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Comments: To whom it may concern, in regards to the proposal to implement prescribed burning in designated wilderness areas: as a forester familiar with the issues surrounding forest health and wildfire in the dry forests of the western US I am opposed to intensive management of wilderness areas, including the use of prescribed fire within designated wilderness. While fire is a natural process which can provide important ecological benefits to ecosystems, prescribed burning, as it is typically deployed, is a human cultural practice that is incompatible with the both the intent of wilderness and the laws regulating designated wilderness areas. Prescribed burning typically requires fire lines to be built and is an intensive management practice that leaves a profound human imprint on the land making it incompatible with the laws of wilderness designation as well as incompatible with the intent of wilderness designation.

It is incorrect to assume that prescribed fire will in all cases be beneficial to ecosystems. Prescribed fire is often used in the spring which is out of the natural season for fire which may negatively impact plants and animals that are not adapted to fire in the spring. Prescribed fire can also burn at high severity or escape which may harm sensitive ecosystems and human values.

It is also incorrect to assume that prescribed fire will solve the problem of severe wildfires that impact human safety and economic values because the benefits of fire are relatively short lived. That is, while fire will reduce fuels, it will grow back and often in the form of increased early seral plant communities (shrubs and small trees) which are more prone to severe fire than larger trees. By implementing prescribed fire we are then required to continue to burn every 5 to 10 years to maintain the desired condition and to avoid worse conditions. Such a burning regime is unlikely to be economically or practically feasible.

As a forester, I recognize and embrace the use of fire as a management tool, in the same way that chainsaws and yarders are useful tools in achieving management objectives, but these tools are not supposed to be used in wilderness areas. I support the careful use of prescribed fire to achieve management objectives outside of wilderness or other areas incompatible with intensive management while we hone our abilities to use it in appropriate places and times.

Thank you for working to manage our public lands for the benefit of healthy ecosystems and society.

Respectfully,

Pat Uhtoff

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