range, or wildlife habitat improvement, etc.

5. Sanpete County will support watershed management and protection including using prescribed fire to avoid catastrophic fire, encourage aspen regeneration, remove dead-standing trees, manage bark beetle impacts, and increase vegetation and diversity in plant communities.

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

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

8. Protection of human life should be the primary fire management priority. Establishing a priority among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources is based on human health and safety, the values to be protected, and the costs of protection. When firefighters and other personnel have been committed to an incident, these human resources become the highest values to be protected.

The Sanpete County RMP contains the following desired fire management practices applicable to the Project:

1. Implementation of fuels management actions should be prioritized using the following criteria:

a. Wildland-urban-interface areas.

b. Areas with fuel loading that could potentially result in the loss of ecosystem components following wildland fire.

c. Resource management goals and objectives.

2. Agencies should coordinate planning, scheduling, implementation, and dissemination of public information concerning prescribed burns with Sanpete County.

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

4. Hazardous fuel reduction treatments should be used to restore ecosystems; protect human, natural, and cultural resources; and reduce the threat of wildfire to communities.

5. Fuel reduction techniques such as conifer reduction, grazing, prescribed fire, chemical, biological, and mechanical treatments may be acceptable, given site-specific variables.

6. Agencies should avoid scheduling prescribed burns on or around major holiday weekends and whenever the region anticipates significant tourist inflows.

8. Wildland fire use may be authorized, except when the following resources and values may be negatively impacted:

a. Wildland-Urban Interface (WUI) areas.

b. Areas that are known to be highly susceptible to post-fire cheatgrass or invasive weed invasion.

c. Important terrestrial and aquatic habitats.

d. Non-fire-adapted vegetation communities.

e. Sensitive cultural resources.

f. Areas of soil with high or very high erosion hazard.

g. Class I air attainment areas and PM-10 non-attainment areas.

h. Administrative sites.

i. Developed recreation sites.

j. Communication sites.

k. Oil, gas, and mining facilities.

l. Above-ground utility corridors. m. High-use travel corridors, such as interstates, railroads, and/or highways.

The Project is consistent with the above fire management objectives, policies, and desired management practices outlined in the Sanpete County RMP.

Consistency with the Sevier County Resource Management Plan

The Sevier County RMP contains the following forest management policies applicable to the Project:

- 1. Support the removal of conifers and manage land to promote the establishment of aspen cover and attendant grass, brush, and forbs.*
- 2. Encourage the removal of drought and beetle-killed timber, and appropriate reseedling as soon as practicable after the death of conifer populations to maintain the local timber harvest and production economy and to maintain healthy forests, while protecting our watersheds from catastrophic fires.*
- 3. Encourage timber harvesting to prevent fuel load and biomass buildup.*
- 4. Sevier 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.*
- 5. 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.*
- 6. Support the management of beetle-killed timber to protect local water resources, reduce fire hazards, and protect soil and vegetation.*
- 7. Support salvage harvest of wood in beetle-kill areas, when compatible with other resource objectives.*
- 10. Support meeting as much of the demand for wood fiber and forest products as possible, consistent with multiple-use objectives.*

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12. Support managing forest cover types to perpetuate tree cover and provide healthy stands, high water quality, and wildlife and fish habitat.

13. Support agencies in providing for harvest of forest products when the activity would improve water production and does not adversely affect water quality.

14. Support the management of forests and woodlands for healthy conditions that contribute to healthy habitat for animal and plant species, proper watershed functioning conditions, and riparian restoration and enhancement.

16. Support agencies in prioritizing fuel reduction treatment in high-value/high-risk areas (e.g., wildland-urban interface, developed recreation facilities including campgrounds).

The Sevier County RMP contains the following desired forest management practices applicable to the Project:

1. Encourage the commercial and non-commercial harvesting of forests and woodlands, to the maximum extent possible, through federal agencies' plans and policies.

2. 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.

4. Agencies should support a broad range of reforestation and timber stand improvement tools and timber harvesting practices consistent with prudent resource protection practices.

The Project is consistent with the above forest management policies and the desired forest management practices outlined in the Sevier County RMP.

