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Organization: State of Utah, Public Lands Policy Coordinating Office
Title: RDCC Coordinator
Comments: The State of Utah ("State"), through the Public Lands Policy Coordinating Office (PLPCO), has reviewed the Draft Environmental Assessment ("EA"). The State supports the project. The State supports Alternative B to treat 34,056 acres in the Upper Weber watershed over the next decade in Summit County. This project aligns with the goals, objectives, and policies found in the State Resource Management Plan and the Summit County Resource Management Plan. In collaboration with the Utah Division of Wildlife Resources, the State submits the following comments for your consideration.

The State recognizes that the project is located in a Wildfire Crisis area and adjacent to the Wild Urban Interface (WUI) in the upper Weber. Any efforts to reduce potential wildfire effects, restore forest stand structural and species diversity, and increase forest resistance and resilience to insects and disease should be implemented. The cabins and yurts in the upper Weber are hidden in dense brush and trees. The State is supportive of the U.S. Forest Service (USFS) working with private landowners and other partners to further reduce fuel loads in the WUI beyond the scope of this proposed project in the upper Weber.

The State is supportive of the purpose and need for the project and encourages USFS to expand vegetation treatment work in the project area and throughout the forest. The State does not have concerns with the site-specific amendment as described in Appendix A. This Forest Plan Amendment would allow for fuels and vegetation treatments within only the proposed project area.

The DWR 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 34,056 acres.

The Uinta-Wasatch-Cache National Forest ("UWCNF") Upper Weber Watershed Restoration Project area encompasses crucial habitats for wildlife, including elk, mule deer, moose, black bear, Bonneville cutthroat trout, beaver, boreal toad, mountain lion, dusky and ruffed grouse, and 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, one of the most targeted aspects of this project, also enhances upland bird habitat. The results of vegetation treatments, including regeneration of understory vegetation, 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 Upper Weber Watershed Restoration Project align with this Strategic Plan.

If you have wildlife questions, please contact Melissa Early, the DWR's Impact Analysis Biologist in our Northern Regional office, at mearly@utah.gov or 801-386-4885.

The State recognizes that fisheries and amphibians may be potentially impacted by the project and encourages the USFS to take necessary steps to avoid, minimize, or mitigate those impacts. The State also recognizes that these potential short-term impacts could allow for significant long-term benefits for all species in the project area. The State is supportive of implementing Riparian Habitat Conservation Areas with reasonable buffers as well as Equipment Exclusion Zones to limit disturbance in riparian areas where equipment may not be the best option.

The State recognizes that the two livestock allotments are in satisfactory condition and that the proposed project would enhance grazing distribution, improve management, and decrease utilization in some high-impact areas on each of the allotments. Management and livestock stocking rates and seasons of use would remain the same and there are no changes to the term grazing permits under the proposed action. The State has been working through the Grazing Improvement Program to disperse livestock and move the livestock away from high-impact areas by providing water sources that are up on the ridgelines away from the riparian areas. In Summit County, most of these projects have occurred on Chalk Creek.

The area around Smith and Morehouse Reservoir and the two campgrounds on either end of the lake are popular for recreational purposes year-round - particularly between May and October. This is the primary public access to public lands in the upper Weber. The State recognizes that temporary short closures for this project will protect these recreational areas from long-term closures in the event of an uncharacteristic wildfire. The State requests that temporary limitations and closures for public safety be designed in a way that allows for the most public access possible, that closures or limited-use access be minimally restricted, and that the public be notified of these limitations and closures well before they occur. The State requests that signage be placed along the roadside at the mouth of the canyon near Oakley to inform the public before they drive several miles up to the reservoir. If possible, these limitations and closures should also be planned outside of the busy season (May through October).

The State is very supportive of silviculture prescriptions that remove conifer encroachment and promote the expansion and health of aspen stands. Having a mosaic of tree stands and age classes, including mature and old-growth stands, allows for a more resilient forest ecosystem.

In conclusion, the State supports the USFS in selecting Alternative B and engaging in proactive landscape-scale watershed restoration in the upper Weber. Selecting Alternative A would be detrimental to the forest, wildlife, watershed, and all persons associated with or who enjoy visiting the proposed project area.
The State appreciates the opportunity to provide comments. Please contact me if you have any questions.