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Comments: The state of Utah (State), through its Public Lands Policy Coordinating Office (PLPCO), appreciates the opportunity to submit scoping comments on the Ashley National Forest's Burnt Beaver Forest Restoration Project (the Project). As stated in the scoping and comment newsletter dated November 2024, the Project would use a variety of vegetation treatment measures to reduce hazardous fuel loads and improve forest health and wildlife habitat across a 3,458-acre landscape in Daggett and Summit counties, with implementation to begin as soon as the Summer of 2025. The Project appears similar to forest treatments recently conducted on the abutting Uinta-Wasatch-Cache National Forest. A portion of the Project falls within a Shared Stewardship priority landscape area, arrived at through coordination with a variety of agencies in the region.

Purpose and Need

The State concurs with the purpose and need for the Project, which is to "improve forest health, reduce hazardous fuels, improve public safety, and capture the economic value of cut trees in treatment stands." The State encourages the Forest Service to implement this Project and similar projects elsewhere on 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 goals, objectives, and 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 Forest Service be consistent with these state and local plans, goals, objectives and policies to the greatest degree possible.

The State RMP contains several Fire Management policies that apply to the Project:

*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, 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 finds that the Project is consistent with the above Fire Management policies.

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 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 applicable to the Project:

*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.

The State finds that the Project is consistent with the above forest management policies.

Consistency with County Resource Management Plans (RMPs)

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

The Daggett County RMP contains the following fire management goals, objectives, and policies applicable to the Project:

Goals

Firefighting and management are, and always have been, critical to protecting the health, safety, and welfare of the County and its residents. It is a goal of Daggett County to provide and maintain proper fire prevention, management, and mitigation.

Objectives

1. Manage forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by society, including ecosystem and community health and resilience. In most cases, fires reach catastrophic levels largely as the result of human intervention, or lack thereof, on the land. Catastrophic wildfires are more intense than natural fires and kill practically all vegetation within the fire perimeter. They can also sterilize soils, resulting in difficult regeneration and depositions of ash and sediments in waterways. Catastrophic wildfires also have a higher probability of threatening private property and public infrastructure, and they can adversely affect public health and safety.

2. Seek opportunities to use and harvest forest products that have been affected by wildfire or pests.

Policies

1. When revising or updating a forest plan, the Forest Service should engage with Daggett County in developing alternative management strategies and management policies.
2. Removal of forest products shall be viewed as achievable and sustainable provided that appropriate science and technology are used.
3. Encourage legislation and management that allows for timber removal on a timely basis to increase economic returns as well as to control wildfires.
4. Daggett County would like to pursue an agreement between Daggett County and federal agencies regarding the county's right to be the first responder to wildland fire events within Daggett County.

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

The Daggett County RMP contains the following forest management and timber goals, objectives, and policies applicable to the Project:

Goals

It is Daggett County's goal to use and manage landscapes and resources, including forests, for multiple uses and forest health.

Objectives

1. Use active and adaptive forest management to improve forest health in Daggett County and support multiple use and sustained yield with emphasis on employment, forest products, open space, wildlife habitat, forage, recreation, and other social and economic benefits.
2. Manage Daggett County's forest resources to reduce the risk of catastrophic fires, which cause unacceptable harm to resources and assets valued by Daggett County, including ecosystem and community health and resilience.
3. Encourage and support the expansion of the Daggett County forest-product market at sustainable harvest levels.
4. Develop new markets for timber and forestry products that are available for harvest within Daggett County (e.g., use timber products for bracing in nearby coal mines or the biofuels industry).
5. When sustainable and based on scientific knowledge and local data, increase Daggett County to historic levels (allotments, animal unit months [AUMs], or seasonal use) to reduce fuel loads, support local economies, and support rural lifestyles for county residents.
6. Manage Daggett County's forest watersheds for optimal yield without compromising other resources.
7. Seek opportunities in Daggett County to use and harvest forest products that have been affected by wildfire or pests (e.g., pine beetles).

8. Reduce the time required for NEPA processes associated with timber harvests within Daggett County so that economic benefits can be maximized.

