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Comments: 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. These declines are attributable to the spread of insects and diseases, differing fire regimes, and conifer invasion. Aspen stands support a substantial number of plant and animal species and are vital for the diversity of Utah's environment and ecosystems.

Research shows that active management improves the health and reproduction of aspen stands. Stand thinning at mid-age resulted in greater basal area and increased reproductive stems. In addition to thinning, bulldozing aspen stands has been shown to increase the root suckering more than other types of management. Prescribed fire is an additional tool that helps regenerate aspen stands. 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.

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.