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Organization: Garfield County Commissioner

Title: Commissioner

Comments: We appreciate the opportunity and invitation to comment on the proposed Prescribed Fire Landscape Resiliency Project. As we have reviewed the project, we feel that the overall goals and objectives of the project align with our respective resource management plans. We understand and agree that artificial suppression of fire during the past century combined with multiple decades of passive federal land management have changed plant communities and resulted in conditions that are not resistant or resilient to wildfire.

We also understand the need to conduct a large-scale environmental assessment (EA) to consider impacts for conducting prescribed burning for the majority of the Forest. This will save time and money for the Forest Service and allow you the flexibility to conduct prescribed fire operations when conditions are right. We appreciate that you are taking an active role in the management of the Forest and recognize the overall benefit of the project.

With that, we do have a few concerns. First of all, we don't want this assessment to override the need to communicate and coordinate with local governments and communities. As described in your EA, prescribed fire does have impacts on air quality and visibility. In Southern Utah, we are highly dependent on tourism which for a large part is based on our clean air and beautiful views. Our policy is that anyone conducting prescribed fire operations consult closely with the counties and local municipalities to ensure that air quality and visibility issues are mitigated.

Second, we are interested in protecting the interests of our livestock community. Aside from tourism, another major portion of our economy comes from agriculture and grazing. We understand that prescribed fire on an allotment can result in temporary displacement of livestock, temporary suspension of head months, and increased management. One specific issue we noticed was that under the heading "Post-treatment Actions," a bullet point states "Resting burned or treated areas from livestock grazing for two full growing seasons (spring through fall)." We understand that this might be a requirement in some cases but, in many cases, allotments do not need to be rested at all or for a shorter period. We request that this language be modified to include greater flexibility.

In our review, we noticed that the analysis lacked any solution for damages to livestock fencing, pipelines, or other improvements. It did state that these improvements would be identified and efforts would be made to protect them. However, we all know that prescribed fire can and frequently does move beyond the intended areas and has, in the past, resulted in damages to livestock improvements. We request that funding for potential damages be included as an element to the burn plan and that the Forest Service take responsibility for the replacement of the damaged improvements.

While we understand that most of these impacts to grazing are temporary, the cost of those impacts could be such that an allotment owner could go out of business. It is critical that the Forest Service coordinates closely with the allotment owner to ensure that these impacts are timed appropriately as to not cause undue hardship.

Third, we encourage close coordination with the Utah Division of Wildlife resources to monitor big game species during post treatment. We have noticed rising damages to soils, vegetation, and riparian areas due to the increased elk numbers. Due to the increased vegetative response of the burned treatment, it may attract elk and other big game to new areas or in numbers not previously seen. This can result in damages to soils and vegetation as well as cause conflicts with livestock grazing. While we understand that authority for the management of wildlife rests solely with the State of Utah (State), the management of vegetation and soils resources rests with the Forest Service. If elk or other wildlife are causing harm which would defeat the purposes of the goals identified within the burn plan, the Forest Service should petition the State to address the wildlife

issue.

Fourth, we are concerned that, at the completion of this analysis, wildfire may be used as a tool for treatment when other tools may be more appropriate. It is our policy that prescribed fire is used as part of an integrated approach after mechanical, chemical, grazing, and vegetative harvesting techniques have been appropriately implemented. Due to the impacts of air quality and visibility, we would like to ensure that other methods of treatment are implemented where feasible. We also strongly encourage the use of commercial logging, thinning, and commercial firewood harvest in areas with marketable timber. As technology and demands change, areas that were once considered undesirable for commercial operations may have become desirable. We encourage involving local timber producers in the planning effort to ensure marketable timber is not wasted or underutilized. We are adamantly against the use of prescribed fire in an area where another treatment feasibly exists and encourage the Forest Service to actively plan and implement alternative vegetation treatments.

Last, we do ask for continued coordination during prescribed fire planning. We noticed a checklist was included to individually analyze each prescribed fire operation. This checklist helps address some of the concerns we have listed. We would like you to modify the checklist to require a review with the Counties. This would ensure that we are informed of each individual operation, ensure our concerns are addressed, and allow us to provide crucial information to the planners.

Along with this, we noticed that in section 1.b.iv. of the checklist, there is a requirement for coordination with the Nature Conservancy prior to implementation. We find this highly concerning. We do not support coordination with any non-governmental organizations or special interest groups in the implementation of projects. They may comment publicly, but only state and local governments are allowed coordination status as they have been elected by the public. We request that the requirement to coordinate with the Nature Conservancy be eliminated from the checklist.

Thank you for taking the time to read and understand our concerns. Again, we appreciate your willingness to take an active role in the management of our public forests. We are very supportive of prescribed fire when used at the appropriate time, location, and in close coordination with local stakeholders. We hope that our comments are helpful and that we can continue to coordinate with each other in the best interest of the public. While the following counties share these concerns as supported with our signatures, we do reserve the right to make separate and additional comments on this project.

Please feel free to contact us at any time if you have any questions.