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Comments: As I have been reading through the Dixie National Forest Prescribed Fire Landscape Resiliency Project, I have been trying to figure out the purpose of this EA. We all know that fire has the ability to cause significant impacts on the human environment and that it must be managed for site specific concerns in order to ensure it does not cause a significant impact. However, this EA doesn't address any site specific concerns because it is a landscape look at prescribed fire.

So I am racking my brain to understand the purpose of a NEPA document that doesn't address actual environmental concerns and doesn't authorize any site specific actions. Then it dawned on me - the purpose of this EA is to give the Forest Service cover so that when a wildfire occurs on the landscape, the Forest Service can "manage" the fire for beneficial use. This EA is being used to circumvent the requirement to prepare an EIS to address the massive damage created by a wildfire.

In the normal world, all federal actions require NEPA review before authorization, but suppression activities for wildfires are often considered by the Forest Service to be exempt from NEPA because they are deemed "emergencies".

The Forest Service fire program often considers NEPA and other environmental compliance to be too costly and time consuming for their likes, so it appears that the Forest Service has come up with a plan to circumvent environmental compliance. The plan appears to involve a broad and simplistic NEPA Environmental Review for prescribed fire across the whole Forest so they can claim that "NEPA is done" when a wildfire occurs. The Forest Service assumes they will be able to manage a natural wildfire when it occurs because they will claim that NEPA has been completed for the area affected by the wildfire. The Forest Service seems to have come up with a plan to use this EA to avoid having to complete more in-depth and site specific environmental reviews.

This plan is a blatant violation of NEPA, and ESA, and NHPA, and Clean Water Act, and other laws and regulations. Each of these laws have environmental review processes that are required before the Forest Service can authorize the activity. But the Forest Service Fire Program is hoping to circumvent all these environmental review processes by creating a seemingly innocuous Environmental Assessment for prescribed fire that will then be used to justify managing wildfires without actually completing important environmental reviews.

Endangered species, archaeological sites, historic cabins, and watershed are important resources on Forest Service lands and the process to protect them takes time and addresses specific concerns in the areas of proposed prescribed fires. This EA does not include sufficient information to ensure these resources are not damaged and to ensure the project will not have a significant impact on the human environment.

The Environmental review needs to either discuss site specific impacts across the entire Forest to ensure there is not significant impact or the review needs to be in the format of an Environmental Impact Statement to disclose the types of impacts that are anticipated.

Wildfire will absolutely cause a significant impact on the human environment when it is managed as a massive landscape scale as proposed by this Environmental Assessment (EA). The Dixie National Forest must prepare an Environmental Impact Statement (EIS) to address the impacts of Forest prescribed fires planned across the entire Forest.

Sincerely, Utah Concerned Citizens Holding the Federal Government Accountable to their own Laws and Regulations