

Strawberry Ridge Vegetation Management Plan Draft EA—Project #64510 public comment submission

It is a hard job to manage multi-use public lands, balancing competing interests and pressures on our life-sustaining national forests. A course correction is needed from the consequences of past management decisions like fire suppression that prioritized humans' short term gains over long term forest health. I appreciate the work that went into this detailed proposal to put in speed bumps and reduce risk of uncharacteristically hot fires, but I hope constructing new access for recreation and irresponsible logging is not allowed under the guise of fuels reduction. Providing easier access for recreationalists as a consequence will cause more conflicts with wildlife and habitat protection, and make carrying out the Forest Service's mission even more difficult in the future.

1. Scale

The scale of this project is huge, with a stated time frame of 10 years, but that's likely optimistic. The large majority of megaprojects go over time and over budget. I would recommend prioritizing the areas in order of importance and not being set on getting everything done as fast as possible, as conditions may change, lessons will be learned, and ongoing research will provide new input. Roadless areas should be a low priority or left alone.

2. Alternative Options

Why are only 2 alternatives considered? There is a lot of middle ground between doing nothing and the proposed plan. Doing a smaller area and monitoring the results could bring to light factors not previously considered, and the plan could be tweaked or downsized as appropriate.

3. Comment Period

Thirty days is a short time frame to get out notices for public comments. Thank you for allowing the one week grace period.

4. Wide Riparian Buffers and Water Quality

You're likely familiar with the "[Smokey the Beaver](#)"¹ concept and how these wonderful creatures do [fire suppression work naturally](#)² (a must-see 45 sec video that really demonstrates their helpful handiwork!) Nature's fire managers and ecosystem engineers do great work in the stream corridors. They will fell trees in the streams and do exactly what is proposed in the plan for free.

I'm very concerned the machine-intensive removal process will impact these keystone species, along with other wildlife living in riparian areas. Water quality would also be affected by runoff and erosion from the equipment's paths and temporary roads and stream crossings. Buffer zones should be a minimum of 50 to 300 ft, or the 100 year floodplain.³ (Pg. 27 mentions minimum 50 ft buffers—this rule should be stressed to

operators with repeated reminders by supervisors, as it's easy to forget this once work starts.)

5. Oversight of Commercial Timber Harvesters

What guardrails are placed on the commercial timber harvesters, and how are those enforced? Is the Forest Service fairly compensated for the trees they are removing, including long term management costs that will definitely go up with increased risk of invasive species being introduced into disturbed surfaces, and brought in on the tires of heavy equipment that has worked in other sites? I sure hope this isn't proposing to use the controversial ["roller felling" methods](#)⁴. Methods should mimic natural processes, using hand felling and burn piles as much as possible, especially on steeper slopes and protected areas, and avoid dozers and heavy equipment whenever feasible.

6. Noise Pollution and its Harmful Effects on Wildlife

Our national forests are a sanctuary for wildlife and humans. Noise is a human pollutant and has huge negative effects on most forms of wildlife who have much more sensitive hearing than we do. Human conversation occurs at about 60 decibels, and sounds like breathing or the rustle of leaves is 10 db. Predators can detect -20 db, detecting insects' and birds' footsteps. *"Ambient road noise drowns out songbirds' alarm calls and prevents owls from detecting rodents. A mere 3 decibel increase in background noise halves the "listening area," the space in which an animal can pick up a signal. By disturbing animals, noise also disrupts the ecological processes they catalyze, among them seed dispersal, pollination and pest control."*⁵ There is an insightful [study where a recording of the road noise from Going-to-the-Sun Road in Glacier NP was placed in an Idaho forest](#).⁶ On days the Phantom Road recordings played, bird counts plummeted, and the birds that didn't leave the area were skinnier and stressed.

7. Road Construction

The construction of 73 miles of roads, even "temporary roads," is very destructive and will be an open wound, expensive to restore, and a path for invasives. *"Temporary roads are temporary in nature and for short-term use and would be reclaimed by timber purchaser; if temporary roads are needed for post-sale treatments, road closure activities and restoration would be accomplished by the Forest Service once post-sale treatments are complete."* (Pg. 12) What percentage of temporary roads are expected to need post-sale treatments? This sounds like an expensive option. If the commercial timber purchasers benefit from the harvest of trees, they should bear the burden of removing and revegetating the constructed roads to acceptable standards. Any roads constructed in roadless areas should be completely removed and restored to pre-treatment conditions.

