



File Code: 1570
Date:

Dear Objector:

As required by [Title 36 of the Code of Federal Regulations \(CFR\), Section 218.11\(b\)](#), this letter is my response to the objection you filed to the proposed Prescribed Fire and Restoration Project on the Manti-La Sal National Forest (NF). Acting Forest Supervisor Barbara Van Alstine is the Responsible Official. I am providing a written response to your objections; however, this response need not be point by point. I convened a team of independent subject matter experts to review the project in context with your objections. Thank you for providing your objections and suggested remedies. I value your engagement, time, and participation in the management of our public lands.

On November 8, 2023, the Manti-La Sal NF Prescribed Fire and Restoration Project Environmental Assessment (EA), Draft Decision Notice, and Finding of No Significant Impact was released. The Legal Notice of Opportunity to Object was simultaneously published in the newspaper of record, the ETV News Sun Advocate, commencing the pre-decisional administrative review (objection) process outlined in the regulations at [36 CFR 218, Parts A and B](#).

PROJECT DESCRIPTION

The proposed project would authorize prescribed burns across the Forest every year up to 31,250 acres per year. Treatment boundaries would be designed to meet objectives and move areas toward desired conditions. In the context of this proposed action, treatments include not only the type of fire applied to achieve an objective, but also the pre-fire actions, also known as burn preparation, needed to facilitate the application of fire.

The decision may be implemented across approximately 1,220,283 acres of the Manti-La Sal National Forest on National Forest System (NFS) lands. This proposed action does not apply to lands within the boundary of the Bears Ears National Monument at the time of implementation, any congressionally designated wilderness areas, sage grouse seasonal occupied habitat, research natural areas, alpine areas, or any non-NFS lands within the National Forest boundary.

Specific treatment areas would be identified through a hazard classification and landscape prioritization process. Prior to using any prescribed fire, verification of specific treatment areas would be conducted by an interdisciplinary team of resource specialists to ensure treatment location and design are consistent with prior planning decisions and direction. The design elements and implementation checklist are key elements of the proposed action which help to ensure statutory and regulatory requirements would be met.

OBJECTION ISSUES RECEIVED AND RESPONSE

Objections raised fall within the following general categories: climate change, wildlife impacts, National Environmental Policy Act (NEPA) and Forest Plan compliance, old growth, Roadless Rule compliance, and non-native invasive species.

An objection resolution meeting was held on March 6, 2024. This meeting allowed me to better understand the objection issues being raised and the suggested remedies. I appreciate the diligence and effort from all the participants.



I have reviewed and carefully considered your objections and suggested remedies. In accordance with [36 CFR 218](#), I have also reviewed the attendant project record, EA, and draft Decision Notice and Finding of No Significant Impact. Please see Enclosure-1, *Response to Objections on the Manti-La Sal NF Prescribed Fire and Restoration Project*. Based on my review, I have identified instructions for the Responsible Official. In accordance with [36 CFR 218.12\(b\)](#), these instructions must be addressed before a decision notice can be signed, unless otherwise explicitly noted.

- Review design element WLD 16 for specificity regarding how minimization and avoidance efforts would be implemented.
- Add “wetlands” to design element HS1.
- In the Decision Notice, include rationale and scenarios describing the use of mechanical treatment.
- Define “generally small diameter timber” to be consistent with the Roadless Briefing document.
- Add design elements consistent with Forest Service Manual (FSM) 2900 and Forest Service Handbook 2080 that reduce the risk of non-native invasive plant expansion.
- In design element BOT 1, incorporate objector’s suggested language (consistent with FSM 2070.3): *If determined that native vegetation would not sufficiently recover on its own and seeding is necessary, native seed will be given primary consideration, to the extent practicable. Non-native, non-invasive seed may be used during emergency situations to stabilize soil, protect, or restore water quality, or prevent the establishment of invasive species. When native seeds are not available or economically feasible, in highly altered plant communities, or to maintain historical integrity on designated cultural sites, select non-native plants may be used as temporary, non-persistent plant materials provided they will not hybridize with local species, will not permanently displace native species or offer serious long-term competition to the recovery of endemic plants, and are designed to aid in the re-establishment of native plant communities. Seed mixes will be chosen that are certified weed free and suitable for site characteristics and ecological setting.*
- Include a reference citation for the claim statement in the EA that prescribed burns are beneficial to biological crusts.

CONCLUSION

Per the regulations at [36 CFR 218.11\(b\)\(2\)](#), my review constitutes the final administrative determination of the Department of Agriculture. No further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available.

If you have any questions or concerns, please contact Jennifer Purvine, Regional Administrative Review and Litigation Coordinator at jennifer.purvine@usda.gov.

Sincerely,

DEBORAH OAKESON
Deputy Regional Forester

Enclosure

cc: Barbara Van Alstine, Chris Moyer, Jennifer Purvine