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April 19, 2021

Fishlake National Forest
Attention; Russ Ivie, Forest Fuels Program Manager
115 E. 900 N.
Richfield, UT 84701

Re; Comment on "Forest-wide Prescribed Fire Restoration Project"

Dear Mr. Ivie

I and my wife own a home located at the south end of Fish Creek Cove on a 160 acre parcel that borders the Teasdale District. We have owned this property since 1980, and are very familiar with the surrounding forest lands. Like many of our neighbors on the Teasdale Bench, we are concerned about the risk of wildfire on the Teasdale Bench. I am writing to you to comment on the "Forest-wide Prescribed Fire Restoration Project" dated April, 2021.

Please include my comments in the permanent files and records of Fishlake N.F regarding this project, and in addition please include me on the official roster of persons entitled to receive advance notice of all future actions to be undertaken under this project with the Teasdale Ranger District. I would appreciate it very much if you could email me confirmation of your receipt of my comments.

Thank you for giving my comments your attention and consideration. If I can be of help in any way, please don't hesitate to contact me.

1. **Future Public Involvement in Implementation Decisions.** The scoping documentation fails to describe how stakeholders and the public will be involved in the design and implementation of specific burn projects. The

scoping documentation, along with any proposed decision documentation, should include specific requirements regarding public notice and opportunity for involvement, including;

- a. 90 day advance notice of all future actions relating to the selection of proposed prescribed fire areas, including an opportunity to comment.
- b. 90 Day advance publication in the local newspaper ("The Insider") of the selection of prescribed fire areas within the Teasale District, and similar notice for all subsequent implementation actions.

2. **Discussion and Analysis of the Future Management of Factors that led to the current situation.** The scoping notice recognizes that past human activities, including livestock grazing, timber harvesting, fire suppression and the introduction of invasive species resulted in the current condition of the forest with respect to fuel loading. (p. 1). However, the project as described in the scoping document fails to consider whether these activities will be modified in the future, and what contribution modification in these areas could help reduce fuel loading. Given that all these human activities have contributed to forest wide fuel loading, logic indicates that the scoping document should have given careful consideration to the ways in which these activities should be modified in the future to help prevent the more fuel loading in the future. Making careful plans to burn the weeds at the end of the yard may be helpful, but a better approach would be to look at how to keep the combustible materials from building up inside the structure.

3. **The Scoping Document does not include quantifiable measures for the productivity, diversity and health of plant and animal communities.** The scoping document should include quantifiable measures for these desired goals. Lacking quantifiable measures it will not be possible in the future to determine to what extent the prescribed fire program has contributed toward these laudable goals. As a result of funding limitations in past decades, it has not been possible for the FS to develop strong and reliable baseline data sets that could be used to create comprehensive models of forest health conditions. The first step in designing a prescribed burn project would be to recruit agency and

academic scientists to design a plan for creating thorough and comprehensive inventories of all baseline conditions that relate to forest health, which could subsequently be used for quantifiable evaluation of the effects of specific prescribed burns.

4. **Economic Considerations and Efficacy Analysis.** The scoping document fails to adopt or even propose any quantifiable measures for evaluating the cost effectiveness of any given prescribed burn. The scoping document should include, within reasonable ranges, the anticipated implementation costs “per acre” of standard categories of prescribed burns. Given the lack of quantifiable measures for forest health, it is probably impossible to assign realistic values to a benefits vs. costs analysis of a prescribed burn in dollar amounts. This suggests that the agency (and the public) will never know what increment of increase in forest health was obtained in exchange for the implementation costs of a given burn. It may well be spending similar sums on helping with the management of risk in the Wildlands Urban Interface (WUI) would be much more cost effective from a public perspective.
5. **Historical Hubris v. Real World Complexity.** Throughout most of the last century, the FS assumed that fire in any form, in any place, was harmful to the forest, and that the proper reaction was to prevent or put out all such fires. Today, as the result of more recent science, we know that this view was wrong. It is worth considering whether the agency today is making a similar mistake today, electing to draw broad conclusions about the extent and character of historic fire across a million acre landscape, ignoring for the most part the complexity inherent in the hundreds of different micro-terrains that make up the actual forest. Prescribed fire is certainly a tool that should be available to forest managers. However, past history suggests that it will be best applied on an experimental basis, applied to smaller, well defined areas, where strong data collection is possible both before and after the fire event.
6. **The Schedule of Project Design Features is Inadequate.** The scoping document includes schedules of a number of design features mandated by FS manuals and planning documents. Most of the design features are “discretionary”, meaning they can be applied or not at the discretion of

agency officers. Very often, granting the agency this level of discretion means that the suggested design features are generally ignored on the ground. FS field officers, facing real world time and financial pressures, combined with the demands of contractors and interested stakeholders, are unable to insist on the rigorous application of discretionary features. Rather than referring to a discretionary rule book, the scoping document should require that the agency should designate and fund an impartial, appropriately credentialed, “on site” umpire from outside the agency, empowered to rule on all discretionary design decisions.

7. **Failure to Include Analysis of Climate Change Factors.** Recent court decisions have emphasized the importance of addressing climate change factors in agency planning. This prescribed project describes the potential burning of 400,000 acres of forest, substantially increasing the carbon contribution to the atmosphere over a relatively short period of time. Forest regrowth, if it occurs, will involve the recapture of atmospheric carbon over a period of centuries, well into a new and different climatic regime throughout Utah and the southwest. No proposed project of this scale and magnitude can be considered complete without a thorough analysis and consideration of potential climate change impacts.

Thank you again for giving these comments your attention and consideration.

/s/ Scott Berry