Data Submitted (UTC 11): 11/10/2021 11:00:00 AM
First name: Richard
Last name: Spotts
Organization:
Title:
Comments: Please carefully review my attached scoping comments letter and the associated previous scoping letter.

Thank you very much for your consideration.

Please accept, carefully consider, and include in the project file my following scoping comments on the above-referenced proposed project.

At the outset, I have been a Washington County Utah resident for nearly two decades, and I am generally familiar with the areas where this proposed action may occur.

I deeply care about the future management of these areas. I strongly believe that these public lands and resources should be managed in the long-term public interest to maintain and restore the abundance, diversity, and productivity of native wildlife and plant communities. Management should emphasize sustainability and resiliency in the face of climate change and other increasing threats. Only proposed actions that would truly advance these necessary purposes should be approved and implemented. The climate and extinction crises are worsening, and traditional status quo management is no longer appropriate. Management should rapidly adapt to environmental changes and emerging threats, and place fidelity to law, best science, and serving the broad public interest above other interests.

I carefully reviewed the scoping information on the Dixie National Forest web site. There is clearly some overlap, in terms of treatment methods and areas, with this proposed action and what was previously proposed for the Pine Valley Wildlife Habitat Improvement Project. I submitted extensive scoping comments on this previous project but never learned how or whether my comments were addressed nor whether this or a modified project moved forward and was approved. I have found that it is very difficult and confusing to try to follow Dixie National Forest NEPA processes and how they may interact, work together or at cross purposes, and pose potential cumulative impacts that differ at various spatial and temporal scales. My previous scoping letter dated December 12, 2019 is attached. Please reconcile this previous proposed project, and where it stands, with this current proposed action.

Overall, I was surprised by the incredible breadth of this current proposed project and amazed by the fact that no Notice of Intent (NOI) was published in the Federal Register to announce this scoping opportunity for preparation of a Draft Environmental Impact Statement (DEIS). Except for statutory wilderness and research natural areas, this proposed action covers the entire forest, about 1.8 million acres (including inventoried roadless areas). If approved, this "project" (actually, a large ongoing "program") would treat up to 52,000 acres each year.

While the project title says the purpose is prescribed fire, I believe that this could be a dishonest "Trojan horse" description because a variety of "pre-treatment" methods could occur prior to each prescribed fire. These methods may include mechanical chipping, mastication, thinning, and cross-country motorized vehicle use. Normally, when prescribed fire is coupled with these other vegetation treatment methods, the project title is more honest in terms of including "vegetation treatment", "fuels reduction", or, in the previously described Dixie National Forest example, "habitat improvement." I think that limiting this project title to prescribed fire is at best unnecessarily misleading and confusing, and at worse an improper attempt to low ball proposed treatments that likely otherwise may be more controversial.

Given the massive acreage involved, the broad discretion about what pre-treatment (including ground disturbing)

methods may be used, and the lack of clarity about how any subsequent NEPA compliance and associated public involvement would occur, this proposed "project" should be covered under a Federal Register NOI for scoping and preparation of a DEIS. Under the CEQ context and intensity criteria, I cannot see how the Forest Service could properly get to a FONSI for something that is factually a large ongoing vegetation treatment program that includes prescribed burning. I therefore recommend that this current EA level scoping be halted and a NOI be published for a DEIS, unless the Forest Service simply intends to use the EA process as a foundation for a subsequent DEIS.

In terms of scoping, there are many important issues. Reconciling the previously described Dixie National Forest habitat improvement project, and likely others, with this proposed action is necessary. It is important to know the relevant context in terms of what other approved or proposed projects could affect the same areas and resources as this current proposed action. Among other things, this will help to identify connected or similar actions as well as potential cumulative impacts.

The Nature Conservancy and Dixie National Forest have had positive coordination and collaboration in conducting the Landscape Conservation Forecasting (LCF) analysis process for the Pine Valley unit. This LCF is valuable in providing science-driven vegetation management options and recommendations to land managers. Indeed, this LCF process was successfully used elsewhere in Washington County to assist BLM in managing the Red Cliffs and Beaver Dam Wash National Conservation Areas. For this current proposed action, it is important to know how the LCF findings would be used by the IDT teams in designing and implementing specific project-level treatments and burns. Where solid science exists along with professional recommendations, that should be used wherever possible.

Ranchers tend to support these types of projects because they may increase forage for their livestock. Fatter cattle at auction get higher prices. I am concerned that rancher pressure or influence may skew whether or how the Forest Service conducts these projects. It is unfair for the public to pay enormous amounts to improve Forest Service lands when ranchers may obtain much or most of the resulting benefit in greater private profits.

Commercial livestock grazing has contributed to many of the existing land health problems. Solutions must go to the actual causation of the problems, including further limiting or removing livestock from degraded areas, particularly during this mega drought when vegetation is already severely stressed. The Forest Service does not properly manage commercial livestock grazing in most areas, so there is a conflict when public investments are made to improve ecological health and resilience while harmful private uses are allowed to continue. The right hand of the Forest Service needs to reconcile what the left hand is doing.

Depending on the specific circumstances, prescribed fire and any ground disturbing pre- treatments may adversely affect important biological soil crusts and stimulate the further colonization and spread of harmful cheatgrass and other invasive/noxious plants.

A USGS scientific report covering the Great Basin indicates that livestock grazing contributes to this dangerous colonization and spread of cheatgrass and other invasive annuals that are dramatically changing fire ecology. This report also indicates that livestock grazing is not an effective method to control cheatgrass, or to hinder or prevent widespread cheatgrass fires. Livestock trample and compress soil, transport seeds on their hide or through their feces, prefer eating native plants, break up crucial biological soil crusts, and create other adverse impacts that combine to benefit cheatgrass and other invasives.

As such, the greatest threat to the long-term success of these proposed vegetation treatments is that cattle grazing will be allowed in a manner that undermines treatment effectiveness and that substantially increases the risk that cheatgrass may overtake the treatment area.

This proposed action has a design feature of two growing seasons of livestock grazing rest after treatments.

However, there is an exemption where the IDT teams could alter this rest period. IDT teams might primarily be comprised of the same government employees who have collectively failed to properly manage livestock grazing. This design feature may therefore be illusory and not consistently followed. In addition, two growing seasons may not be sufficient during a mega drought when it will take much longer for vegetation to recover.

These types of prescribed fire and vegetation treatment projects have a mixed record in terms of achieving their purported purposes. Sometimes they reduce soil erosion, create more understory vegetation, and improve habitat diversity. Other times they cause an explosion in cheatgrass and other invasive species, and premature livestock grazing diminishes the potential for improvements to occur or be sustained. There is always a risk that these publicly funded treatments may fail or even somewhat backfire. This risk will likely increase going forward given the continuing spread of invasive species and the prospect for more prolonged droughts due to climate change.

In addition, the more we learn about biological soil crusts, the more that we appreciate their importance in terms of stabilizing soil, holding nutrients, and impeding the spread of invasive species. These soil crusts are fragile and some proposed treatment methods would destroy them. A delicate balance should occur to prefer the treatment methods that have the best chance for success along with the least chance for failure. This normally means to avoid or at least greatly reduce those treatments that cause soil disturbance and thereby threaten to destroy beneficial biological soil crusts while helping harmful invasives.

I hope that my scoping comments are helpful. Please add me to the project notification list for this proposed action at my contact information below.

Thank you very much for considering my comments.

Attachment: Dixie NF 12-12-19 scoping letter