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Comments: I am dismayed that you are trying to use a single Environmental Assessment (EA) for your Dixie National Forest Prescribed Fire Landscape Resiliency Project that will potentially impact >90% the Dixie National Forest (1.477 million burnable acres of the 1.631 million acres), pretty much the entirety of three high plateau mountain ranges and the Pine Mountains of SW Utah. With an estimated 500,000 acres to be burned over the next 10 years, your EA is entirely inadequate. A full-fledged Environmental Impact Statement should be required on a provide having this level of significance, impacting almost the entire Dixie National Forest! This carte blanche approach is like asking for a blank signed check without any potential for oversight and to be paid out over the next ten years.

I can see how it would reduce your workload by having one all-encompassing EA. Another advantage - if you have a fire go out of control, it could pretty much burn the entire Dixie NF and still not go behind prescription. But this approach does not serve interested citizens, especially those of us who live near the Dixie National Forest and worry about wildfire and its impact on our watersheds, livelihoods, wildlife, and recreation.

As instructed, I tried to find your environmental assessment document at <https://www.fs.usda.gov/project/?project=60970>, but it was not listed anywhere that I could find (I spent an unreasonable amount of time looking beneath every headings). The only document with a November date was your 3-page announcement. Frustrated, I instead examined your scoping document dated October 2021, but don't know if it has all the data that I would have expected to see in your EA. Please send me an appropriate link to examine this draft EA (if it is more substantive than the scoping document, then I would ask for additional time for review and to make additional comments).

I had hoped to find maps that showed your overall plan with a mosaic of burn areas labeled by year, something that demonstrated the benefits of using wildfire to create a landscape with a succession of burn areas that would serve as natural fire breaks to stop the growth of enormous wildfires. Why else would you have such an overarching EA? Without such maps, it is impossible to begin to assess the impact of such an ambitious project over such a huge area.

If your goal is to burn ~50,000 acres per year, then I recommend developing a series of annual EAs, each providing detailed mapping of the proposed burn areas showing distribution of vegetation types, fuels loads, natural fire breaks, and other parameters, and specific plans for the burn and subsequent revegetation. By having two or three EIS documents working their way through the system, you would still be able to have a burn every year while allowing the public an opportunity to comment on the specifics of each proposal. This approach would become easier with time, especially after you establish a track record of successful prescribed burns that help to demonstrate how burn areas can be used to reduce the magnitude of future wildfires, and improve wildlife habitat, grazing conditions, and watershed conditions.

I am subscribed to Dixie National Forests notification list for projects requiring public review. In October 2021, you contacted me regarding scoping for the Hungry Creek Vegetation Improvement Project - involving about 100,000 acres (I think it would be better to have smaller burn areas spread out over all of Boulder Mountain). This is the sort of EA that I would expect to see for future prescribed burns. Knowing the scope, nature and timing of your plans allows those of us who are familiar with Boulder Mountain to provide useful insights to the Dixie NF, a major reason that environmental impact analyses require public review. It also allows forest users (ranchers, guides, other permittees, and recreationists) and neighbors who rely on Dixie National Forest as our watershed to know what is coming our way.

Of particular importance is re-vegetating the burn area with native vegetation and making sure to eradicate any invasive species that crop up. I was discouraged to see an incursion of tumbleweed (Russian Thistle) in relatively small, prescribed burn areas on Pretty Tree Bench near Boulder. In response to climate change (higher temperatures and evapotranspiration), planting overlapping biomes might be a good experiment. For example, planting both Ponderosa pine and aspen at higher elevations than where this transitional community presently occurs.

My dad (Gordon Watts) and grandfather (Lyle Watts was USFS Chief in the 1940's and even put the hat on Smoky Bear) both enjoyed careers with the US Forest Service, so I especially appreciate the challenges of managing our forest lands for multiple use. During a couple summers while in college, I worked as a fire fighter at the National Interagency Fire Center in Boise, Idaho. I know that wildfire is essential to the health of the forests of the Intermountain West.

Given the unprecedented long-term drought that has challenged SW Utah, our forests are stressed and especially vulnerable to wildfire. However, I am heartened with how aspen forests on Boulder Mountain regenerate after forest fires. Evolution has given Ponderosa pines thick bark as fire protection - I love open grassy meadows that form beneath stands of these magnificent trees after wildfire.

My dad told me the scariest part of his job as a Forest Ranger was starting a controlled burn, knowing that a change in the weather could easily blow thing up causing it to go out of control. I recall a huge wildfire on the Sevier Plateau near the turn of the century that was said to have resulted from fire crews starting a controlled burn during an unusual period of Code-Red fire conditions in early June. Even if you have completed years of planning, have your budget in hand, and crews on the ground; then don't even strike a match until the weather forecast is favorable. Given the hot dry springs and summers lately, it is likely that fuel and weather conditions will not be compatible to doing prescribed burns during some years.

In closing, the present EA lacks the necessary depth and breadth to truly be considered a valid planning document. For a project affecting the entire Dixie National Forest, you need to do a full-fledged EIS. I would expect to see rational overview plans for each forest district, including maps that illustrate the mosaic of burn areas you plan to create over this 10-year project to restore forest resiliency. Thanks for the opportunity to comment on this important project