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Submitted electronically via the Federal eRulemaking Portal

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RE: Docket No. FS-2025-0001; RIN 0596-AD66. Comments on the Draft Environmental Impact Statement and Proposed Rule, "Special Areas; Roadless Area Conservation"

Dear Acting Director Kinder,

On behalf of the Salt Lake County (Utah) Mayor's Office, I am writing in response to the Draft Environmental Impact Statement (DEIS) published by the U.S. Department of Agriculture (USDA) on August 20, 2026, in which alternatives propose full or partial rescission of the 2001 Roadless Area Conservation Rule ("Roadless Rule"). My office appreciates the opportunity to comment on the DEIS. Respectfully, we oppose any rescission of the Roadless Rule and support the DEIS's "No Action" alternative.

Utah is comprised of nearly four million acres of inventoried roadless areas (IRAs). Approximately 30,000 of those acres lie within Salt Lake County in the Wasatch Mountains, including Big Cottonwood, Little Cottonwood, Millcreek, and Parleys Canyons. These locations are among the most heavily used recreational landscapes in the state and are indispensable to our region's drinking water security, outdoor recreation economy, wildlife habitat, and wildfire resilience. Removing long-standing protections against permanent roads and industrial activity would put these landscapes, and the communities that depend on them, at unnecessary risk.

Salt Lake County is Utah's most populous county, home to more than 1.2 million residents. Salt Lake County's IRAs sit closer to a large urban population than almost any other IRA in the country, underscoring their value to our residents' everyday lives by providing access to nature, clean water, and outdoor recreation.

Our Salt Lake County government delivers essential services including public health and safety, watershed management, emergency response, parks and trail recreation programs, roadway planning, and land-use regulation. The County also manages important public amenities while promoting sustainable growth, economic development, community resilience, and environmental stewardship.

As the regional government, we support the leadership of the Salt Lake City Department of Public Utilities in safeguarding the water supply that originates in these protected roadless areas

and serves more than 400,000 residents within a 141-square-mile service area. These users represent a significant share of Salt Lake County's population, and their water security depends on the continued health of the Wasatch Canyons. Rescinding the Roadless Rule could jeopardize this critical resource and pose serious threats to the health and safety of our region.

Utah's Forests and Impact on Our Communities

Drinking Water Access and Quality

The Wasatch Canyons serve as critical headwater protection zones for Salt Lake County. More than 60 percent of Salt Lake City's municipal water supply originates in these headwaters, providing culinary water to all or portions of many municipalities within our county. Even limited disturbance in the canyon areas that store and convey this water can meaningfully affect water quality by accelerating erosion, increasing impervious surfaces, and introducing hydrocarbons, metals from brake degradation, road salts, and vehicle spills, which would strain the current water treatment systems. Additionally, increased human access through new roads further elevates the risk of unauthorized camping, trash dumping, and waste contamination, all of which directly degrade water quality and increase treatment costs.

In addition, road construction and logging reduce the natural water storage and filtration capacity of these forests, diminishing their resilience to drought and climate variability. Erosion from disturbed slopes also shortens the lifespan of downstream reservoirs by reducing storage capacity, compounding both water supply and flood control challenges. Erosion also carries nutrients downstream which decreases dissolved oxygen and adds to the Harmful Algal Bloom problem that exists in many lakes or rivers in the Salt Lake County, compounding water supply, flood control, and water treatment challenges.

Recognizing that our forests serve as natural water filters by trapping sediment and promoting the delivery of clean drinking water, Salt Lake City, Salt Lake County, and the USFS have successfully managed our forests for over a century. While we understand that a rescission of the Roadless Rule would not necessarily result in immediate road construction, the Roadless Rule has functioned for a quarter-century as a key tool allowing the County and our partners to manage this watershed and maintain consistent, durable protections for a resource our residents depend on every day.

Local Governance

The proposed rule states that “the intent of this proposed action is to reduce regulatory burden and return decision making for the management of inventoried roadless areas to the land management planning process at the individual national forest level” (91 Fed. Reg. 53,827). As a regional government, we recognize the value the Roadless Rule provides in protecting our watershed and ecosystems. The Rule provides a clear framework within which local land managers operate, prioritizing protections of the lands while still including established exceptions for fire, insect and disease mitigation, and public safety needs.

We are concerned that replacing one national rule with forest-by-forest land management plan revisions, as the DEIS proposes, would multiply the number of individual planning processes our County must track and coordinate between multiple stakeholders, which would be a significant staff-time and coordination cost. We also note that the Roadless Rule has withstood a quarter-century of litigation. Rescinding the Rule risks reopening years of legal uncertainty for the Forest Service, the County, and the communities who rely on stable, predictable management of these lands.

Increased Wildfire Risk

We understand that the current Roadless Rule already permits mitigation and public-safety activities, and effective fire mitigation work has occurred and is currently occurring within and adjacent to IRAs in Salt Lake County. The Roadless Rule as it stands is therefore able to adapt to individual forest needs, especially pertaining to fire mitigation and public safety activities.

