

Data Submitted (UTC 11): 6/24/2026 5:58:48 AM

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Organization:

Title:

Comments:

As an avid hiker of this lovely canyon, I am completely against this proposal. Even with extremely limited time, which was never standard protocol until now, I will make my comments as comprehensive and scientific as possible. Which the Forest Service hasn't done in their documentation.

The South Beaver RX is a good starting point to demonstrate USFS's relationship with prescribed burns, where historical cultural practices with fire have been abandoned for the industrial reclassification of all old growth trees and plants being classified as "encroachment," and USFS can incinerate all of it on a whim. Encroachment now means anything that may haphazardly get in the way of roads, transmissions lines, or simply be desirable acre-feet to the timber industry. Take your pick, South Beaver RX, which then turned into a massive 6000 acre wildfire (and is now contributing to the current explosive Cottonwood Fire), or the 2022 Calf Canyon/Hermits Peak Fire which was the largest and most destructive wildfire in the history of New Mexico, also started by irresponsible RX burn. These RX burns destroy biodiversity, watersheds, and are no longer done in good practice. They are there to eliminate undesirable species to the timber and livestock industries, and the science no longer supports their use to prevent megafires. It takes decades or more for it to no longer vastly increase wildfire risk:

Identifying and managing disturbance-stimulated flammability in woody ecosystems

<https://onlinelibrary.wiley.com/doi/10.1111/brv.13041>

Mechanisms by which growth and succession limit the impact of fire in a south-western Australian forested ecosystem

<https://besjournals.onlinelibrary.wiley.com/doi/10.1111/1365-2435.14305>

"The human enterprise is engaged in a process of converting the rest of nature into human bodies and the artifacts of our culture."-- Bill Rees We are destroying the foundations of life on Earth. Soon we'll discover that means us, too.

Img 1: South Beaver RX

As our planet continues to warm, biodiversity fades, and forest fires grow worse, does it make sense to keep eliminating the trees with the highest biodiversity values, lowest probability of flammability, and best ability to sequester CO2 and reflect solar radiation from our forests?

The result is that hundreds thousands of acres are sprayed every year, creating a tree-farm monoculture that's less hospitable to wildlife, insects, fungi, and fish than a mixed-wood forest. Not only that, but the use of glyphosate has numerous other negative effects, including damage to waterways, reduced carbon sequestration, and a highly flammable landscape. Coniferous trees are highly flammable and deciduous (leafy) trees are much less flammable. <https://firesmartbc.ca/resource/firesmart-bc-begins-with-you-guide/>

Why Large-Scale Native Plant "Restoration" Cannot Work

<https://sfforest.org/2021/06/16/why-large-scale-native-plant-restoration-cannot-work/>

Species like aspen, willows, and birch help build soil for conifers, they improve watershed function, they're important for biodiversity, and they provide food and forage for moose, beaver, and birds. None of these practices have animals and their wellbeing in mind (img 3: USDA has killed 56 million wild animals since 2004

(2023)), and especially not the plants.

Img 2: earth animal biome (humans and livestock represent 96% of mammal biomes, vastly shrunken from previous decades

The forest service is requesting destructive air curtain to scrape the forest floor of all biodiversity and also poison it with herbicides. These cause cancer and countless other ailments. Not good for a watershed of 2.5+ million people.

Img 4: Air curtain

EU's "Safe levels" of glyphosate cause cancer, new study finds (US "safe levels" are orders of magnitude higher than EU limits):

<https://link.springer.com/article/10.1186/s12940-025-01187-2>

Mapping pesticide mixtures to cancer risk at the country scale with spatial exposomics

<https://www.nature.com/articles/s44360-026-00087-0>

None of the world's top industries would be profitable if they paid for the natural capital they use

<https://grist.org/business-technology/none-of-the-worlds-top-industries-would-be-profitable-if-they-paid-for-the-natural-capital-they-use/>

Regional uniqueness of tree species composition and response to forest loss and climate change

<https://www.nature.com/articles/s41467-024-48276-3>

Migrating animals face collapsing numbers

<https://www.cms.int/publication/state-worlds-migratory-species>

This is a rapid attempt by the GOP to eliminate the roadless rule by "emergency" means.

Mike Lee, GOP colleagues move to permanently kill the Roadless Rule <https://www.hatchmag.com/articles/mike-lee-gop-colleagues-move-permanently-kill-roadless-rule/7716293>

Up to half of world's wild tree species could be at risk of extinction

<https://www.bgci.org/our-work/projects-and-case-studies/global-tree-assessment/>

Agrochemicals take a big toll on Global South, new Atlas of Pesticides shows

<https://news.mongabay.com/2024/02/agrochemicals-take-a-big-toll-on-global-south-new-atlas-of-pesticides-shows/>

Our taxes fund an obscure government program that kills millions of wild animals to benefit Big Ag. (forestimg3)

<https://www.vox.com/future-perfect/24138394/usda-wildlife-services-livestock-meat-animals>

Forest Service's error rate for retardant dropped into sensitive waterways is so high. In 2012, the USFS dropped 8 million gallons of retardant from aircraft in firefighting efforts. In 2020, the amount shot up to 21 million gallons.

<https://www.king5.com/article/news/investigations/dozens-of-fire-retardant-drops-in-pnw-killed-fish-including-endangered-salmon-steelhead/281-16bf04e5-6516-41a8-b824-c0e73d88ae62>

If the timber industry, which USFS will entrust with logging this sensitive forest, can't even cover the costs of wildfires on their own lands, then how are we supposed to trust that these timber industry practices being

exported to our public lands are to work?

<https://oregoncapitalchronicle.com/2024/01/10/timber-industry-tied-to-proposal-shifting-wildfire-protection-costs-from-landowners-to-public/>

The public trust in this institution will be forever tarnished if any level of it is allowed to commence. The most beautiful hikes on earth will be demolished for the timber industry and human corruption.