Utah Environmental Congress

MAR 1 3 2003

March 10, 2003

Fishlake National Forest
Attention: Diane Freeman
115 East 900 North
Richfield, UT 84701

Dear Ms. Freeman,

The Utah Environmental Congress (UEC) appreciates this opportunity to comment on the proposed Pahvant Interagency Fuels Reduction Project. We request you keep our organization on the mailing list to receive additional NEPA documents as they become available to the public.

The UEC generally supports the return of fire to the ecosystem. We believe, if done properly, prescribed burns can be a useful management tool that aids the restoration of ecosystems altered by decades of fire suppression, overgrazing, and other management practices. However, we urge the Forest Service to consider the larger picture in planning treatments across the Pahvant Range.

The Pahvant Range has historically received considerable grazing pressure. We believe years of experience and research both demonstrate livestock grazing alters both the fire regime and abundance of woody debris across a forest landscape, contributing significantly to the problem the Pahvant Interagency Fuels Reduction Project is at least in part intended to solve.

In a 1995 paper prepared for the Forest Service by a group of biologists, forest ecologists and other specialists, the authors urged the Forest Service to begin looking beyond the often simplistic management approaches designed by the agency to address complex problems created by generations of mismanagement. While the paper focuses upon the Columbia and upper Missouri basins, it has clear implications for forest ecosystems across the western United States.

> *Land management practices in the interior Columbia and upper Missouri basins have profoundly impacted forest, grassland, and aquatic ecosystems. Watersheds and forests have been degraded (e.g. ecosystems fragmented, habitats simplified or lost, disturbance regimes altered). At every level of biological organization –*

1817 S. Main Street; Ste. 10 • Salt Lake City, UT 84115
Ph (801) 466-4055 • Fax (801) 466-4057
www.uec-utah.org

within populations, within assemblages, within species, and across the landscape – the integrity of biological systems has been severely degraded. This degradation is best seen in the marked reduction in the biological diversity in the region.

The entire range of land management practices is implicated in this regionwide decline. *Streamside development, logging, grazing, mining, fire suppression, removal of beaver and large predators, water withdrawals, introduction of exotic species, and chronic effects of roadbuilding have cumulatively altered landscapes to the point where local extirpation f sensitive species is widespread and likely to continue. Areas dominated by healthy populations of native species of vertebrates are exceptional. Many of these changes began long before the establishment of wilderness areas and other protections, and therefore, the majority of the region has been impacted. (Wildfires and Salvage Logging, Bescheta, et al., March 1995, Emphasis added)*

The need for the proposed Pahvant Interagency Fuels Reduction Project is described within the scoping letter as reduction of "probability of catastrophic wildfire and secondary effects, such as flooding, along the Pahvant Front Range near the wildland/urban interface communities of Scipio, Holden, Fillmore, and Meadow. To this end, the proposed action is to reduce hazardous fuels by reducing fuel height and fuel loads." (Scoping Letter, Feb. 13, 2003)

We recognize the ability of the proposed action to meet this purpose and need over the short-term, but believe continuing historic management practices across the larger landscape will only continue to degrade the ecosystem, alter fire regimes beyond historic patterns, and increase fuel loads. Therefore, we request the Forest Service consider at least one additional alternative which recognizes the role of historic management practices (i.e. livestock grazing) in the creation of the conditions this proposal is meant to resolve.

We believe the Forest Service and BLM together have an excellent opportunity to affect both short-term and long-term change that will reduce the immediate threat to communities along the Pahvant Front Range, while enhancing the long-term recovery and associated long-term risk to communities by reducing or eliminating management practices that have facilitated woody fuel buildup, pinyon-juniper encroachment, and altered fire regimes. Because the purpose of this proposal is fuels reduction, we believe activities such as public lands grazing which have been implicated by researchers inside and outside of the agency in the buildup of fuels across both Forest Service and BLM lands, are within the scope of the proposed action. An alternative dealing with the role of livestock grazing is therefore worthy of consideration in this case.

