

Data Submitted (UTC 11): 6/24/2026 3:53:32 AM

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Comments: I have many concerns with this proposed project. I will briefly discuss a few of these below.

Cultural Resources

The draft proposal for this project states that the proposed treatments "may impact cultural resources," but claims that not conducting these "treatments" could create conditions that put cultural resources at risk.

We can't talk about protecting cultural resources without mentioning the example of the Hermits Peak/Calf Canyon Fire in New Mexico, which was the largest wildfire in the history of New Mexico, burning an area roughly the size of Los Angeles. It was, of course, caused by an escaped USFS prescribed burn and burn piles that had smoldered and reignited after months of snow. These escaped and reignited prescribed fires destroyed many cultural resources and wiped out whole communities whose rich generations-long cultural backgrounds had been defining features of the area.

The incident summary and agency analysis following this USFS-caused devastation stated that years of "treatment" had opened the canopy, allowing more sunlight to shine through and fuels to dry out more rapidly, contributing to the intensity and spread of the fires.

It is hubris to suggest that these proposed actions in Utah are necessary to protect cultural resources or people in nearby communities.

Air Quality

The claim that this project will ultimately reduce air pollution is not credible. Leaving aside the dust and diesel emissions generated by these activities, on no planet does a cumulative 11,794 acres of broadcast burning and over 4,000 acres of pile burning not add to the air pollution burden in this airshed. In reality, it will have an additive effect: More smoke on top of the smoke that drifts in from fires from outside the area; pollution during times of year when pollution levels otherwise would have been lower; more pollution when air quality is already bad; more smoke on top of fires that will happen in the region anyway...

The project plan states that prescribed burns will be monitored visually, and if any prescribed burn "appears to be generating too much smoke" measures will be taken to shut down the burn. What is considered "too much"? There is no known safe level of fine particle air pollution. All added pollution causes harm. Additionally, the most harmful components of biomass combustion are not visible to the naked eye. Visible smoke opacity is an outdated means of gauging harm.

A study from Carnegie Mellon researchers last year found that prescribed burn smoke kills slightly more people annually in the US than smoke from wildfires each year, based on 2017 data. Other peer-reviewed research has shown that, per unit of land burned, prescribed fire smoke has been found to have significantly higher healthcare-related costs than wildfire smoke.

Plainly stated, people will be made ill and some may die from the added pollution caused by this project.

"Fuels reduction"

Recent high-profile peer-reviewed research elsewhere in the world has found that prescribed burning ultimately

makes the landscape more flammable. After the burn, new growth quickly fills in, often more lush and flammable than before. The documentation with this project even states that ground cover will fill back in within a couple of years. How is this a long-term "fuel reduction" project? It isn't.

What it does do is create a situation where the landscape is burned, often, and in perpetuity to keep ever-more flammable new growth at bay. This is a nightmare scenario for the environment and public health.

In addition to all this, even if a fire were to occur during the brief window before vegetation fills back in, if there is an ignition when it's dry and hot and windy enough, it will turn into a large fire, regardless of fuel on the ground. The big fires people fear are weather-driven.

Climate change is the driver of more frequent large high-intensity fires. Emitting more climate pollutants, as this project will do, adds to the feedback loop creating the conditions that drive big fires.

Herbicides

It also must be stated that the planned application of toxic herbicides in the municipal watershed that supplies the treatment plant providing the community's potable water is incredibly irresponsible, at best.

I strongly object to this proposed project.