

COUNTY COUNCIL



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November 8, 2019

Ashley National Forest
Attention: Forest Plan Revision
355 North Vernal Avenue
Vernal, UT 84078-1703

Re: Summit County's (Utah) Comments on the United States Forest Service's Proposed Ashley National Forest Plan Revision

Dear Ashley National Forest Plan Revision Team:

This letter serves as official comments from the Summit County (Utah) Council on the U.S. Forest Service's proposed Ashley National Forest Plan Revision. We appreciate the opportunity to explain our interest in this issue and express our support for the sections of the Plan Revision that intersect with us as a County both in policy priorities and geography.

Summit County, Utah contains a unique wealth of scenic and wild, high-alpine natural landscapes, including mountains, rivers, forests, lakes, basins, plateaus and wilderness areas, many of which lie within public lands. Nearly one-half of the County is mountainous and much of the High Uintas Wilderness area is located within its boundaries. Public lands provide immense value to Summit County's local economy and quality of life, providing extensive public recreational opportunities.

As you know, Summit County is a cooperating agency on the Ashley National Forest Plan Revision effort. We became involved in this process for several reasons, primary of which was our interest in the High Uintas Wilderness, which extends into our County and the Uinta-Wasatch-Cache National Forest. In 2015, we initiated a collaboration with Ashley National Forest personnel and our neighbors in Wyoming on federal legislation known as the Public Lands Initiative (PLI) sponsored by Utah Congressman Rob Bishop. Our consensus proposal for this legislation, which we have attached to this letter, added new designations to the High Uintas Wilderness, totaling approximately 23,903 acres, as well as created a new watershed protection designation for other acres of land in the area that would allow targeted treatments to restore and protect critical watershed.

We are pleased that the proposed Ashley National Forest Plan Revision acknowledges the numerous headwaters of Utah's major rivers and the diversity of habitat in this area. We strongly support the Plan Revision's desired conditions for the High Uintas Wilderness (Chapter 3, pages 69-70) as essentially "unhindered and free from modern human control and manipulation."

Additionally, the Plan Revision recognizes that grazing is an “appropriate use of wilderness,” which was also a focus of the PLI effort we spearheaded in 2015. Grazing, particularly sheep grazing celebrates treasured heritage of the pioneers and ranchers in our community as well as helps reduce hazardous wildfire fuels in the wilderness and facilitates the germination of various plant species. Allowing this activity to remain in the High Uintas Wilderness is important to our community and to the long-term vibrancy and health of the Forest.

Further, we agree that the High Uintas Wilderness is a national and regional driver for tourism, recreation, the economy, and growth of communities and appreciate that one of the desired conditions for the wilderness area outlined in the Plan Revision is to “accommodate levels of recreation use” that are “ecologically sustainable” and provide “opportunities for solitude and primitive recreation.” As stated earlier in this letter, recreation is inextricably tied to the quality of life of our residents and constituents who value the access and respect the privilege to recreate in the wilderness.

In addition to quality of life, outdoor recreation and tourism also provide significant socio-economic benefits to our County. Summit County has a rich history of multiple use of public lands in support of an agricultural and natural resource-based economy and a significant recreation-focused economy.

Since 1998, the travel and tourism sector has steadily held approximately half of Summit County’s total private employment. In 2019, outdoor recreation was responsible for 3,311 jobs in Summit County, which is notable in a County with a total resident population of around 41,000 (in Utah we are a 3rd Class County considered medium-sized and characterized as rural with increasing urban demands). This number is expected to increase by 17.5% between 2019 and 2024, outpacing the national average of 12%.

Summit County also sees a substantial Gross Regional Product (GRP) generated from outdoor recreation. In 2018, looking at only a few of the industry sector codes, this totaled \$172.73 million, including hunting, backpacking and camping, sport and athletic retail and goods manufacturing, scenic sightseeing transportation, recreational equipment rentals, tour operators, skiing facilities, and other recreation industry.

At the state level, the Outdoor Industry Association found that Utah has a \$12.3 billion outdoor recreation industry that is supported by public lands. This industry supports 110,000 jobs in the state that generate \$3.9 billion in wages and \$737 million in state and local taxes.

