

COUNTY COUNCIL



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November 5, 2018

Attn: Ms. Kathleen Clarke, Director
Public Lands Policy Coordinating Office
Office of the Governor
State of Utah

Re: Summit County's Recommendations and Comments for the State of Utah's Petition to Establish New Management Provisions for Utah's Inventoried Roadless Areas.

Dear Director Clarke:

Thank you for the opportunity to participate in your office's effort to petition the United States Forest Service for a Utah-specific roadless rule. We appreciate the time your staff has taken to meet with us, provide materials, and address our questions.

Attached to this letter is the spreadsheet requested by the Public Lands Policy Coordinating Office (PLPCO) that includes all the roadless areas within Summit County's borders, along with our recommendations and comments regarding how to categorize those areas.

To arrive at these recommendations, Summit County Staff and members of our County Council toured many of the roadless areas with the Heber-Kamas Forest Service District Ranger, Dano Jauregui, met with community stakeholders including environmental conservation groups and analyzed the information provided to determine the best course of action.

The recommendations for the classification of each area are based on the four definitions provided to us by the PLPCO staff: (1) Primitive Areas; (2) Forest Restoration Areas; (3) Active Forest Management Areas; and (4) Re-inventoried areas.

On September 6, 2018, Staff presented their recommendations to the Eastern Summit County Planning Commission and held a public hearing. No member of the public spoke at the hearing. The Planning Commission voted to forward the recommendations to the County Council, deferring to us to make the policy decisions regarding Summit County's submittal to PLPCO on this issue.

On September 12, 2018, Staff held a work session with the County Council to present the Roadless areas and discuss the proposed classifications. The County Council met again on this issue on September 19, October 24 (included a public comment period), and November 7. As a result of those meetings, the Council voted to submit the attached recommendations and comments to PLPCO to consider for the Governor's petition.

The critical feedback that came out of this process is an interest from our community in preserving the current roadless rule and primitive nature of the areas within our borders. Many of our constituents feel the current rule is working and we should oppose any effort to change it, pointing out that allowing new roads, even if temporary, could make the fire danger worse since the majority of forest fires are manmade and start near roads.

While we agree with and support the majority of these comments, we also know our roadless areas are home to rampant dead or fallen timber caused by beetle kill and some flexibility should be given in these areas to remove these fuels in order to mitigate the risk of catastrophic fire. Since the dead timber is so widespread throughout the roadless areas, the only way to effectively remove it and significantly improve forest health is by making it possible, economically and in terms of removing red tape, for commercial industry to come in and provide the labor, tools, and resources at the level needed to make a meaningful impact.

Our biggest concern when it comes to the forest lands in our county is watershed protection and the impact fire in particular has on water systems. As you know, fire substantially alters and damages soil ecosystems, resulting in erosion and flooding, dumping silt, sludge, debris and other damaging materials in the rivers. The roadless areas located in our county fall within five prominent water sheds, which serve not only Summit County but also surrounding counties, such as Rich, Morgan, Utah, and Wasatch, as well as the communities located on the Wasatch Front. These watersheds are the Upper Weber, Upper Bear, Blacks Fork, Upper Green-Flaming Gorge Reservoir, and a portion of the Muddy.

You will notice in our attached comments that we recommend the “Forest Restoration” classification for the roadless areas in western Summit County and the “Primitive” classification for the eastern areas, which are slated for future federal wilderness designation consistent with the consensus proposal Summit County and a coalition of stakeholders submitted for Congressman Rob Bishop’s Public Lands Initiative. For these areas to be preserved as wilderness, new mineral extraction must be prohibited and motorized use limited.

Our goal by participating in this petition effort is primarily the health and safety of the forest and to increase the ability to remove potential catastrophic fire fuel sources in order to protect critical watersheds. We wish to maintain the primitive nature of these areas as much as possible. It is not our desire to exempt these lands from the Roadless Rule as a way to open them up for mineral extraction or other commercial uses or in an attempt to claim them for the state, removing them from federal management.

Our submittal is also an attempt to address the red tape and other barriers to fire mitigation as expressed to us by both U.S. Ranger Districts covering Summit County and Uinta County, Wyoming. While establishing the federal authority to address each roadless area is needed for health, safety and welfare, the biggest challenge facing effective fire mitigation in the forests is economic. There exists neither the manpower nor market to effectively remove all the dead and dying timber needed to substantially reduce the risk of catastrophic fire. We feel a significant investment from both the Federal and State governments are needed to employ people to remove the timber and subsidize the timber and ancillary industries to utilize the timber taken out of the forests.

