



March 13, 2017

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Doug Smith, Wasatch County Planner  
Wasatch County Planning Office  
55 S 500 East  
Heber, UT 84032

RE: Resource Management Plan for Public Lands

Dear Doug,

I have had a chance to review Chapter 5, Public Lands for your general plan, as well as the goals document that you sent me. As I understand from reviewing House Bill 323 and House Bill 219, the County's general plan shall contain a resource management plan for public lands to provide for the protection, conservation, development, and managed use of resources that are critical to the health, safety, and welfare of the citizens of the county and of the state.

The resource management plan shall be centered on the following core resources: energy, air, and water and shall:

- establish any relevant **findings** pertaining to the list of items in the bills,
- establish clearly **defined objectives** (goals); and
- outline **general policies and guidelines** on how the objectives are to be accomplished.

The goals, for the most part, are reasonable and address whether the County's intent is to protect, conserve, develop, or manage each resource. However, a few of them diverge into objectives and implementation strategies. I have redlined the goals document and attached it to this letter.

Additionally, reviewing the document is very cumbersome and confusing. It would be helpful to group the 26 subject areas into major areas. I have prepared a suggested list of groupings that are attached to this letter. I believe that by organizing the general plan elements it will be easier to see if there are areas that conflict with one another. It would also be helpful to be very methodical about the approach. Each subject area should first establish any relevant findings pertaining to the subject area (i.e. *Almost 60% of the Forest's watersheds provide drinking water for area communities, including Salt Lake City, Ogden and Logan.*), then clearly define the goals (as are currently in draft), then outline the general policies and guidelines to accomplish the goals.

Table 21 is a list of Land Ownership of Wasatch County with number of acres and percent of land in the county. It might be helpful to have a similar table that lists the current and historical uses and managed resources in each area.

These are just my suggestions. Please use them as you would like. If I could be of any more help please let me know.

Sincerely,

Alane E. Boyd, P.E.  
Principal

Cc: Sandy Wingert, Division of Water Quality

## Goals

NOTES: Incorporate language: should rather than shall, encourage, cooperate

Wording to be added to an introduction: Wasatch County intends to cooperate and collaborate with other agencies, including federal, state, or county agencies on the use of public lands.

## Resources:

1. Forest management; Maintain a healthy forest by following best management practices for reducing fire load, reducing forest disease, managing dead timber, and allowing limited grazing and timber harvesting.
2. Fire management; Sound fuel load management techniques should be used to minimize fire potential at the urban interface and throughout the forest and prevent catastrophic events by applying prescribed burns, allowing grazing where appropriate, and following weed management protocols.
3. Land access; Maintain multi-use access to and into public and tribal lands, including the historic, hunting, recreational, and mining access on public lands, providing the practice does not compromise environmental issues.
4. Air Quality; Air quality should be maintained at its current high quality. Uses on public lands should maintain these levels. State and Federal guidelines and standards described in the Utah State Implementation Plan approved by the EPA, whose authority is the Clean Air Act of 1990 should be implemented.
5. Water quality and hydrology, Wasatch County desires to ~~maintain or improve~~ protect and conserve water rights, groundwater, stream flows and water quality for protection of the health and well-being of county residents, as well as downstream users, and increase the desirability of the County as a place to visit and recreate. Public lands should protect the water resources flowing through them and eventually to downstream users.
6. Land use; Land use should remain for multi-use due to the recreational and open space values of public lands, except in situations where development is ancillary to a recreational use or state park and promotes the multi-use intent of the public lands. This includes land for grazing, mining, timber harvest, beneficial exchange of federal or state properties, and development done in environmentally sensitive ways.
7. Livestock and grazing;

The County recognizes the benefit of livestock grazing for maintaining a healthy forest and providing economic benefit to the citizens of the County. ~~Forage allocation reductions resulting from forage studies, drought, or natural disasters~~

~~should be implemented on an allotment basis and only when necessary. Reductions should be applied proportionately to all allocations unless it can be proven that a specific type of grazing animal is causing the land health degradation. Wasatch County recognizes that, in the event of fire, drought or natural disaster, a variety of emergency or interim actions may be necessary to minimize land health degradation, such as temporary reduced forage allocation for livestock and wildlife. Forage allocation reductions should be temporary and grazing allocations should be restored when forage production is restored.~~

