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Comments: Comments on the Fishlake National Forest Proposed Forest-Wide Prescribed Fire Restoration Project (Project #59899, May 2021)

Thank you for the opportunity to comment on the proposed Fishlake National Forest (FLNF) Prescribed Fire Restoration Project (Project #59899). These comments are submitted on behalf of the Utah Anglers Coalition (UAC), an affiliation of many different angler groups and fishing industry representatives in the state of Utah. The UAC has been organized for more than 15 years, and represents a broad array of angler interests in the State. Anglers constitute a large constituency group in Utah as evidenced by the nearly 950,000 current fishing license holders.

While the UAC supports the use of targeted prescribed fire to manage forest lands and promote the health and diversity of terrestrial vegetation on public lands, we do have concerns regarding the size and breadth of the proposal, as well as its potential to severely and irreversibly damage aquatic ecosystems occupied by both native and sport fish populations. The burning of 1.0 million acres over a period of several years, and up to 40,000 acres a year seems to be overly ambitious. Burns of this magnitude and frequency on the Forest may reach a scale of uncharacteristic wildfire, and increase the relative risk of unwanted effects. The results of 100+ years of fire suppression cannot be reversed in such a short period of time.

The negative effects of fire on stream stability and habitat quality are well documented. We need to look no further than the 2010 Twitchell Fire on the FLNF, which caused extensive damage to Fish Creek, Clear Creek, North Creek, Shingle Creek, and other streams. In some cases, entire fish populations were lost (including Bonneville cutthroat populations) as the result of sediment and ash flows, severe head cutting, blown-out banks, loss of habitat complexity, etc.

Our group is particularly concerned about the potential impacts of fire-induced erosion and consequent sedimentation of small lakes and reservoirs on the FLNF. Sedimentation in these shallow mountain lakes could result in irreversible damage to the fisheries contained therein. Accumulation of sediment could lead to frequent winterkill and total loss of fishery potential. The Boulder Mountain lakes, in particular, provide a popular and unique mountain lake fishing experience for trophy sized brook and native cutthroat trout. These small lakes are highly prized by many of Utah's anglers and should be protected from fire impacts.

Please consider the following actions/recommendations to reduce impacts to aquatic resources:

1. Avoid large scale burning in any one drainage or sub-basin to reduce stream habitat damage and sedimentation of lakes. Consider low intensity, small burn area fires in watersheds containing high value aquatic resources.
2. Pre-treatment mitigating actions and burn preparation may be required to reduce the threat to high value aquatic habitats.
3. Specific actions should be taken for all fires to reduce the short-term impacts of ash and sediment flows on fish populations (lakes and streams), and to prevent the long term impacts of sedimentation of lakes.
4. Include Forest Service (FS) fisheries biologists on interdisciplinary teams of resource specialists set up to prepare the hazard classification and landscape prioritization plans for the prescribed burns. FS fisheries professionals should also be involved in the formulation of burn plans, identification of critical habitats, baseline sampling, fire response, and post-fire monitoring.
5. Consultation with Utah Division of Wildlife Resources fisheries biologists should also be undertaken.
6. Aquatic habitats should be given the same priority as terrestrial habitats in restoration efforts. The FS should establish goals for aquatic habitats in burn areas to promote protection and recovery. Funding should be set aside for habitat restoration to address the inevitable impacts to aquatic habitats.
7. Native fish habitats and wild brood stock waters such as Manning Meadow Reservoir should receive appropriate emphasis and full protection in fire planning.