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Comments: 1. Specific Objections to the Environmental Assessment of the Big Cottonwood Canyon (BBC) Project

We dispute the Emergency Action Determination by the Forest Service that allows a waiver of pre-decisional administrative review. That determination should require some degree of objective, empirical evidence, studies of comparable circumstances rather than just subjective justification on the basis of the "recent low snow pack and the vague, poorly defined, and unsupported claim of "heavy fuel loading." If objective information is available to make such a determination, justifying such extreme and costly measures, then the agency should be taking other action to reflect that emergency, such as limiting recreation and other human activity in the same area given that humans cause the overwhelming majority of wildfires. For example, the agency should be lobbying the state to be more proactive on other control measures to reduce forest fires, such as prohibit the sale or possession of fireworks because it is impossible to control where they are used once purchased. The state could do much more to prohibit target shooting, another common cause of wildfires.

If there is indeed an "emergency" fire risk justifying reducing public input the way the agency has done in this case, then the response should be focusing on forest home protection, the technique of "home hardening and creating defensible space," not giving home owners the false promise that landscape scale forest thinning will protect them.

2. Most "Fuels Reduction" Projects are Forest and Wildfire Malpractice

UPHE is one of at least 60 environmental groups throughout the country that dispute the basic premise that drives the Forest Service's insistence on "fuels reduction" projects.

Likewise, the agency's claims of benefits from this project rest on evidence that is contradicted by independent research. The research used to justify the narrative that our forests need thinning throughout the Western US is clouded by conflict of interest. It operates under the umbrella of the US Dept. of Agriculture, which treats forests as a commodity resource. Consider this parallel. If the FDA received revenue from Prozac sales, published their own research or that of the manufacturer showing its efficacy, and heavily promoted Prozac, the conflict of interest would be obvious. Within the medical community that conflict of interest would appropriately taint the conclusions of the research.

There is no reason the Forest Service's research should be treated differently. The agency's mandate includes acting as a facilitator for the logging industry, and historically it has consistently played that role. It promotes lumber and wood products with videos like this, that encourage burning wood for heat, the most polluting way possible to heat a home (and more carbon intensive than using coal), while simultaneously claiming thinning creates healthier forests. The agency receives some of its funding selling trees to the timber industry. This obvious conflict of interest is institutionalized, and warrants suspicion towards agency research that finds active management, especially commercializing forests, makes them healthier. If agency sponsored research is untainted and scientifically valid, it should at least generally agree with independent research. That is not the case.

3. Firebreaks are of limited or no value in extreme conditions

This stated purpose and need of this project is to reduce "uncharacteristic" fire behavior; presumably severe or intense fires. But in those circumstances, high wind is invariably a dominant factor, and in that setting, firebrands

easily travel much further than the width of fire breaks, something that is often inadequately represented in fire simulation models.

Therefore in the very situation that this project is ostensibly intended to address, a pillar of the strategy behind this project, "fire breaks," are of limited value and may be entirely useless.

4. The Project is Climate Malpractice.

Even policies intended to improve certain wildlife or vegetative habitat, but require forest thinning, must be suspended if they also worsen the short-term atmospheric carbon equation. For virtually any public policy that impacts our climate, those climate consequences must be given priority, especially those with immediate impact on atmospheric carbon concentrations.

5. The Project is Public Health Malpractice-Air Pollution

Physicians at UPHE specialize in air pollution and its health effects. We strongly object to the cavalier dismissal of public health impacts from this project.

Air pollution kills people. Researchers estimate that up to 8,000 people die in Utah every year because of the various sources of air pollution in the state. Air pollution also causes or exacerbates a list of chronic adult diseases and poor pregnancy outcomes as long that those caused by smoking cigarettes, which is a similar source of air pollution.

There is a dictum in the medical community that may be the first principle of physician practices, "First do no harm."

We find no parallel in the practice of medicine that comes close to the poor risk management and harm inherent in this project. To us it seems as nonsensical and extreme as recommending random 20 year-old patients undergo chemotherapy, radiation therapy, and multiple organ removals on the possibility of getting cancer some day in the future.

6. The Project is Public Health Malpractice-Herbicides and PFAS

Forest managers often use massive amounts of herbicides as part of their "fuels reduction" projects, even extolling it as an "integral part" of modern forestry practice because they claim it increases forest wood volume and even biodiversity. This particular project is also paired with widespread herbicide use which should be absolutely prohibited given that Big Cottonwood Canyon is responsible for 40% of Salt Lake City's culinary water.

Ten years after their use, herbicides (typically glyphosate, i.e. Roundup) can still be shown to reduce plant species diversity in the understory. But the human health impacts are far more alarming, and are usually dismissed or completely misunderstood by those who make decisions on their use in forestry. In the EA we could find no acknowledgement whatsoever of any consequences to herbicide use.

7. Aesthetic Damage to the Canyon

The EPA says that visual disturbance of the scenic beauty of the prescribed burn areas may dominate visitor views, but that would only be a short-term issue, because regrowth would occur within five years or less. To characterize five years as "short-term" damage as license for this project is jarring rationalization. But that also means if indeed there were any fire suppression benefit from the broadcast burns, they would be equally "short-lived." If this project is to last ten years, and but it's presumed benefit only lasts five, then unless the Forest Service plans on rotating, perpetual burning and chain saw management of the canyon, it sounds like the

presumed benefit can only be described as temporary.

Moreover, in discussing the impact of broadcast burns, the EA says that impact on the soil would only last 1-3 years because ground cover would then return. If so, then the fire mitigation of the broadcast burn would be just as short lived. And if the surface vegetation removed is replaced with grasses, the fire vulnerability would like be worse than before the project as discussed earlier.

8. Impact on Water Resources

For obvious reasons the seasonal opportunities for landscape and pile burning are limited to spring and fall and will often occur when there is snow on the ground. It is a well-studied phenomenon that dust and black carbon particles from any pollution source, landing on snow pack, reduces the surface albedo, accelerating the melt of snow pack and ice when those particles are exposed to sunlight. Furthermore, the phenomenon creates a feedback loop such that as the snow melts, the black carbon concentrations steadily increase, warming the temperature of the snow and accelerating the premature melting as it progresses. Indeed, dust from the dried up Great Salt Lake lakebed was estimated to cause the Wasatch Mountain snow pack to melt 17 days earlier than would have happened otherwise during the 2021-2022 winter.

The exact same phenomenon will occur from any burning conducted by the Forest Service in Big Cottonwood Canyon. Given that the central risk factor for increasing the vulnerability of the canyon's forest to wildfire is lack of snow, this project is set up to be self-defeating, even if all the other assumptions being made by the agency are correct.

Adding to that, in the immediate aftermath of a fire, manmade or otherwise, the snowpack disappears faster. Removing trees and opening up the canopy exposes the underlying snowpack to more solar radiation which also melts the snow faster. As discussed earlier, removing trees increases wind in the forest which not only accelerates fire spread, but can contribute to snow pack loss even if the loss of trees increases the original amount of snow fall.