However, even though we see great economic returns from recreation in the National Forest and other lands within our County, we must work to balance the benefits we get from tourism with the impacts this use has on the land. Already, we see tremendous growth in visitation in the Uinta-Wasatch-Cache National Forest and in other forests throughout the state and the user experience is deteriorating because of it. In addition,

there are considerable environmental impacts from this growth in the form of erosion, parking, human and domestic animal waste, trash, vandalism, and overuse in general. If we want to continue enjoying the pristine wilderness, we have to take measures to protect it and mitigate impacts.

As such, in terms of the standards for the High Uintas Wilderness outlined in the Ashley National Forest Plan Revision, we strongly support the prohibitions on the construction of new roads, energy and utility corridors, and recreation events, and the limitation placed on Administrative authorizations for the use of motor vehicles, motorized equipment and mechanical transport.

These standards comply with our County's desires for the roadless polygons in the High Uintas Wilderness expressed to the Utah Governor for his petition to the U.S. Department of Agriculture for a Utah specific roadless rule.

On another topic, Summit County also has a vested interest in how the Ashley National Forest Plan Revision addresses watershed, aquatic, and riparian ecosystems (Chapter 2, pages 13-17). Similarly to the Ashley National Forest, the lands of the Uinta-Wasatch-Cache National Forest located within the County's boundaries are home to the headwaters of four of the five major rivers in Utah (Duchesne, Provo, Weber and Bear) and numerous tributaries that supply critical drinking and irrigation water to Summit County and communities downstream, such as major population centers in the Salt Lake Valley.

As such, the Summit County Council takes stewardship of these waters and riparian areas very seriously. We are currently partnering with the leaders of the Uinta-Wasatch-Cache National Forest on leveraging funding to complete critical, NEPA-approved watershed protection projects on the Upper Provo watershed and are working with other partners on the Weber River to ensure it remains a protected water system.

Due to our shared interest in this issue, we agree with the desired conditions and guidelines outlined in the Plan Revision (pages 14-16). In terms of the riparian management zones (pages 16-18), while we acknowledge the language that restricts the use of pesticides and toxic abatement treatments for noxious weeds and vegetation, we would like these restrictions to be even stronger and urge the Forest Service to prioritize other methods first. We agree that combatting noxious weeds is important to sensitive habitat in the Forest as is mitigating mosquitos is to public health, however, these mitigation efforts cannot come at the cost of our aquatic ecosystems in these specialty transition areas. Once harmed or destroyed, these ecosystems are gone forever.

With that said, we strongly support the prohibitions on fueling and refueling, new roads, new landings, skid trails and log decks within riparian management zones. We also support the language the requires exceptions to these prohibitions to be considered by an aquatics specialist after site-specific analysis and implementation of mitigation measures are deemed appropriate to protect aquatic and riparian resources.

Finally, regarding fire (Chapter 2, pages 29-31), a large focus for Summit County and our surrounding counties is wildfire prevention, preparedness, and mitigation. Summit County is located within the urban wildland interface (WUI). Every residential and commercial area, whether it is in unincorporated county, incorporated city or town, or rural cabin community within the County's borders is inside the WUI.

The wildland ranges from sagebrush foothills to national forest and mountain peaks. Decades of drought, fire suppression, and climate change have resulted in a buildup of fuels in these lands, creating a dangerous environment set for catastrophic fire that if it occurred, could destroy thousands of homes, critical infrastructure, and the local economy. Catastrophic wildfire also poses a huge risk to the security of the water systems mentioned previously in this letter.

Summit County has partnered specifically with the Forest Service on addressing wildfire risks such as hazardous fuels in the Uinta-Wasatch-Cache National Forest and we continue to work with partners to find funding to help the Forest Service and their state partners complete treatments to remove those fuels in the Upper Provo Watershed.

We agree with the Ashley Forest Plan Revision's section on fire, particularly the objectives on fire management tactics, such as prescribed burns, tree removal, education and outreach to local communities, and other activities to effectively minimize the risk of loss of life, damage to property, and ecosystem function.

Thank you for your consideration of our comments and for working with us as a cooperating agency. We appreciate your efforts to update the Ashley National Forest Management Plan. Please contact me if you have questions or need additional information on anything we have shared in this letter.

Sincerely,



Roger Armstrong, Chair
Summit County Council