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To Whom It May Concern:

We, the Iron County Commission, appreciate the input of experts and professionals in our community who have helped us make local decisions in the best interest of public health and safety.

The Transmission Index, Mask Mandate, and "Stay Safe to Stay Open" initiatives as explained by our Governor on October 13 constitute a dangerous overreach and pose a greater risk to our residents than other less-restrictive measures. Further, many metrics are either unobtainable or otherwise ignore actual assessment of healthcare outcomes, ensuring a continuation of our 14-day "flatten the curve" experiment commenced this spring with no end in sight.

Governor Herbert stated on October 13 that, "We are having one of the worst outbreaks in the country and this is unacceptable." We keep in mind the social costs of any health measure, which in Iron County have resulted in sharp increases in murder, suicide, overdoses, and other crimes against persons. Sadly, we lack official data to assist us in making decisions. While our state tracks daily cases of Covid-19 by county, it is unwilling to provide us with real-time data regarding the other negative effects brought on by shutdowns and uncertainty.

We are concerned about the following aspects of the plan:

7-day average percent positivity: This metric isn't really a measure of disease in the community as much as it is a measure of willingness to test. This policy provides incentive for counties to encourage healthy residents to waste public resources in obtaining testing when exhibiting the slightest symptoms in order to protect their livelihoods from more mandates. Additionally, it punishes the county by discovering more cases that otherwise would have gone undetected. In other words, this metric encourages testing, while the next metric punishes those that test more. Because only 1 in 11 cases of this disease have been detected, there will always be more cases to discover. This metric placed at an unreasonably low level will unnecessarily keep us at high levels of restriction.

14-day case rate per 100K population: This metric considers an area at a "high level of transmission" if more than 325 people per 100,000 residents test positive within a 14-day window and requires fewer than 100 people per 100,000 residents to test positive within a 14-day window to be considered "low transmission." This metric has no basis in saving lives or preserving life, but instead is intentionally designed to be ineffective or unobtainable. For example, the most conservative studies show that a minimum of 25% of residents must become infected for a chance at herd immunity. At an infection rate of 100 people per 100,000 every 14 days, that 25% will take almost 10 years to obtain. Even at the more aggressive 325 people per 100,000 every 14 days, a 25% infection rate would take almost 3 years. The Governor's endorsement of this metric guarantees the unacceptable continued exercise of the heavy hand of government through mandatory vaccines or continued mandates.

To illustrate, Iron County's median daily new case count between June 1 and October 13 was 5 new cases per day. That places our county of 55,000 residents at an infection rate of 127 people per 100,000 every 14 days, which number has remained relatively stable since June 1. The Governor's metric places our county therefore in a "moderate risk" category, even though this caseload over the last 4 months has had a negligible effect on our ICU.

Statewide ICU utilization rates: This statistic punishes our county for people in the ICU anywhere in the State. This metric tells us that an ICU which has patients for any number of reasons can never be full. That aside, our ICU utilization due to Covid-19 is low. Anecdotally (again, Covid-19 metrics are the only numbers we have access to, with no access to other critical factors allowing us to make decisions) our local ICU usage has been from people who have deferred serious preventative care due to shutdowns.

Continued uncertainty and shutdowns have caused an increased burden on our ICU primarily due to deferred preventative care. Paul Cozzens, a member of our commission, could have lost his wife due to an untreated infection when clinics remained shut down and refused to see her. We are grateful that she has not become another shutdown casualty statistic to be released in the coming years.

The best thing we can do to alleviate the burden on our local ICU is to send a clear message that we are open and that we want people to go to work and to see their doctors for all issues, even if not presenting Covid symptoms.

Mask Mandate and Stay Safe to Stay Open: Iron County has a "moderate risk" designation and is therefore subject to the 2-week mask mandate. We especially find it unacceptable to criminalize or otherwise mandate business owners to wear masks. We encourage all businesses to open to the extent they feel comfortable and to provide for their families in the way they feel is best. If strict adherence to an apparent mandate is the best way to provide for their families, then we encourage businesses to do so. If businesses feel that they are able to keep themselves and patrons safe in any other way, we encourage them to do that.

Throughout the course of this summer, Iron County has seen thousands of weekly visitors from states that were shut down. Even with the Shakespeare Festival and Utah Summer Games season

cancellations, our tourism workers were able to provide for their families thanks to these visitors. The destination events included a large outdoor concert with over 4,000 in attendance, Independence Day parade, large team sporting events, our county fair, and any other activity that would attract visitors. With all these events and visitors, we have not seen a resulting damaging spike in cases.

This pandemic has brought on some absurd and dangerous incentives and precedents, from nonessential individuals intentionally contracting Covid-19 to sell blood plasma, to our state's awarding of multi-million dollar no-bid contracts for contact tracing programs and software that remain unused.

We will work with the health department to ensure our plans protect those at highest risk. We recognize that the elderly and those with underlying medical conditions have many times more risk from this disease than those not at risk. We will focus resources to allow for rapid testing that will be available to the entire community. This testing will allow everyone, including those without symptoms, to ensure they have a negative test before interacting with high-risk loved ones. We further support the medical community and recognize that remarkable strides have been made toward improved outcomes for those most impacted by this disease. Finally, as we reach herd immunity through natural exposure or even through safe testing, and voluntary vaccinations, our most vulnerable population will be protected.

We cannot in good conscience continue to hold livelihoods hostage with guaranteed negative effects for fear of exceeding arbitrary transmission standards. Instead, we will continue to encourage safe behaviors in the least restrictive manner while we carefully monitor the spread of Covid-19 and other social ills in our community.

Sincerely,
The Iron County Commission



Paul Cozzens



Alma L. Adams



Michael P. Bleak