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Comments: May 14, 2021

Michael T. Elson

Forest Supervisor

Fishlake National Forest

115 East 900 North

Richfield, UT 84701

Submitted via electronically at <https://cara.ecosystem-management.org/Public/CommentInput?project=59899>

Subject: Forest-Wide Prescribed Fire Restoration Project

Dear Mr. Elson:

The Wilderness Society appreciates the opportunity to comment on the Proposed Action for the Fishlake National Forest's Forest-Wide Prescribed Fire Restoration Project. We are primarily interested in this project because it would affect many thousands of acres of Inventoried Roadless Areas that are subject to requirements of the Roadless Area Conservation Rule.

We are concerned that the Proposed Action does not recognize the existence of IRAs within the project area or provide any assurance that the project will comply with the Roadless Rule. While prescribed burning is allowed in IRAs - and in many cases is ecologically beneficial -- any associated road construction or reconstruction or logging activity should be carefully evaluated for consistency with the Roadless Rule, including its exceptions.

The Proposed Action appears to allude to the potential for Roadless Rule conflicts on page 5, where it states:

"It is important to note that this proposed action does not include the use of timber harvesting systems. In areas where specialists determine that fuel loading and/or stand structure is such that prescribed fire behavior might exceed acceptable thresholds and pose risk to prescriptive objectives and/or HRVAs, prescribed fire alone may not be the best treatment. In these situations, pre-treatment using timber harvest could be planned under a separate NEPA process and decision."

One might interpret this statement to be an implied recognition by the agency of the need to comply with the Roadless Rule, but the actual meaning is far from clear. We request that the environmental assessment include a more specific discussion of the project's relationship to the Roadless Rule, along with a thorough description of the project's effects on the ecological and social values of IRAs.

Thank you for considering our comments.

Sincerely,

Josh Hicks

Senior Campaign Manager

The Wilderness Society

Mike Anderson

Senior Policy Analyst

The Wilderness Society