



BACKCOUNTRY HUNTERS & ANGLERS NEVADA

To whom it may concern,

Backcountry Hunters and Anglers is nationwide organization with state and province chapters across North America. Our stated mission is to advocate on behalf of wildlife and wild places to maintain our tradition of public land hunting and fishing.

We recognize the current, altered ecological state of many portions of the Humboldt-Toiyabe National Forest. However, this scoping proposed action document fails to convince the novice reader that prescribed burning is the most effective method to rectify departures from natural fire regimes and address the current challenges to the ecological conditions in Nevada. There are many existing disturbances (such as livestock grazing and feral horses and burros) and new challenges (such as invasive annual grasses and noxious weeds) that may affect the outcome of prescribed fire in Nevada. We would offer that these factors are inadequately addressed and analyzed in the document. Creating the optimal mosaic of varied habitats within the Great Basin is clearly a worthy cause, but we are concerned that the scale and scope of prescribed fire may not be the best management technique for achieving that objective. We wonder what are the existing model areas within the Great Basin which successfully demonstrate that prescribed burns on a large-scale results in both improved habitat health, reduction of massive wildfire events and/or ability to suppress them more quickly? There is scientific literature and research suggesting that many sagebrush habitats are not as fire-dependent as suggested in the document. Within Nevada, a variety of sagebrush habitat is not suffering from too little fire, likely the exact opposite. We're losing sagebrush habitats at an alarming rate due to wildfire and expansion of invasive weed monocultures. We would prefer to see greater efforts be made to rehabilitate existing wildfire through post-fire treatments.

With regards to Pinyon-Juniper expansion, we agree this is an issue that should be addressed, but it seems unclear if prescribed fire is an effective forest management tool in these habitats, especially given there are options for treating these areas. A comparison of using fire versus strategies such as mastication, lop & scatter or chaining should be completed and included in the document.

Given this project's projected magnitude in both scope of acreage and length of project timeline, an environmental assessment seems a more appropriate way to comply fully with NEPA. Unique characteristics in future project areas could certainly be adversely affected and an EA would help identify and avoid unnecessary risks or impacts association with more fire in Nevada.

We couldn't agree more with the document's statement, "there is a need to develop a long-term strategy to identify and conduct prescribed fire in vegetation communities most in need of restoration(pg. 2)," however developing a strategy by outlining a project that almost exclusively uses a singular management tool, fire, seems akin to putting the cart before the horse. Moreover, this document would approve projects through lessened NEPA analysis and does not appear to support developing a long-term, and site-specific strategy.

We wonder whether the Humboldt and Toiyabe LRMPs, even as amended, adequately take into consideration the changes described in "Purpose, Need and Objectives" in the intervening 35 years since



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the LRMPs were created. It's unclear and unlikely that the "Desired Condition" objectives would be met by implementing prescribed fire at the scale indicated in the document.

Given the likelihood that many acres will naturally burn throughout the duration of this project, we believe funds would be better spent in recovering habitat after wildfire rather than in prescribed burns. Additionally, these monies could be put toward less risky non-fire habitat recovery projects in a wider array of habitats.

This document concludes an annual prescribed fire need of up to 80-100k acres, based on the proportion of the HTNF that is highly departed from historical condition (pg 3). This statement does not appear to be supported in the maps provided at the end of this document when considering large portions of the HTNF are categorized as moderate or low level of departure from historical condition. We also note that many of the high elevation areas with high likelihood of natural recovery on the landscape are excluded from prescribed fire due to Wilderness exclusions. It is unclear from scoping proposed action document the details of how departure was defined and if the analysis accounts for areas where there are now fire intervals that are more frequent than what would be desired. The proposed burn rate of 80-100k acres per year seems to exceed the number of acres potentially available for prescribed fire. We would also recommend that implementing prescribed fire does not hamper the Forest Service's ability to conduct fruitful post fire rehabilitation.

With respect to design element 23, we question whether an up-to-date, accurate assessment of invasive weed infestations is in place. For instance, large portions of the northern Independence Range, Bull Run Mountains, and the Wild Horse range within the Mountain City-Jarvis Ranger District are still characterized as low departure from historic vegetation regime. It would be our observation that this is not the case. Since the South Sugarloaf Fire in 2018, very little fire restoration work was conducted and this area has a high percentage of cheatgrass groundcover. Similar outcomes have occurred with the Cherry and Chorda fires as further examples. We anticipate an increase of cheatgrass is a likely and predominant outcome for other areas designated for prescribed burns.

We would request that state fish and wildlife agencies, specifically Nevada Department of Wildlife be included within section 3 of the implementation checklist.

In conclusion, a project of this magnitude is concerning to BHA as the proposal lacks detail and ability to comment specifically on where prescribed burns are, and are not, going to be conducted. These areas have yet to be clearly identified, and much of the analysis included is too broad to clearly understand how and where prescribed fire could be used or if it is the best approach for managing habitat. We feel there are many more factors at play in determining whether prescribed fire is beneficial in Nevada than have been discussed in this document.

Thank you for your consideration of our questions, comments, and concerns,

David Ricker, Policy Chair, NVBHA

