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Comments: On behalf of the Center for Biological Diversity (the Center), and its more than one million members and online activists, thank you for the opportunity to comment on the North Routt Fuels Reduction Project. The Center is dedicated to protecting and restoring imperiled species and natural ecosystems. The Center uses science, policy, and law to advocate for the conservation and recovery of species on the brink of extinction and the habitats they need to survive. The Center has and continues to actively advocate for increased protections for species and their habitats across the Rocky Mountain West, including Utah.

The Center adopts and incorporates by reference the comments of Grand Canyon Trust et al., dated May 14, 2021, attached hereto. The Center supports returning fire to its natural role in forested ecosystems. However, we are concerned, as the Trust's letter states, with the Forest Service's apparent intent to avoid site-specific NEPA review for the project, relying instead on condition-based management, an approach rejected by the U.S. District Court in Alaska. We are also concerned that the Forest Service neglected to disclose to the public that the majority of the area proposed for treatment appears overlap inventoried roadless areas. We strongly encourage the Forest Service in future NEPA compliance to disclose the potential project impacts on inventoried roadless areas and to ensure compliance with the Roadless Area Conservation Rule.

Thank you for your attention to this matter. We look forward to reviewing any subsequently prepared NEPA document. Please place us on your mailing list for this project.