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Comments: The Forest Service proposes to burn up to 24,014 acres annually across the Manti-La Sal National Forest for 10-15 years under an emergency authority that bypasses full environmental impact statement review. The most glaring weakness in this Environmental Assessment is that the agency's own GIS data disclaimer explicitly disclaims warranty for the accuracy and reliability of the LANDFIRE vegetation departure data used to calculate the 24,014-acre annual target, yet no independent verification or sensitivity analysis is provided to show this figure is defensible.

Beyond this foundational problem, the document exhibits several additional analytical gaps. The emergency determination is asserted without justification for why a 6-12 month delay for EIS preparation would cause irretrievable harm. The air quality impacts from burning 24,014 acres annually are acknowledged but never quantified or modeled against National Ambient Air Quality Standards, despite the agency's own finding that 'wildfire smoke is a major pollution source in Utah.' The soil recovery timeline of 2-5 years contradicts a 10-15 year authorization window without analysis of cumulative impacts from repeated burning. The Section 106 cultural resource compliance process will require 1-5 years per burn phase, yet the decision authorizes treatments forest-wide-creating an unresolved conflict between legal compliance and implementation schedule. Finally, the Condition-Based Management framework reserves the selection of specific burn locations to the implementation phase, deferring NEPA decisions to after approval.

The Manti-La Sal National Forest matters to me. It is my goal to one day visit every National Park and National Forest on the register, and if they disappear, I cannot complete my goal. What matters most: the history, the environment, everything that has to do with the parks!. If this goes through, this land contains habitats for the Mexican spotted owl, which is protected. Should this plan go through, despite the fact that it is illegal to burn within "half a mile of Mexican spotted owl protected activity centers," there are going to be spotted owls that do not settle within these aforementioned "centers." They are wild animals, and they deserve to live out their lives the way God intended them to. If you remove their habitat, the owls will die out, and that will be another species that the Americans have brought to a complete extinction.

The public should demand that the agency either prepare an EIS with full alternatives analysis, commission independent verification of the LANDFIRE departure calculations, conduct quantitative air and soil impact modeling, and establish site-specific burn locations and selection criteria in advance of implementation, or extend the comment period to allow meaningful review of the post-decision phased approach to Section 106 compliance.