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Comments: The state of Utah (State) through the Public Lands Policy Coordinating Office has reviewed the Dixie National Forest's Environmental Assessment (EA) for the Dixie National Forest Prescribed Fire Landscape Resiliency Project. The State supports the project. The proposed prescribed fire project will help improve the health of public lands, create effective wildfire fuel breaks, and contribute to rangeland sustainability. Using prescribed fire treatments to mitigate wildfire effects will improve native vegetative communities, thus allowing greater livestock distribution within grazing allotments and potentially larger herds. The State provided scoping comments November 16, 2021 and incorporates those comments by reference. In collaboration with the Utah Department of Agriculture and Food (UDAF), the State submits the following comments for your consideration. The State encourages the Forest Service to promptly implement the proposed project to improve rangeland health and reduce the risk of catastrophic wildfire.

The State appreciates the inclusion of livestock grazing permittees through the process and implementation of the prescribed fire projects. The State also encourages the Forest Service to continue to collaborate with livestock grazing permittees and allow additional head months in other grazing areas in the case of temporary head month reductions. The State recommends the use of desirable non-native species alongside native species during the reseeding process in order to improve forage resiliency, prevent erosion, and combat invasive species establishment.

As stated in the EA, "The proposal would be implemented across the approximate 1.477 million burnable acres of the 1.631 million acres administered by the Dixie National Forest over the next 10 years." This includes the authorization of using prescribed fire on 49,500 acres each year. As prescribed fire projects occur, early coordination with grazing permittees and coordinating prescribed burning with grazing schedules is essential.

Additionally, burned landscapes should be inspected at a site-specific level to determine when livestock grazing is authorized. Not all landscapes need to be rested for a full two growing seasons and some landscapes need to be rested for longer. Having the flexibility to monitor the needs of the landscape on a site-specific level will promote adaptive management and allow for site-specific management approaches to be implemented. The proposed project will be in accordance with the State of Utah Resource Management Plan, which states, "The State promotes fuel breaks, thinning, chaining, prescribed fire and the selection of fire-resistant vegetation in green-stripping and burned areas."

The EA fails to address or put in place a process for repairing or rebuilding the range infrastructure that might be damaged during a prescribed burn. For example, who would be responsible to replace burned or melted water pipes, fences, and corals? Secondary to this concern is the process for re-instated livestock grazing in areas where infrastructure has been damaged. The Forest Service should include rebuilding funds in the pre-fire plan and permittees should not be placed in noncompliance if the range improvements and infrastructures haven't yet been replaced.

The Forest Service should coordinate with the Utah Division of Wildlife resources to monitor use by big game species during post treatment. Increased vegetative response of the burn treatment area may attract native wildlife to new areas, or in numbers not previously seen. If the project is successful in increasing forage production, the Forest Service should work closely with the State, including the Utah Division of Wildlife Resources, to adapt to the potentially increasing use by native wildlife and ensure that the longtime goals of the project are still realized.

Prescribed fire should be used as part of an integrated approach after mechanical, chemical, grazing, and

vegetative harvesting techniques have been appropriately considered and implemented. Due to the impacts of air quality and visibility, Forest Service should ensure that other methods of treatment are implemented where feasible and appropriate. Forest Service should additionally consider 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. Forest Service should coordinate with local timber producers in the planning effort to ensure marketable timber is not wasted or underutilized. Forest Service should avoid the use of prescribed fire in an area where another treatment feasibly exists, and the Forest Service continue to actively plan and implement alternative vegetation treatments.

The proposed checklist in the Appendix requires that the Forest Service reach out to Iron County Commission and the Nature Conservancy. The State appreciates the Forest Service reaching out to local governments and the Forest Service should include Garfield County, Washington County, and Kane County in the proposed checklist. Local county policy is that anyone conducting prescribed fire operations consults closely with the counties and local municipalities to ensure that air quality and visibility issues are mitigated.

The State appreciates the opportunity to provide comment and looks forward to continually working with the Forest Service to improve rangeland health, ensure sustainable multiple uses on public lands, and make proactive decisions to combat catastrophic wildfire damage.

Please contact me if you have any questions.

Footnotes:

1 Bybee, J. Roundy, R.A., Young, K.R., Hulet, A., Round, D.B., Crook, L., Aanderud, Z., Eggett, D.L., Cline, N.L. 2016. Vegetation Response to Pinon and Juniper Tree Shredding. *Rangeland Ecology and Management* 69: 224-234. Available online at https://www.firescience.gov/projects/10-1-01-7/project/10-1-01-7_shred.pdf

2 State of Utah Resource Management Plan. Page 85. Available Online at <https://storymaps.arcgis.com/collections/81d4406668e34acca4d98275ee41cd07?item=1>