The UEC is also concerned about possible impacts to the roadless areas of the Pahvant Range. Of particular concern are the Horse Hollow, Meadow, Pioneer, and Wild Goose treatment units which the scoping letter states all contain portions of inventoried roadless areas. We agree with the Forest Service impacts to these roadless areas need to

be addressed within any environmental analysis prepared for this project. However, the UEC is concerned by the implication of statements within the scoping letter that prescribed burning may alter "Roadless characteristics" within the IRAs in the project area.

We agree that fire, wherever or however it occurs, does alter the structure and nature of forest or rangeland ecosystems. However, because fire typically naturally occurs in these ecosystems, we do not believe replicating these effects through prescribed burns should be considered an alteration that in any way jeopardizes or changes either the roadless or potential wilderness character of an area. This is especially true if mechanical treatment is minimal to non-existent and new permanent or temporary roads are not a part of the proposed action.

The UEC urges the Forest Service and BLM to fully disclose the impacts of actions taking place across the treatement units, including those portions considered inventoried roadless areas. However, we request neither agency consider prescribed burning an alteration which triggers any change in the character of these areas. Toward this end, only prescribed burning should be employed in IRAs and both the Forest Service and BLM should make every effort to avoid unnecessary mechanical treatment in these areas. Road construction of any kind should also be avoided. If these conditions are met, there is no reason the roadless or wilderness character of any of the IRAs impacted by this action should be altered in any way.

The UEC is also concerned about the impact to management indicator species (MIS) and threatened, endangered, proposed and sensitive (TEPS) species which are or may occur within all or any part of the proposed treatment units. Sensitive plants of concern include:

- Mound cryptanth (*Cryptantha compacta*)
- Barneby woody aster (*Aster kingii var. barnebyana*)
- Nevada willowherb (*Epilobium nevadense*)
- Warner Dodder (*Cuscuta warneri*)
- Neese narrowleaf penstemon (*Penstemon angustifolius var. dulcis*)
- Goldenrod snakeweed (*Gutierrezia petradoria*)
- Ward beardtongue (*Penstemon wardii*)
- Low beardtongue or Dwarf penstemon (*Penstemon nanus*)
- Jones globemallow (*(Sphaeralcea caespitsoa*)
- Great Basin fishhook cactus (*Sclerocactus pubispinus*)

Among vertebrate species of concern within the area or potentially within area are Northern goshawk, boreal owl, flammulated owl, Bonneville cutthroat trout, boreal toad, sage grouse, mule deer, Rocky Mountain elk, mountain lion, bobcat, three-toed woodpecker, and a host of neotropical migratory birds protected under the MBTA. Impacts to all of these should be carefully evaluated within the EA's cumulative effects analysis and monitoring data, including population status and trend for the various MIS,

should be disclosed with references documenting the monitoring data within the bibliography of the EA.

While long-term, the benefits of the proposed action to many of the species discussed above may be significant, especially if continued livestock grazing in the area is dealt with, the existence of beneficial effects does not relieve the Forest Service or BLM of disclosing the cumulative effects to these resources. Mitigation should be provided to maximize the likelihood of recovery in the burned areas, especially in light of past and continuing drought conditions. Again, this mitigation should include long-term or permanent relief from grazing pressure, at least under one of the action alternatives considered.

Any burning done as part of project implementation should occur in the spring or fall when cooler and moister conditions are prevalent. Again, in light of ongoing drought, this is especially important as fuels are already considerably drier than under normal conditions. We urge any of the lessons learned through post fire analysis on the Powell District of the Dixie National Forest with regard to the Stanford Fire be incorporated into your prescribed fire plans in this case.

Thank you again for this opportunity to comment. The UEC looks forward to reviewing the draft EA and accompanying response to our concerns upon release to the public.

Sincerely,

Craig Axford

Craig Axford
Program Director, UEC