~~Grazing rights should be restored if rights are analyzed and found appropriate.~~

~~Public land management agencies should endeavor to inspect riparian and sensitive areas with livestock permittees.~~

~~Lands and forage resources should be managed to optimize animal unit months and provide for t~~  
The continued viability of livestock operations and the livestock industry on Public Lands industry should be supported on federal and state lands within Wasatch County by management of the lands and forage resources and the optimization of animal unit months for livestock in accordance with the multiple-use provisions of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et seq., the provisions of the Taylor Grazing Act of 1934, 43 U.S.C. 315 et seq., and the provisions of the Public Rangelands Improvement Act of 1978, 43 U.S.C. 1901 et seq.

~~Predator numbers should be managed and controlled to protect livestock and private property values.~~

~~Wildlife and livestock interactions should be analyzed cooperatively among agencies.~~

~~8. Irrigation; Uphill canal owners should be encouraged to make canals as safe as possible so that downhill residential developments are not jeopardized if there is a canal breach.~~

~~8.~~

Historic irrigation water and conveyance facilities (canals and ditches) should continue to get delivered for agricultural uses to all downstream users.

~~Maintain-Protect~~ access to canals and pipelines for maintenance

9. Agriculture; Protect the rural agricultural economy of the County by establishing agricultural operations that may lease public lands or are adjacent to public lands as a priority use of the land, protecting existing and future agricultural operations, and encouraging farmers and ranchers to continue to farm the land.

Support multiple use public land policies to help in the continued maintenance of farm uses.

~~Interface between agricultural land and public land should be cooperative.~~

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**Commented [AB1]:** These are more specific objectives and not goals. I would delete

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~~Predator numbers should be managed and controlled to protect livestock.~~

10. Noxious weeds; Land management agencies and governments should work together in a coordinated effort to control and manage noxious weeds in Wasatch County. These interests should develop common management goals, facilitate effective treatment, and coordinate efforts through the County's "Coordinated Weed Management Area" program. (this is an existing goal in the GP)

11. Water rights and Water Resources;

Historic water use should be protected.

Any proposed action should include an analysis of the effects on water quality, stream flow, the amount of water yields, and the timing of those yields.

Any proposed action or non-action that results in a decrease in water quality, quantity, flow, or changes the timing of flows in a way that negatively affects water rights, should be opposed.

12. Ditches and canals;

Potential reservoir sites and delivery system corridors should be identified in land use plans and protected from actions that would prohibit or restrict future use for those purposes and maintenance of the delivery of water to the downstream users. Said plans should include provisions for adding or deleting potential reservoir sites and delivery system corridors when deemed appropriate. ~~Owners of ditches and canals should maintain their delivery infrastructure so that damage to property owners is minimized.~~

13. Flood plains and river terraces; ~~Maintain~~ Protect floodplain connectivity for wildlife and prevent construction in floodplains to minimize impact on residents and allow for the unencumbered natural flow of rivers and streams. Enforce FEMA standards adopted in County code.

14. Wetlands; Identify high-priority or ecologically sensitive wetland areas for conservation and preservation. Protect wetland functions and values to provide fish and wildlife habitats, natural water quality improvement, flood storage, shoreline erosion protection, and opportunities for recreation. These will in turn, protect the health and safety of the citizens of the County by reducing flood damage and preserving water quality.

15. Riparian areas; Conserve and protect riparian areas through application of best management practices and support the establishment of riparian buffer areas, which not only protect riparian plant and animal species, but also protect aquatic systems

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and resulting water quality.

