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Comments: The state of Utah (State), through its Public Lands Policy Coordinating Office (PLPCO), appreciates the opportunity to submit objections 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.

The State concurs with the overall 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 Service to execute this Project and similar projects elsewhere in the forest in the future.

General Acceptance and Reservation of Rights

Upon review of the Environmental Assessment, Finding of No Significant Impact, and Draft Decision Notice prepared and released on January 8, 2025, the State accepts the Draft Decision excepting the objections stated herein. The State does however reserve the right to both add additional comments and object if the decision were to change in the future based upon other objections and decisions by the Forest Service. The State also reserves the right to seek redress if the implementation of the plan deviates from the Environmental Assessment and Draft Decision prepared and released on January 8, 2025, up to and including seeking relief in Court.

Objections

The State objects to the absence of a requirement to collaborate, cooperate, and communicate with the counties and local governments about burning schedules, temporary road building, road closures, and final clean-up.

During the scoping phase of the Project, the State submitted scoping comments and referred to the State and County Resource Management Plans (RMPs). They are included here for reference:

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.

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

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

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.

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

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

The County RMP's anticipate active participation in the planning of prescribed burns as well as the concern for clean air and particulates around busy holiday weekends. This plan has the potential to affect recreation during the carrying-out phase and into the future. If recreationists have a positive experience, they will likely return more often to recreate in this area. If recreationists have a negative experience based upon road closures, or prescribed burns and the effects from smoke and particulate matter they will not return, harming the counties' tourism and recreation economy.

The State asks the Forest Service to coordinate with the counties and local governments when carrying out this plan and that each county has a designated contact person with whom the Forest Service can easily communicate so that concerns may be raised early as the project goes forth. This project is anticipated to take several years, and good communication between the Forest Service, the State, and the counties will help this Project be successful while reducing unnecessary impacts. As there is no requirement for communication and coordination the State objects.

Conclusion

The State has previously supported this Project and absent the objection noted herein and possible future objections based upon modifications, the State offers wholehearted support of the Skyline Healthy Forests Restoration Act project. The State bases this support on the Forest Service's partial consistency with the State RMP and the Carbon, Emery, Sanpete, and Sevier County RMPs and because of the anticipated benefits to forest health.

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. The State looks forward to resolving the communication issues and coordinating with the counties and the Forest Service going forward.

The State appreciates the opportunity to submit objections and comments. Please contact me if you have any questions.