Fishlake National Forest Supervisor’s Office; Attention: Prescribed Fire Project Comments;

115 East 900 North; Richfield, UT 84701.

Comments on the “Forest-wide Prescribed Fire Restoration Project”

In preparation of an Environmental Assessment for this proposed project I ask that you consider and respond to the following comments. Acronyms or other references, unless defined in this letter are as defined in the Proposed Action.

1. The reference material being relied on in the Proposed Action for Scoping is dated as to current conditions cited in the Need for the Project. Specifically, the LANDFIRE 2016 data set is as old as 2010 or older and the Fishlake Land and Resource Management Plan (Fishlake LRMP) is dated 1986.

Given the extreme impacts since 2010 in the area managed by the Fishlake LRMP impact considerations should be addressed on what areas in the proposed plan would have to change given an updated LANDFIRE 2016 data set and a revised Fishlake LRMP.

1. The Proposed Action doesn’t address the impact on Goshawk habitat or species numbers.

Based upon the Fishlake LRMP, Monitoring Report\_2020, Goshawk numbers are decreasing. It is noted in the results for the Goshawk territory occupancy study that Goshawks abandoned the area associated with the 2013 Clay Springs Fire. Attention to the quantity of downed logs and woody debris in any prescribed burn area pre and post burn needs to be considered as directed for the Northern Goshawk recommendations.

The Fishlake LRMP currently requires a minimum of one year and up to two years of habitat monitoring before prescribed burns.

1. The Proposed Action doesn’t include the procedure for public involvement before any action can take place. Given the impact that a proscribed burn could have within an area or if containment were lost to surrounding areas needs to be taken into account.

Given that the Fishlake LRMP requires monitoring every two years to gage compliance therewith, the Proposed Action should include an Environmental Assessment, before any unit is burned addressing, as a minimum, the Design Feature listed in Table 1 of the Proposed Action as well as comments received from the public given proper public notice and review period. The Fishlake then needs to issue a finding that could, if need be, appealed.

1. The Environmental Assessment needs to evaluate desired criteria post prescribed burn. As an example, would selective under story removal or selective logging accomplish the same objective as burning? Could procedures and actions dealing with natural, or man induced wildfires be changed to accomplish similar expected results imagined in the Propose Action? Without future discussion and analysis how can the public be assured that all alternatives, as mandated by NEPA, have been considered?
2. The Proposed Action needs to specifically address the impact on quaking aspen groves such as the Pando.

Given the impact of burning over one million acres of sensitive public land to native species and the earth’s environment in general, an Environmental Assessment needs to be completed as to the Proposed Action and a requirement that subsequent Environmental Assessments, for each 40,000 unit prescribed burn, be included in the Proposed Action.

Thank you, for your consideration of my comments.

Doug Hunter

Teasdale, Utah