

April 24, 2025

Kim Obele, District Ranger
Westside Ranger District
Caribou-Targhee NF
50 S Cliffs Drive
Pocatello, Idaho, 83204

Re: Lower Portneuf Cooperative Vegetation Management
Project

Dear Ranger Obele,

Please accept these additional comments from me on behalf of the Alliance for the Wild Rockies, Yellowstone to Uintas Connection, Council on Wildlife and Fish, Center for Biological Diversity, Wildland Defense, and Native Ecosystems Council on the proposed Lower Portneuf Cooperative Vegetation Management Project.

The largest relevant study ever done, of over 1,500 fires covering 23 million acres by Bradley et al. 2016, (attached) concluded the more “thinning” of trees in a forest [the more quickly and intensely](#) a wildfire burns. One author writes, “Dense, mature forests tend to burn less intensely ... because they have higher canopy cover and more shade, which creates a cooler, more

moist microclimate. The higher density of trees of all sizes can act as a windbreak, buffering gust-driven flames. Thinning and other activities that remove trees, especially mature trees, reverse those effects, creating hotter, drier, and windier conditions.” Even a USFS review of the [largest fire](#) in New Mexico history, a mismanaged prescribed burn, agreed.

Please see the attached paper by Schoennagel et al. 2017, concluded that [“fuels reduction cannot alter regional wildfire trends.”](#)

Intentional burning produces massive amounts of deadly air pollution. Please see the attached paper by Maji et al. 2024 concluded America’s “prescribed burns” annually cause about 10,000 premature deaths and \$100 billion in health costs, about the same as from wildfires.

How many premature deaths will this project cause and how much will it increase health care costs?

Thank you for your time and consideration of our comments.

Sincerely yours,

/s/

Mike Garrity

Executive Director

Alliance for the Wild Rockies

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And for

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And for

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