To Whom it May Concern, Feb. 24, 2026

DECLARATION OF DR. PAUL C. ROGERS

Below is my expert response to statements made to justify tree cutting and removal in the Highline Area of the Manti-La Sal National Forest. Please note, I speak here as a private citizen and not for Utah State University. Specific page numbers of my responses to the February 2026 "Skyline Healthy Forests Restoration Act (HFRA) Project (Draft EA)" are referenced below. My publication credentials can be found in the accompanying personal *Curriculum Vitae*.

- (P. 30) **"Increased Fire Risk" is a common scare tactic** used by federal agencies and industry advocates to facilitate either a.) commercial logging or, b.) use of forestry practices where they are not necessarily needed. With limited forest practices within the U.S. Forest Service, managers simply resort to the tired old toolbox of cutting our way out of every perceived, or those forests dominated by ponderosa pine experience, natural/healthy, high-intensity fires (Pierce, J. L., G. A. Meyer, and A. J. T. Jull. 2004. Fire-induced erosion and millennial-scale climate change in northern ponderosa pine forests. Nature 432:87-90.). Further, he patchy nature of many fires enhances diversity in future burning and flora/fauna biodiversity. Characterizing high-intensity fires in the forests types present in the Highline Area as "uncharacteristic" constitutes a misreading of the established science literature on this topic, at best, or simple malpractice (worse). These types of hyperbolic statements are what I often refer to as agency "bandwagon science"; they statements get repeated because they are simple, though uninformed, and used to justify yet more active management with simple quips. Finally, the EA also paints the "risk" as being Area-wide, while much of the forest is at great distances from federal property lines or established development which presumably is the risk of concern.
    - **Wildfire will not make ecosystems less resilient**. Fires, of various intensities and sizes, if left to burn naturally increase species diversity, as well as forest complexity allowing future fires to burn more unevenly (i.e., in broad mosaics of forest types and ages). These diverse, inconsistent, forest patches contrast with overly-managed forests which promote monotypes more apt to burn across wider expanses in uniform patterns.
    - **Spruce beetle (*Dendroctonus rufipennis*) epidemics are endemic to this region.** These forests have endured and adapted to insect outbreaks from this native species since time immemorial. Beetles evolved symbiotically with fire. Dead trees are more flammable for a few years, then *less flammable* than live trees in a dry year (Kulakowski, D., T. T. Veblen, and P. Bebi. 2003. Effects of fire and spruce beetle outbreak legacies on the disturbance regime of a subalpine forest in Colorado. Journal of Biogeography 30:1445-1456).
    - **That "risk" word again as a scare tactic.** These native insects (see above) evolved for millennia within Utah forests. Framing needed actions as essential responses to contrived risks is not working with "the best available science."
    - **Aspen as wildlife habitat.** Yes, aspen are keystone species AND (mostly) disturbance dependent in this region. However, wildfire helps to not only ensure vegetative regeneration, but intense wildfire appears to facilitate sexual regeneration (a.k.a., true seedlings) which further increase genetic diversity (Kreider, M. R., and L. L. Yocom. 2021. Low-density aspen seedling establishment is widespread following recent wildfires in the Western United States. Ecology 102:e03436.). Silvicultural practices alone will "miss" this opportunity. Aspen responds very well to fire, but has mixed results—especially with intense ungulate herbivory present in the Highline Area—with forest cutting alone. Sound aspen sustainability, as keystone species, will best be supported by *expanded* wildfire alongside reduced (unfettered) domestic and wildlife herbivory (Kerr, S. B., A. C. Rhodes, A. Hulet, R. Pienaar, and S. B. St. Clair. 2026. Long-term

monitoring of aspen forest regeneration and ungulate use shows successful recruitment amid landscape-scale forest restoration. Forest Ecology and Management 602:123373).

