



October 26, 2018

Mayor Ben McAdams
2001 South State Street, Suite N2-100
Salt Lake City, Utah 84112
ben@slco.org

Re: Roadless Rule Recommendations for the Central Wasatch Mountains

Dear Mayor McAdams:

Thank you for accepting our comments regarding Salt Lake County's recommendations to the State of Utah regarding potential exceptions to the 2001 Roadless Rule, which sets the criteria for Inventoried Roadless Areas. As the public water supplier to a significant portion of Salt Lake County, we are responsible for ensuring that Salt Lake County residents have access to clean, reliable, and affordable water. The water resources that are critical to this service emanate from the federal lands managed by the United States Forest Service (USFS) Uinta-Wasatch-Cache National Forest (National Forest). Specifically, these public water supplies emanate from City Creek, Red Butte, Mill Creek, Parleys Creek, Big Cottonwood Canyon Creek, and Little Cottonwood Canyon Creek watersheds. Portions of these watersheds contain Inventoried Roadless Areas pursuant to the Roadless Rule and are located in Salt Lake County.

Salt Lake City can attest to a century of collaboration with the USFS to restore and manage areas of the National Forest for the protection of public water supplies. Much of the collaborative restoration work over many decades, since the turn of the 20th century, includes mitigating the damage caused by historic mining, logging, and road construction in these watersheds. In fact, the watershed collaboration between the USFS and Salt Lake City is a legacy of the State's first pioneer settlers. As a result of this legacy of collaborative management, residents today relying on Salt Lake City's water supplies continue to benefit from the public health and economic underpinning that a reliable and high quality supply of water provides.

The Inventoried Roadless Areas have allowed portions of the headwaters to recover and establish natural watershed processes in a relatively undisturbed manner. This has provided a balance to other headwater areas of these watersheds that are intensely developed and used for commercial recreation. This balance of uses and management strategies has provided numerous benefits to the State and County. **Salt Lake City recommends that the Inventoried Roadless Areas in the National Forest located in Salt Lake County remain in the same classification as delineated by the 2001 Roadless Rule.** This will help keep an important balance of multiple uses and management regimes that has a proven record of providing clean and reliable water supplies, and a great quality of life for Salt Lake County residents.



The State has cited fire risk as a primary reason why the Roadless Rule needs to be modified. While the City acknowledges that work needs to be done with a variety of stakeholders to address issues like wildfire vulnerability on these federal lands, the City believes that the USFS already has the necessary flexibility and tools to address and manage fire risk in Inventoried Roadless Areas where the City's water supplies emanate. These tools include existing exemptions to the prohibition on commercial timber harvest where needed to maintain and restore ecosystems to reduce risk of uncharacteristic wildfire effects. Additionally, the current Roadless Rule puts no limits on the use of prescribed fires. Also, it already contains an exemption to its prohibition on road construction and reconstruction where needed to protect public health and safety in cases of an imminent threat of fire that would cause loss of life or property without intervention.

Analyses about whether, or to what degree, modifying the Roadless Rule would actually address challenges such as fire management or invasive species threats in the National Forest in Salt Lake County has not been provided. The four Management Area Exception categories proposed by the State lack any detail about how each may or may not address these threats. It also has not identified to the public instances where current exemptions under the Roadless Rule were inadequate to manage these threats. In other words, the connection between the Roadless Rule and the threats posed by fire and invasive species in the National Forest in Salt Lake County has not been outlined or explained. Additionally, the State has not engaged Salt Lake City—and likely other local jurisdictions - to assist in identifying the primary obstacles to tackling forest management issues. The City is not aware of an attempt to discover how a Roadless Rule modification might overlap or duplicate current or planned efforts of local jurisdictions already managing these issues on the ground.

Salt Lake City is also concerned by an apparent lack of transparency and public process for this effort. A handful of open houses has been held by State representatives only a week before County governments are to provide a recommendation to the State. The public has not had a meaningful opportunity to gain knowledge and provide input about this complex land use decision process. The State's website for this process has not been adequately advertised, is difficult to find, and is not captured by popular search engines. The website is also surprisingly sparse—there is just a brief FAQ, a list of the open houses, and contact information. This is not adequate outreach for the beginning of a decision process that affects all Salt Lake County and Utah residents.

The State has also put forward alternatives that may bias public input by providing too few considerations. The alternatives provided by the State include maintaining the status quo and various levels of reducing land protections. Salt Lake City suggests that the Management Area Exception Categories include alternatives that would provide more protection to Inventoried Roadless Areas. The City understands that more protective options were alternatives available for consideration for Roadless Rule Petitions in other parts of the United States.



We understand that protection of water resources in the municipal watersheds is an important consideration for Salt Lake County, and appreciate you focusing on these issues. Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

A handwritten signature in black ink that reads "Jacqueline M. Biskupski".

Jacqueline M. Biskupski
Mayor

Cc: Laura Briefer, Salt Lake City
Kimi Barnett, Salt Lake County
Mary Farnsworth, USFS
David Whittekiend, USFS