The Sevier County RMP contains the following fire management objectives applicable to the Project:

a. All fire management planning within the county, including planning by federal partners, involves active participation from the county.

b. Fuels and fires are managed so that the county has no catastrophic wildfires.

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The Sevier County RMP contains the following fire management policies applicable to the Project:

3. The county will work together with partners and other affected groups and individuals to reduce risks to communities and to restore ecosystems.

4. Assist in fighting fires through a cooperative effort between the federal agencies and the county.

5. Support projects that alleviate the possibilities of catastrophic wildfire.

6. Work with the State of Utah Division of Forestry, Fire and State Lands to implement the Wildland Fire Plan and to reduce wildfire hazard in the wildland-urban interface (WUI).

7. Require that fire and burn management policies be in place on all forests and woodlands in the county.

8. Support watershed management including using prescribed fire to avoid catastrophic fire, encourage aspen regeneration, remove dead standing trees, manage bark beetle impacts, and increase vegetation and diversity in plant communities.

9. Implementation of fuels management actions should be prioritized using the following criteria:

- Wildland-urban interface (WUI) areas.*
- Areas with fuel loading that could potentially result in the loss of ecosystem components following wildland fire.*

10. Encourage agencies to locate fuel breaks along existing roads, rights-of-way, and other suitable topographic or natural features (e.g., areas devoid of vegetation, and rock outcrops) when possible.

11. Fuel reduction techniques such as conifer reduction, grazing, prescribed fire, chemical, biological, and mechanical treatments may be acceptable, given site-specific variables.

12. Support the prioritization of using native seeds for fuels management treatment based on availability, adaptation (site potential), and probability of success. Where the probability of success for native seeds is low, desirable non-native seeds may be used to trend toward restoring the fire regime. When reseeding, use fire-resistant native and desirable non-native species, as appropriate, to provide fire breaks.

13. Hazardous fuels reduction treatments should be used to restore ecosystems, protect human, natural, and cultural resources, and reduce the threat of wildfire to communities.

14. Support applying seasonal restrictions, as needed, for implementing fuels management treatments according to the type of seasonal habitats present.

15. Support the reduction of fuel loading conditions in forests and woodlands.

16. Protection of human life should be the primary fire management priority. Establishing a priority among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources is based on human health and safety, the values to be protected, and the costs of protection. When firefighters and other personnel have been committed to an incident, these human resources become the highest values to be protected.

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

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

The Sevier County RMP contains the following desired fire management practices applicable to the Project:

1. Agencies should coordinate planning, scheduling, implementation, and dissemination of public information concerning prescribed burns with Sevier County.

2. Agencies should avoid scheduling prescribed burns on or around major holiday weekends and whenever the region anticipates significant tourist inflows.

3. 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.

4. Where appropriate, agencies or other involved parties should replant cottonwood and willow after wildland fire or other disturbance in riparian areas.

5. Upon project completion, fuel projects should be managed and monitored to ensure long-term success, including the persistence of seeded species and/or other treatment components, such as implementing maintenance actions. Control invasive vegetation post-treatment.

6. As soon as possible after a fire, noxious and invasive weed management, watershed protection and restoration, and flood management issues should be addressed to mitigate negative impacts.

The Project is consistent with the above fire management objectives, policies, and desired fire management practices outlined in the Sevier County RMP.

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 a 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".

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 Manti-La Sal 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 the project area as a result of the 2012 Seeley Fire. By implementing the project and reducing fuel, the risk of such debris flows in the future 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 to 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, 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>).

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Roadless Areas

The State is encouraged that Inventoried Roadless Areas (IRAs) are included in the treatment areas. The State concurs that the Project falls within the exception in the Roadless Rule that allows for the “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.” The State does not support an alternative that would exclude IRAs from forest health treatments as that alternative would not meet the purpose of and need for the project and would increase the risk of uncharacteristic wildfire in the IRAs.

Conclusions

Based on the consistency of the project with the State Resource Management Plan and the Carbon, Emery, Sanpete, and Sevier County Resource Management Plans and because of the anticipated benefits to forest health, the States offers our wholehearted support of the Skyline Healthy Forests Restoration Act 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.

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. We look forward to reviewing the Environmental Assessment.

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', is written over a horizontal line.

Redge B. Johnson
Director