16. Predator control; Predator numbers should be managed and controlled to protect livestock and private property values, and to prevent population decline in other wildlife species. Work with agencies to minimize impacts on farming and ranching operations.
17. Wildlife; Wildlife management agencies, public land management agencies and the County should work together to manage big game populations that are compatible with livestock grazing and are within the allocations set by the resource management plan. (in existing general plan).
18. Fisheries; Maintain, enhance, and expand sport fishing opportunities, while striving to prevent invasive species and maintain water quality.
19. Recreation and tourism; The County will continue to work with federal and state agencies to identify mutual economic objectives to expand tourism opportunities. All land use agencies should work together to make public lands a true asset for residents and visitors. Expansion of trail systems both on public lands and on private lands that tie into trail systems on public lands should be enhanced and encouraged. Partnerships with these entities will be formed when applicable and feasible.
20. Mining, Energy and Mineral Resources; The County should ensure that public lands are managed for multiple use and sustained yield, and managed to prevent waste and deterioration of natural resources. Mining, Energy and mineral resources should not be pursued at the expense of water or air quality or to the detriment of recreational opportunities. Further, these lands should be managed to prevent the loss of resources (and private property that may be located within or near public lands) from catastrophic events including, but not limited to, fire, flooding, insect and disease outbreaks and protection of the safety and health of the public.

The County will support the wise use, conservation and protection of public lands and resources, while allowing for energy development on a limited basis, including well-planned management prescriptions that are not detrimental to tourism and recreation, and the scenic values of the County.

The County will allow for extraction of minerals if not detrimental to tourism and recreation, and water and air quality.

21. Cultural, historical, geological, and paleontological resources; The County should work with agencies to protect and preserve the historical sites for the benefit of future generations.

The County should work with agencies to manage cultural, historic, and paleontological resources to allow research and/or interpretive activities, when possible, while protecting significant attributes of units from natural or human-caused

degradation.

22. Wilderness; Wasatch County will collaborate with the National Forest Service in the management of lands as de facto wilderness management regimen through additional roadless or unroaded area reviews.
23. Wild and scenic rivers; Wasatch County will work with federal agencies to avoid designating rivers as wild and scenic if the designation would adversely affect the economic interests of the county, including enjoyment of private property rights, mineral extraction, timber harvest, agriculture, water rights, water storage, or water delivery if these can be done in a manner to protect water quality.
24. Threatened, endangered, and sensitive species; No threatened or endangered species should be proposed for listing in Wasatch County until verifiable scientific data has been made available to the public that there is a need for the designation that protections cannot be provided by other methods, and the area in question is truly unique compared to other area lands. (existing GP language)
25. Law enforcement; Wasatch County law enforcement has enjoyed a long history of collaboration with state and federal law enforcement. Wasatch County should continue to work with state and federal law enforcement agencies and provide support where necessary to maintain public health, safety and welfare.

Wasatch County recognizes that there are numerous recreational activities on public lands. On many weekends, law enforcement may be overwhelmed with responses to various law enforcement issues. Due to the County having three state parks and federal forests within its boundaries, the various law enforcement jurisdictions must work together and communicate well.

26. Economic considerations;

The County recognizes that resource use or development on private, public, or tribal lands should be sensitive to the County's rural lifestyle, quality of life, and scenic environment. We also understand that many of the visitors to this county come because of the public lands and their multi-use opportunities. Specific County interests to protect, maintain, and expand natural resource use and development include:

- Maintaining multiple-use management of public lands,
- Preserving public access, and
- Identifying existing and potential areas of development.

# Suggested Grouping for Public Lands Document

## Water

- Water Quality and Hydrology
- Water Rights
- Water Resources
- Ditches and canals
- Flood Plains and River Terraces
- Wetlands
- Riparian Areas
- Wild and scenic rivers

## Land

- Land Use
- Land Access
- Fire Management
- Wilderness
- Geological and paleontological Resources

## Agriculture – cultivating soil, producing crops, and raising livestock

- Livestock and grazing
- Irrigation
- Agriculture
- Noxious Weeds

## Wildlife – Living things, especially mammals, birds, and fishes that are not domesticated

- Predator Control
- Wildlife
- Fisheries
- Threatened, endangered, sensitive species

## Extraction

- Forest Management
- Mining, Energy
- Mineral Resources

## Other

- Cultural and historical Resources
- Law Enforcement
- Economic Considerations
- Recreation and tourism
- Air Quality