Policies

1. Manage all Daggett County forested lands for sustained yield, multiple use, and forest health.
2. Manage fire, timber harvesting, and treatment programs to prevent waste of forest products.
3. Provide fuel load management and fire control in Daggett County to prevent catastrophic events and reduce fire potential at the urban and industrial interface.
4. Design Daggett County management and harvest programs to provide opportunities for local citizens and small businesses.
5. Protect Daggett County timber resources and promote the continuation of a sustainable wood products industry.
6. Promote sale sizes that provide opportunities in Daggett County for a wide spectrum of producers and allow for local entrepreneurship.
7. Promote commercial firewood harvesting to help in fuel-load management and fire control. Encourage the Forest Service to open appropriate areas for commercial timber harvest.
8. Participate in the planning for and revision of Forest Service management plans and BLM resource management plans affecting forest management. When revising or updating a forest plan, the Forest Service should engage with Daggett County in developing alternative management strategies and management policies.
9. Encourage the Forest Service to find commercial uses for timber and forest products within Daggett County that have been affected by wildfire or pests.
10. Collect and provide data to the Forest Service regarding appropriate forest management methodologies in Daggett County. Data may include published scientific literature, local case studies, inventories, or other pertinent information.
11. additionally, areas for timber and non-timber product harvest and wildlife habitats shall be identified for the forest. Long- and short-term productive capacities and targets shall be established.
12. Removal of forest products shall be viewed as achievable and sustainable, provided that appropriate science and technology are used.
13. Require management programs to provide opportunities for citizens to harvest forest products for personal needs, economic value, and forest health in Daggett County. Sound economic approaches, considering both long- and short-term goals, shall be used when considering the harvesting of both wood and non-wood products, and appropriate social values shall be considered.
14. Require forest management plans to be written in which effective management techniques are adopted to promote a stable forest economy and enhanced forest health in Daggett County, in accordance with the National Healthy Forest Initiative.

15. Grazing on national forest lands within Daggett County should be tied to historic levels and healthy forest conditions. AUMs should be maintained; vacant allotments should be actively restocked.

The Project is consistent with the above forest management and timber goals, objectives, and policies of the Daggett County Resource Management Plan.

The Summit County RMP contains the following fire management goals, objectives, and strategies applicable to the Project:

Wildfire Management (WM)

WM Goal 1: Continued prevention of catastrophic wildfires in Summit County.

WM Objective 1.1: Reduce fuel loads resulting from timber disease and bark beetle kill.

WM Strategy 1.1.1: Coordinate with the Forest Service to allow temporary road access in roadless areas to retrieve/ harvest beetle kill timber.

WM Strategy 1.1.2: Work with the Forest Service to determine potential opportunities to streamline the timber harvest permit process for special circumstances related to catastrophic wildfire protection and fuel load reduction.

WM Strategy 1.1.3: Identify restoration opportunities following timber harvests.

WM Strategy 1.1.4: Consider including targeted grazing strategies as a policy to reduce fuel loads and reduce the risk of wildfires where appropriate throughout the County.

WM Objective 1.2: Summit County will continue to work cooperatively with the Utah Division of Forestry, Fire, and State Lands and the Forest Service to implement the Comprehensive Statewide Wildland Fire Prevention, Preparedness, and Suppression policy known as SB-56.

The Project is consistent with the above fire management goals, objectives, and strategies of the Summit County RMP.

The Summit County RMP contains the following forest management goals, objectives, and strategies applicable to the Project:

Forest Management (FM)

FM Goal 1: Provide for healthy and sustainable ecosystems while including benefits for people.

FM Objective 1.1: Support and enhance the diversity and quality of recreation experiences within acceptable limits of change to ecosystem stability and condition.

FM Strategy 1.1.1: Coordinate with the Forest Service to implement trail and facilities maintenance strategies for the Recreation and Tourism resources.

FM Objective 1.2: Support the Forest Service in a cooperating capacity to reduce fuels and manage tree stands to increase overall forest health.

Strategy 1.2.1: Defer to the Revised Forest Plan for the Wasatch-Cache National Forest for continued coordination and direction.

The Project is consistent with the above forest management goals, objectives, and strategies of the Summit 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 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, "[t]oo many trees, wrong kind of trees". Today, he said, "[y]ou 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 "[y]ou 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 Ashley

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 as a result 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 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 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, 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."

Conclusion

Based on the consistency of the project with the State Resource Management Plan and the Daggett and Summit County Resource Management Plans and because of the anticipated benefits to forest health, the State offers our wholehearted support of the Burnt Beaver Forest Restoration 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.

As you assess the legal consistency of this project, you may cite that it will be executed in full compliance with the State Resource Management Plan and Resource Management Plans of Daggett County and Summit County.

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.

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