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Comments: The state of Utah (State) has reviewed the Prescribed Fire Landscape Resiliency Project scoping and recognizes prescribed fire as an important tool for increasing the quality of critical wildlife habitats and watersheds. The State supports the project. The project will benefit the landscape by reducing conifer encroachment, stimulating mountain browse regeneration and lowering the likelihood of catastrophic wildfire by reducing fuel loads. In collaboration with the Utah Division of Wildlife Resources (DWR), the State offers the following scoping comments for your consideration.

This proposed project includes portions of four of the DWR's wildlife management units (WMUs) and portions of the Parker Mountain Emery and Panguitch Sage-grouse Management Areas (SGMA). There are 500 miles of fishable streams and lakes within Dixie National Forest, some of which are Blue Ribbon Fisheries. Coordination between the Forest Service and DWR to develop mitigation strategies, such as timing and size of site-specific burn units, prior to project implementation can help minimize impacts to sport fisheries and big game summer range.

Terrestrial Considerations

The prescribed fire will help improve crucial summer range conditions through the immediate growth of forbs, grasses, and future aspen regeneration. The project meets numerous objectives outlined in DWR's deer management unit level plans including the items listed below:

- * Cooperate with federal land management agencies and private landowners in carrying out aspen regeneration and habitat improvement project.
- * Seek cooperative projects to improve the quality and quantity of deer habitat to support herd objectives.
- * Maintain and/or enhance forage production through direct range improvements throughout the unit on winter and summer range to achieve population management objectives.
- * Maintain critical fawning and fawn rearing habitats in good condition.

The DWR maintains the Utah Natural Heritage Database, which curates data and observations for species of conservation concern and those listed as threatened and/or endangered under the Endangered Species Act. The DWR recommends an official species occurrence analysis be requested for the project records and those species considered in the EA analysis. The Natural Heritage Database can be accessed here:

https://dwrcdc.nr.utah.gov/ucdc/ContactUDWR/Information_Requests.htm

Other species DWR recommends including in the EA include band-tailed pigeon, pika, pygmy rabbit, bat species, and woodpeckers. Impacts to small forest mammals, which are prey for the northern goshawk and Mexican spotted owl, could also be noted in the analysis.

Aquatic Considerations

Mitigating impacts to the aquatic resources in the area requires balancing the prescribed fire's benefits to watershed health and implementing strategies to manage increased sedimentation and localized fish losses. To help address this, DWR asks that the Forest Service consider adopting design features the Fishlake National

Forest identified for future prescribed fires such as, burning no more than 20 percent of the sub-basin habitat. It is important to note that there is a range-wide conservation agreement and strategy for Bonneville cutthroat trout developed in partnership with state and federal stakeholders. Monitoring and evaluation of early-stage treatments by fisheries biologists may help identify potential issues early.

DWR personnel are committed to working with the Forest Service to assist in any aspect of this project. The steps outlined in the project's implementation checklist are a great way to approach inter-agency coordination. DWR offers its biologists to assist on the designated resource specialist team. DWR appreciates the opportunity to collaborate to help achieve desired outcomes and allow site-specific plans to be developed as a team.

DWR looks forward to working with the Forest Service through the planning and implementation of this project. If you have questions please contact Jessica Kinross, Impact Analysis Biologist at DWR's Southern Region Office, at 435-691-2372.

The State looks forward to continually working with the Forest Service to further improve public lands in Utah. Please direct any written correspondence to the Public Lands Policy Coordinating Office at the address below or call to discuss any questions or concerns.