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BlueRibbon Coalition (BRC) is writing to provide feedback for the Big Cottonwood Canyon Watershed Restoration Project Environmental Assessment. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of Utah. BRC members visit this area for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Wildfire

The Environmental Assessment clearly demonstrates that Big Cottonwood Canyon has experienced nearly two centuries of fire exclusion resulting in unnaturally dense forest conditions, heavy fuel accumulations, widespread insect and disease impacts, declining aspen

stands, and increasing vulnerability to catastrophic wildfire. The Forest Service has identified substantial mortality associated with Balsam Woolly Adelgid infestations, declining watershed resilience, and conditions that increase the probability of high-severity wildfire throughout the project area. These concerns are well documented in the EA and establish a compelling need for action.

BRC agrees with the Forest Service's conclusion that the no-action alternative would allow hazardous fuel conditions to continue worsening, increasing risks to public safety, recreation infrastructure, wildlife habitat, municipal water supplies, and local communities. The project area contains critical infrastructure, extensive recreation facilities, residential developments, ski resorts, transportation corridors, and watersheds that provide a significant portion of Salt Lake City's culinary water supply. Failure to act places all of these resources at increasing risk from uncharacteristic wildfire.

Habitat loss is the largest threat to wildlife and wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife. However, many conservation groups actively litigate forest projects that help mitigate fires. One of the best things that can be done to protect wildlife and habitat is to actively manage forests to prevent wildfires. In order to adequately manage the forest roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier.

Active Vegetation Management

BRC supports treatment on the full 4,910 acres proposed for mechanical thinning and the full 11,794 acres proposed for prescribed burning. A combination of hand thinning, prescribed fire, aspen restoration, riparian improvements, invasive species treatments, and watershed restoration activities will be most effective. These treatments represent proven forest management tools that restore more natural stand structures, reduce ladder fuels, improve species diversity, and increase resilience to wildfire, insects, disease, and drought. The proposed action appropriately recognizes that fire exclusion has altered natural disturbance regimes and that active management is necessary to restore ecological function and reduce future wildfire severity.

BRC particularly supports the project's emphasis on protecting watershed values. Big Cottonwood Creek provides approximately forty percent of Salt Lake City's culinary water supply, making watershed protection a matter of regional public interest. High-severity wildfire within these watersheds could result in severe sedimentation, flooding, debris flows, degraded

water quality, and costly impacts to municipal water infrastructure. Proactive vegetation management and fuels reduction are among the most effective tools available to reduce those risks before a catastrophic event occurs.

BRC supports active management—including mechanical treatments, manual treatments, prescribed fire, targeted herbicide use, and seeding—as described under the Proposed Action. These tools are necessary to restore more natural vegetation structure, reduce hazardous fuels, improve watershed function, and increase resilience to drought and wildfire.

The EA also recognizes that USFS manages these lands under FLPMA for multiple use and sustained yield. Healthy, functioning landscapes are essential to sustaining recreation, grazing, wildlife habitat, watershed protection, and other multiple uses. Proactive treatments reduce the likelihood of catastrophic wildfire that can close access, damage infrastructure, eliminate forage, and permanently convert ecosystems to invasive-dominated states.

For these reasons, BRC supports approval and implementation of the Proposed Action. Active management is necessary to keep the land healthy, resilient, and capable of supporting multiple use both now and into the future.

We urge the USFS to pursue the most aggressive vegetation treatment options available within this project. Vegetation treatments that reduce wildfire risk and improve forest resilience may temporarily affect visual resources but will have far greater long-term ecological and safety benefits.

The plan states a possible method to use is prescribed burns. If this method is chosen for an area, and a wildfire arises at any point, that wildfire should be treated as such and the Forest Service should not allow the wildfire to burn in order to meet prescribed burn objectives. This involves a lot of risks and wildfires should always be treated with as much urgency to suppress the fire as possible.

Inventoried Roadless Areas

BRC supports the proposed treatments within Inventoried Roadless Areas and agrees that hazardous fuels, insect mortality, and declining forest conditions within these areas pose the same risks to watershed health, recreation, wildlife habitat, and public safety as elsewhere in the project area.

While the proposed treatments appropriately comply with current Roadless Rule requirements, this project is expected to be implemented over approximately ten years, during which forest management policies and regulations may change.

BRC encourages the Forest Service to retain maximum management flexibility throughout project implementation. If future agency direction, regulations, or legislation provide additional authorities for vegetation management within currently designated roadless areas, the Forest Service should be prepared to utilize those tools where they would further reduce wildfire risk, improve forest health, protect watersheds, and enhance long-term ecosystem resilience.