Thanks again for inviting Summit County to participate in PLPCO's petition process. Please let us know if you have any questions about the recommendations we have provided for the roadless areas within our borders, or if there is additional assistance we can provide.

Sincerely,

Kim Carson
Chair, Summit County Council

DRAFT

| COUNTY | ID | NAME | FOREST | MGMT CATEGORY | COMMENTS |
|--------|------|-------------------------|---------------|-----------------|---|
| SUMMIT | 5530 | 401029 | Ashley | (2) Restoration | Polygon 99% in Daggett County. |
| SUMMIT | 5535 | 419020 | Ashley | (1) Primitive | Polygon shared between Summit, Daggett, Uintah, & Duschene Counties. Portion of area is slated for future wilderness designation. |
| SUMMIT | 6343 | 419020 | Ashley | (4) Reinventory | Polygon is 100% within Daggett County. Merge with 6405. (1) Primitive is preferred designation. Area is slated for future wilderness designation. |
| SUMMIT | 6405 | 419020 | Ashley | (1) Primitive | Polygon shared between Summit & Daggett Counties. Portion of area is slated for future wilderness designation. |
| SUMMIT | 5737 | 419022 | Ashley | (2) Restoration | Polygon 99% in Summit County. |
| SUMMIT | 6114 | 419022 | Ashley | (4) Reinventory | Merge with 5737. Following realignment, (2) Forest Restoration Preferred. |
| SUMMIT | 5489 | High Uintas | Wasatch-Cache | (2) Restoration | Merge with 6415. |
| SUMMIT | 5534 | High Uintas | Wasatch-Cache | (2) Restoration | |
| SUMMIT | 5813 | High Uintas | Wasatch-Cache | (2) Restoration | |
| SUMMIT | 5821 | High Uintas | Wasatch-Cache | (2) Restoration | Small polygon. Could be merged with either 6098 or 5825. |
| SUMMIT | 5825 | High Uintas | Wasatch-Cache | (2) Restoration | |
| SUMMIT | 6098 | High Uintas | Wasatch-Cache | (4) Reinventory | Portion of area is slated for future wilderness designation. Polygon should be divided between proposed wilderness and non-wilderness areas. Following realignment, (2) Forest Restoration preferred for non-wilderness (west); (1) Primitive preferred for proposed wilderness (east) areas. |
| SUMMIT | 6126 | High Uintas | Wasatch-Cache | (2) Restoration | Small polygon. Merge with 5825. |
| SUMMIT | 6415 | High Uintas | Wasatch-Cache | (2) Restoration | Polygon shared between Summit, Duschene, & Wasatch Counties. |
| SUMMIT | 4495 | Lakes | Wasatch-Cache | (2) Restoration | Small polygon. Merge with 6358. |
| SUMMIT | 4497 | Lakes | Wasatch-Cache | (2) Restoration | Small polygon. Merge with 6358. |
| SUMMIT | 5477 | Lakes | Wasatch-Cache | (2) Restoration | Small polygon. Merge with 6365. |
| SUMMIT | 5487 | Lakes | Wasatch-Cache | (2) Restoration | Small polygon. Could be merged with either 6358 or 6365. |
| SUMMIT | 5786 | Lakes | Wasatch-Cache | (2) Restoration | |
| SUMMIT | 6139 | Lakes | Wasatch-Cache | (2) Restoration | Polygon shared with Duschene County. Could be merged with 6358. |
| SUMMIT | 6352 | Lakes | Wasatch-Cache | (2) Restoration | Polygon shared with Duschene County. |
| SUMMIT | 6358 | Lakes | Wasatch-Cache | (2) Restoration | Polygon shared with Duschene County. Large polygon that could be merged with smaller adjacent polygons. |
| SUMMIT | 6365 | Lakes | Wasatch-Cache | (2) Restoration | |
| SUMMIT | 6469 | Lakes | Wasatch-Cache | (2) Restoration | |
| SUMMIT | 6094 | Little West Fork Blacks | Wasatch-Cache | (2) Restoration | |
| SUMMIT | 6095 | Little West Fork Blacks | Wasatch-Cache | (2) Restoration | |
| SUMMIT | 5638 | Mt. Olympus | Wasatch-Cache | (1) Primitive | Polygon shared with Salt Lake County. Located in remote area above resorts. |
| SUMMIT | 6189 | Nobletts | Wasatch-Cache | (2) Restoration | Polygon 95% is Wasatch County. |
| SUMMIT | 6375 | Widdop Mountain | Wasatch-Cache | (2) Restoration | |