8. Tribal Consultation and Cultural Site Protection

The whole Strawberry Valley was originally part of the Reservation granted to tribes in 1861 by Abraham Lincoln. *"However, when valuable mining land was found on the*

Utah and Ouray Reservation, the government pulled that strip of land out of the reservation. Gradually over the 1880s and into the 20th century, the reservation got smaller as the government carved out land for mining, for a reservoir, and for a national forest. In 1905 the government opened the reservation to white homesteaders, giving away the land that it had previously given the Utes. Because of many broken promises, the reservation is now one quarter of its original size.”⁷

Pg. 14 mentions the Northwestern Band of Shoshone and Ute Indian Tribes were consulted. Were they able to engage in a meaningful way in the development of these plans, and offered to help with implementation if interested? The [Timpanogos](#)⁸ may also have some traditional knowledge to provide insightful perspectives and be able to utilize wood, traditional medicinal plants and foods if given ample notice before the burns are scheduled. If Tribes are willing, co-stewardship and co-management options should be considered. “Promoting shared stewardship” is a priority for the USFS and [US policy](#).⁹ and is already [modeled by hundreds of other public lands](#)¹⁰ throughout the country.

Regarding cultural sites, pg. 20 states: “Treatment around known eligible sites will be coordinated with the Forest Archaeologist and SHPO/Tribes.” How much time will the interested Tribes be given notice of the burn schedule, such that they have ample time to look for culturally significant sites and/or salvage any harvestable plants before the heavy equipment and fuels reduction work begins?

9. Boreal Toad

On pg 57, the plan calls to avoid the breeding season of Boreal Toads: “*Minimize disturbance of riparian areas in known occupied boreal toad habitat during the active breeding season (4-5 weeks following snowmelt).*” This window may prevent negative impacts while the toads are mating, but does not consider the time to metamorphosis in wild populations, the [2 1/3 to 3 month vulnerable tadpole stage](#)¹¹. Known Boreal Toad habitat should be designated an EEZ (Equipment Exclusion Zone) with no mechanized stream corridor treatments.

10. Hub Trees and Mycorrhizal Networks

Will the plan take into account [research done by Suzanne Simard](#) and others to protect important Mother Trees and the mycorrhizal networks they use to communicate and support each other?

I see this plan benefits grazing permit holders, recreation users utilizing roads (pg 32), businesses associated with recreation (pg 32), realtors and landowners who have unwisely built large, expensive homes in WUI (relying on public funds to protect private property,) and commercial timber harvesters.

The aspen could be helped by removing grazing and small controlled burns in selected areas. Goshawks (pg 46,) Boreal Toads (pg 22-23), Beavers, Fish and Amphibians (sedimentation from roads, stream crossings, higher water temps), predators searching for prey, prey avoiding

predators (noise pollution from temporary and long-term disturbances brought in by roads), wildlife from apex predators down to fungi, and future generations seeking wilderness experiences are not able to comment themselves. The loud voices with financial and self serving interests should not overpower the needs of the creatures whose habitat we are entrusted with.

I would like to thank District Ranger Daniel Jauregui for taking the time to address some of my initial concerns and encouraging submission of written comments before the October 9th deadline (coincidentally, Indigenous People's Day!)

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Minor typos:

Pg. 26: unfinished sentence: *"Additionally, because pivots and turns cause the majority of soil displacement, the..."*

Pg. 35: extra word "be" in last paragraph

Pg. 41: June Sucker has been reclassified as Threatened in 2021, no longer listed as Endangered.

Pg. 50: Typo "by" in title "considered **but** dismissed"

References:

1. [Smokey the Beaver](#) Webinar for the US Forest Service by Emily Fairfax
2. [Beavers and Wildfires](#) Stop Motion Video by Emily Fairfax
3. [Creating a Successful Riparian Buffer by Dan River Basin Association](#) pg.5
4. [Roller Felling, Utah's controversial method to restore Aspen](#), by Brian Maffly, Salt Lake Tribune, March 21, 2023
5. [The Blab of the Pave, Noise pollution disrupts animals' lives everywhere, even in national parks](#), by Ben Goldfarb, High Country News, Vol.55, No.9, September 2023
6. [Phantom Road Experiment Shows How Noise Harms Birds](#) by Ed Yong, The Atlantic, August 31, 2015
7. <https://ilovehistory.utah.gov/1861-and-beyond-uintah-reservation/>
8. [Timpanogos Nation website](#)
9. [DOI-First Annual Report on Co-Stewardship](#), Implementing Joint Secretarial Order 3403, Fulfilling the Trust Responsibility to Tribes, November 2022
10. <https://www.hcn.org/articles/public-lands-the-state-of-tribal-co-management-of-public-lands>
11. [Highly variable rates of survival to metamorphosis in wild boreal toads \(Anaxyrus boreas boreas\)](#) by John G. Crockett, Larissa L. Bailey (Colorado State University), and Erin Muths (USGS), pg 10 and Table 5

12. [The Mother Tree Project](#)