Public Health and Safety

BRC further recognizes the value of the proposed treatments in improving firefighter safety and wildfire response effectiveness. Creating and strengthening defensible spaces and Potential Operational Delineation (POD) features provides firefighters with safer and more effective opportunities to manage future wildfires while reducing suppression costs and risks to personnel. These investments in preparedness are particularly important given the increasing frequency and severity of wildfire seasons throughout the Intermountain West.

The Forest Service should be doing everything in its power to prevent wildfire from arising by approving and moving forward with firescape projects. “It is well documented that exposure to wildfire smoke is associated with adverse respiratory, cardiovascular, and birth outcomes, and premature mortality.”¹

“Over the last three decades, the acreage burned annually by wildfire across the United States has doubled. This trend is driven by western states such as California, which experienced a fivefold increase in annual acreage burned from wildfire over the last half- century (Williams et al., 2019). While wildfires can impact the environment and human health through various pathways (e.g., impaired drinking water, soils, and crops)”²

Recreation

The EA appropriately notes that temporary impacts to recreation may occur during implementation. While short-term closures and operational impacts can be

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https://www.lung.org/getmedia/fd7ff728-56d9-4b33-82eb-abd06f01bc3b/pse_wildfire-and-prescribed-fire-brief_final_2022.pdf

² <https://siepr.stanford.edu/publications/policy-brief/managing-growing-cost-wildfire>

inconvenient, they are minor compared to the long-term recreation losses that would likely result from a large-scale, high-severity wildfire. Catastrophic fires often lead to years of trail closures, infrastructure damage, watershed degradation, hazard tree removal, and reduced recreation opportunities. By reducing wildfire risk now, the proposed action helps preserve future recreational access and experiences for the public.

Applicable Laws, EO's and SO's

Federal policy now emphasizes the expansion of recreation opportunities. The EXPLORE Act requires agencies to expand outdoor recreation—including motorized access—and directs them to plan for growth, not reduction, of recreation use. Any reliance on outdated or rescinded climate directives would be inconsistent with current law and Executive Orders. For this reason, USFS should have analyzed an additional alternative to keep these miles of roads open.

Recent Executive and Secretarial directives strongly reinforce the importance of approving and aggressively implementing landscape-scale fuels treatments like those proposed in this project. Executive Order 14072 (“Strengthening the Nation’s Forests, Communities, and Local Economies”) directs federal land managers to advance climate-resilient forest conditions, prioritize ecological health, and actively reduce wildfire risks through strategic vegetation treatments. It recognizes that high-severity wildfires are a direct threat to ecological integrity, rural communities, and recreation access—mandating that agencies use all available tools to address over-dense stand conditions. These mandates, together with long-standing EO directives on wildfire mitigation, restoration, and infrastructure coordination, affirm that delaying or minimizing necessary fuels treatments is inconsistent with national policy direction.

Complementing these directives, the Department of Agriculture has issued Secretarial Orders that specifically instruct agencies to increase the scale and pace of hazardous-fuels reduction and forest-health interventions. Orders such as USDA Secretarial Order 1077 and follow-on wildfire-crisis initiatives call for “treating more acres, more quickly, and more strategically,” emphasizing cross-boundary projects, expanded mechanical thinning, proactive prescribed fire, and flexible access strategies necessary for effective implementation. These directives make clear that the USFS is expected not only to authorize projects like this one, but also to design them to capture the full extent of treatment opportunities available within the landscape, even when additional access, temporary roads, or inter-unit coordination are required. In short, the governing Executive and Secretarial mandates urge the agency to approve this project and to structure it in a way that maximizes treatment acreage, reduces long-term wildfire risk, and accelerates the transition to healthier, more resilient forest conditions.

BRC supports the proposed Forest Plan amendment necessary to accomplish treatments within Management Prescription 2.6. As the EA explains, excluding these areas from treatment would undermine the project's ability to meet its purpose and need and would leave important portions of the watershed vulnerable to continued decline and uncharacteristic wildfire risk. Given the significant public benefits associated with watershed protection and fuels reduction, the proposed amendment is justified and appropriate.

For these reasons, BlueRibbon Coalition strongly supports Alternative B and encourages the Forest Service to move forward with implementation as

Roads and Infrastructure

BRC supports the maintenance and repair of system roads. We oppose the proposed removal of any roads from the road system. There should be no road decommissioning as a result of this project as this would directly undermine the agency's ability to perform vegetation treatments, conduct fuel reduction, respond to wildfires, and manage recreation. As outlined in numerous USFS analyses, road access is critical for forest and land health, wildfire suppression, and emergency response. Removing access only increases long-term costs and risk.

Conclusion

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV's often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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P.O. Box 5449
Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,

A handwritten signature in black ink, consisting of stylized initials 'BB' followed by a long horizontal line.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to read 'Simone Griffin' in a cursive script.

Simone Griffin
Policy Director
BlueRibbon Coalition