- **Wildfire, as opposed to tree removal, retains more carbon.** Burnt trees left in place are an excellent way of maintaining carbon stocks *in situ*. While some carbon is lost via the combustion process, vast amounts are maintained in standing and downed trees; eventually facilitating high-carbon soils while forest recover from the disturbance over the coming decades and centuries.
- **Response to warming climates.** Right now, we are experiencing higher rates of burning in the face of multi-year drought patterns. But don't take this out of context: we have just emerged from a very wet century climatically. In short, we should and will experience additional/expanded wildfire in our region, as well as with the Highline Area. The question is, will we accelerate drought vulnerability via selective tree cutting? Opening up forests and clearing understory vegetation/shrubs will enhance drying, whereas intact forests with limited human intervention will remain relatively cooler and wetter…acting as "climate buffers" to uniform burning conditions. (Similar climatic buffers, via on site moisture presence, are found at higher elevations, on N, NE, facing slopes, and near streams/lakes/ponds/springs.)

- (p.35) **Cutting to promote Old Growth.** If this seem counterintuitive, it is. Over time, forest resilience and, yes, "old growth" are promoted by periodic disturbances (fire, bugs, diseases, wind, avalanches/landslides). Larger trees can often survive even the most intense fires, but (over long periods of time) survivors are slowly eliminated in a selective manner. Human beings, perhaps USFS foresters as exemplars(?), are notoriously impatient as compared to the much longer lives of trees. This sentence from the EA would be viewed as humorous to many forest ecologists: "*To maintain mature and old growth stands, protective measures like controlled burns and mechanical treatments are necessary to disrupt vegetation continuity*." If this were true, how did these old growth forests originate, over centuries, without such "protective measures." Clearly, the logic is flawed.
    - **Enhancing aspen habitat.** The citation is somewhat out of date, but more to the point modern science speaks clearly to the fact that large ungulates (deer, elk, domestic species) are as big or bigger problem than lack of fire. (Bear in mind this dearth of fire is more due to a previously wet climate of the last century than fire suppression. We all expect that will change with expected increasing drought.) Specifically, recent works from Utah clearly point out that *no management* actions should take place without a plan to limit post-management (and fire!) ungulate browsing if we wish to manage aspen sustainably (Kitchen, S. G., P. N. Behrens, S. K. Goodrich, A. Green, J. Guyon, M. O'Brien, and D. Tart. 2019. Guidelines for aspen restoration in Utah with applicability to the Intermountain West; Rogers, P. C. 2017. Guide to Quaking Aspen Ecology and Management. USDI, Bureau of Land Management, Salt Lake City, Utah).
- **(General) Fire risk in Developed (WUI) vs. Interior Forests.** At the forests edge, near homes, it is commonly recommended that active forest management take place to prevent fire spread to established residences. However, that zone of public land should be relatively small compared to the vast land holdings of federal agencies that are forested and at distance from homes. This precept balances forest resilience/health where fires of various intensities have enumerable benefits with those of private property owners. Moreover, the brunt of responsibility should come on the private landholding side of the formula; taking precautions to remove flammable vegetation and materials from near buildings, restricting building broadly near forested lands that commonly burn, and reduce road-building or closing roads, as human-set fires in these populated/developed locales are much more common now that lightning caused fires. Detailed support for these ideas can be found throughout the contemporary forest science literature (e.g., Schoennagel, T., J. K. Balch, H. Brenkert-Smith, P. E. Dennison, B. J. Harvey, M. A. Krawchuk, N. Mietkiewicz, P. Morgan, M. A. Moritz, and R. Rasker. 2017. Adapt to more wildfire in

western North American forests as climate changes. Proceedings of the National Academy of Sciences 114:4582-4590; Moritz, M. A., R. Hazard, A.-M. Parkinson, and G. Wesolowski. 2022. Beyond a focus on fuel reduction in the WUI: The need for regional wildfire mitigation to address multiple risks. Frontiers in Forests and Global Change:71; Rogers, P.C. 2024. At Home with Forest Fires in the West. In: Brister, E.; Probst, L., Frodeman, R. (eds.) *A Watershed Moment: The American West in the Age of Limits*. University of Utah Press. Salt Lake City, Utah. p. 275-287).

Respectfully,

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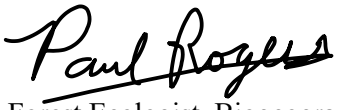

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