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Title:

Comments: Attached are EPA's comments on the Prescribed Fire Landscape Resiliency Project.

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service October 2021, public scoping notice to prepare an Environmental Assessment (EA) for the Prescribed Fire Landscape Resiliency Project in the Dixie National Forest (Forest). In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), we are providing scoping comments. These comments convey important questions or concerns that we recommend be addressed during the NEPA process.

The Forest stretches across 170 miles in Southern Utah. It's located in Garfield, Iron, Kane, Piute, Washington and Wayne Counties and is the largest national forest in Utah. It's adjacent to three national parks (Bryce Canyon, Capitol Reef and Zion), two national monuments (Cedar Breaks and Grand Staircase-Escalante), Red Cliffs National Conservation Area, and multiple wilderness areas and towns.

According to the scoping documents the Forest is proposing to adopt a landscape-scale prescribed fire program to reduce the risk of uncharacteristic wildfires, increase resilience of existing vegetation groups, and improve ecological function in native vegetation communities and wildlife habitats. It states the proposed decision would authorize the use of prescribed fire and associated treatments across approximately 1.8 million acres of national forest lands within the 1.971 million-acre Dixie National Forest. Within the project area, the USFS will apply prescribed fire up to 52,000 acres across the Forest annually depending on a variety of factors. The proposal does not include information about specific burn units. The scoping documents indicate an interdisciplinary team will use up-to-date data to identify specific burn units and apply design features and the implementation checklist list (both in the proposal) to individual burn plans prior to conducting treatments. Based on available information, it's does not appear the Forest plans to conduct site-specific information and analysis of the individual burn units prior to initiating prescribed burn actions. Our review did not identify a timeframe under which actions could be taken and the program appears to not have an identified end date.

The EPA is generally supportive of well-designed prescribed fire projects as an ecologically preferable forest management practice. Based upon our preliminary review of the information provided at scoping, it appears the Forest is implementing a programmatic (vs. site-specific) approach and analysis that would authorize on-the-ground burn actions without requiring future, site-specific NEPA analysis for burn projects. Given the size and duration of the program, the lack of site-specific information and analysis, and potential for significant water quality, air quality and ecological impacts, it is not clear how the proposed Environmental Assessment and Finding of No Significant Impact (FONSI) will ensure significant impacts will be avoided for this program. Rather, we recommend the Forest consider a programmatic NEPA document that commits to site-specific NEPA post decision and provides opportunities for public involvement and comment on individual treatment projects. Our comments and recommendations are intended to assist in the NEPA process as the Forest conducts the impacts analysis and develops project design features, best management practices (BMPs) and monitoring plans. There are several important topics associated with this type of project that we recommend including in the scope of the EA, including:

- [middot] Area management objectives for high severity wildfire risk, public and infrastructure safety, and forest regeneration and restoration;

- [middot] Range of alternatives for reaching the management objectives, and a discussion of the science supporting the ability of each alternative or project action to meet the objective;

[middot] Resource objectives and site-specific baseline conditions, including pest and disease status and trends, vegetation cover and condition, soil conditions, watershed conditions, water quality, sediment loads, wetland and riparian health, wildlife and fish population and habitat health and trends, climate change and air quality;

[middot] Site-specific impacts on these baseline resource conditions that would likely result from project activities associated with each alternative and a comparative assessment of how each alternative will affect attainment of resource objectives in the Forest Plan;

[middot] Site-specific ecological history, including bark beetle, disease, and wildfire histories;

[middot] Management history, including vegetative treatments, invasive species control, grazing and prescribed burns;

[middot] Monitoring plan that will be used to assess how well the selected alternative addresses concerns associated with each resource category determined to be significant through scoping.

With this program, it will be important to ensure projects avoid:

[middot] contributing to violations of Utah's water quality standards, especially on waters included in Utah's 303(d) list of impaired waters;

[middot] impacts to irreplaceable resources such as fen wetlands; and,

[middot] air quality impacts that could affect people with respiratory conditions who may be sensitive to particulate matter.

There is a concern with the long duration of this prescribed fire program. Landscape ecological conditions can change substantially over relatively short durations due to insects, fire, flood, wind events or drought. Additionally, forest science is rapidly evolving, and there is the potential for new listings of threatened or endangered species, or changes to law or policy over longer timeframes. It is difficult at best to design a prescribed fire program that anticipates and responds to changes in forest ecology, climate, science, law and policy over medium and long durations. We recommend including details on how the program will respond to these types of changes or commit to formal reviews of the NEPA sufficiency every five years under a process that includes a public engagement and review process.

We appreciate the opportunity to provide comments at this early stage of the NEPA process. These comments are intended to facilitate the decision-making process; thank you for considering our input.

If we may provide further explanation of our comments, please contact me