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Title: Chairman

Comments: Iron County appreciates the opportunity to provide input on scoping of the Prescribed Fire landscape project. The 2017 Brian Head Fire is a testament to the need for fuels reduction projects to help prevent such catastrophic fires. We applaud the Forest Service's forward preparation to reduce threats to the communities, watersheds, grazing, and general forest health; and believe that use of prescribed fire can be an effective tool that seems to have been underutilized for decades. The project is in-line with the Iron County Resource Management Plan - 2017, Fire Management, Issue 3.

The scoping document seems pretty thorough and includes most areas of concern, however, there are some issues that the Iron County Commission would like to see addressed as follows:

1. Page 2, Desired Conditions, 4th bullet of Goal

This bullet indicates the intent to assign "scenic integrity" objectives to any parcels that are currently unassigned to scenery, and refers to Appendix A.

- There is no discussion in the Desired Condition section or Appendix A as to what and why a scenery objective assignment is needed and what value it offers to the project.

- There is no discussion as to what elements or criteria were used to assign scenic integrity objectives to the proposed parcels of land to be treated.

2. Page 50, Map of scenic integrity objective assignment.

- Area D2-2. We would suggest this area be expanded north to include the west side of Cottonwood Mountain. This is a crucial deer wintering range that received vegetation treatment over 30 years ago and is becoming overgrown with pinyon/juniper. Prescribed fire could be used to maintain and rejuvenate the vegetation treatment area.

- Area near D2-17. Hancock Peak (not identified as a treatment area_ has been the focus of numerous discussions for the need of management to prevent a major catastrophic fire event. The volcanic topography prevents most treatments types and prescribed fire seems to be the only feasible tool available. Iron County suggests the FS consider the Hancock Peak area for prescribed fire management under this proposal and at least offer a discussion.

3. Checklist, page 39, 1(b) External consultation and collaboration. The Iron County Commissioners would like the be included as one that is consulted with prior to prescribed fire projects being implemented. This is in line with NMFA guidance regarding coordination with state and local governments and is a key part of the Iron County Resource Management Plan 2017, and the State of Utah Resource Management Plan 2018.