Limiting road construction is a key principle to preventing fire risk, and for that reason Salt Lake County is highly concerned by a rescission of the Roadless Rule. While proponents of rescission suggest that new roads will facilitate wildfire management, the best available data suggests otherwise. A three-decade, nationwide study of Forest Service wildfire records found that wildfire ignition density is lowest in designated wilderness and IRAs, and highest in lands within 50 meters of a road.¹ The same study found that roads are roughly four times more likely to have a fire than land in roadless and wilderness areas. Humans are responsible for 77% of unplanned wildfire ignitions nationwide from 1992–2024 (rising to 85% when ignitions of unknown cause are excluded), meaning that building new roads and increasing human visitation into current IRAs is likely to introduce more, not fewer, wildfire ignition points.²

Further, local examples in Salt Lake County demonstrate that fire management can and does still occur even within and adjacent to IRAs. In 2023, 1,100 acres of cut-and-pile treatment and more than 500 acres of lop-and-scatter treatment in Millcreek Canyon occurred to prevent wildfire and the spread of insects and diseases. This year the Big Cottonwood Canyon Watershed Restoration Project, a fire mitigation project in and adjacent to IRAs, is now proceeding under a Fuels and Forest Health Emergency Situation Determination. The proposed action will consist of thinning and shaded fuel breaks across approximately 4,900 acres within an 18,680-acre project area. Both projects demonstrate that meaningful fuels and forest-health work is already occurring in and near our County's IRAs. Existing exceptions and emergency authorities allow for critical work to be done under the current Roadless Rule and the rescission is not necessary for effective fire management.

This risk is not merely theoretical: some of the largest and most destructive wildfires in recent U.S. history originated at or near roadways. California's 2018 Carr Fire, which burned approximately 229,000 acres was ignited when a vehicle's flat tire caused its steel wheel rim to scrape the pavement, throwing sparks into dry roadside grass.³ Utah state fire officials have specifically identified dragging trailer chains and roadside vehicle sparks as recurring wildfire ignition sources.⁴

Additionally, wildfire strategy and emergency management efforts are most effective when concentrating on precision oriented “at-risk” areas of proximity to homes, such as the Wildland-Urban Interface (WUI), rather than on remote roadless terrain. Prioritizing WUI management, while preserving IRAs, directly advances USFS's own wildfire resilience objectives, without the added ignition risk that new permanent road construction would introduce.

Recreation Economy and Local Impact

Utah's renowned outdoor recreation opportunities are central to the state's identity and economy, and Salt Lake County's roadless lands are among its most heavily used recreational landscapes. Activities such as hiking, camping,

¹ Gregory H. Aplet, Phil Hartger & Matthew S. Dietz, *Three-Decade Record of Contiguous-U.S. National Forest Wildfires Indicates Increased Density of Ignitions near Roads*, 22(1) Fire Ecology 8 (2026), <https://doi.org/10.1186/s42408-026-00450-2>

² Headwaters Economics. (2026). *Lessons from 30 Years of Wildfire Ignition Data*. Headwaters Economics. Retrieved from <https://headwaterseconomics.org/natural-hazards/wildfire/lessons-from-30-years-of-wildfire-ignition-data/>

³ National Park Service, Carr Fire Investigation Report (2018)

⁴ Utah News Dispatch, *Weekend Brings New, Human-Caused Wildfires to Utah* (Aug. 2025), <https://utahnewsdispatch.com/2025/08/04/new-human-caused-fires-in-utah/>

climbing, backcountry skiing, mountain biking, fishing, and hunting depend on undeveloped, road-free terrain. New roads and logging activity would diminish the scenery, limit solitude, and reduce the recreational and tourism value of these lands.

Notably, USDA's own proposed rule projects an estimated \$6.1 million per year in lost recreation-related economic benefit nationally as a possible result of the rescission. While this is a national figure rather than a Salt Lake County-specific estimate, it illustrates that the recreation and tourism costs of the proposed rescission are real and quantifiable. Utah's outdoor recreation economy is estimated at \$9.5 billion, of which winter sports is the single largest contributing sector. Salt Lake County's IRAs are woven throughout terrain known for world-renowned skiing and backcountry access. Weakening the protections on these lands risks changing the character of a landscape that is one of the largest economic assets to both our county and state.

We would also note that with Salt Lake City and County preparing to again host the Winter Olympic Games in 2034, the enduring quality of our backcountry terrain remains directly tied to our region's recreation economy and international reputation. The 2001 Roadless Rule has been a notable tool in preserving the lands that will provide backcountry access and recreation to those visiting for the Games.

Wildlife and Habitat

Utah's roadless areas provide refuge for numerous species, including elk, black bears, and sensitive nesting raptors and plant species. Permanent roads carve corridors into natural habitat that can disrupt migration routes and increase the spread of invasive species through increased human traffic. Once fragmented, these ecosystems cannot be restored to their original condition, undermining decades of conservation progress. Maintaining intact habitat and biodiversity in the Wasatch Canyons is consistent with USFS's own commitment to sustaining forest productivity and wildlife values.

Emergency Management and Flood Risk

Beyond wildfire, intact roadless areas play an important role in reducing flood hazards and protecting public safety during high stream flows and spring runoff events. These headwaters provide natural attenuation of peak flows, slowing runoff and reducing downstream flood severity. Disturbances caused by road construction or slope clearing increase erosion, debris flows, and sedimentation, which can overwhelm downstream flood control infrastructure and heighten flood risk in downstream communities. When road networks are cut into steep canyon terrain, they can also create access corridors that quickly become impassable during floods, avalanches, or debris flows, increasing the demand on emergency responders and diverting already scarce resources.

Recommendation

In summary, the Salt Lake County Mayor's Office sincerely urges USDA to adopt the DEIS's "No Action" alternative and retain the 2001 Roadless Rule in full. These protections safeguard more than 60 percent of the water supply to Utah's capital city and the regional water supply serving more than 400,000 County residents, ensuring the health and safety of our region.

Salt Lake County acknowledges the importance of wildfire mitigation and fully supports efforts to reduce wildfire risk — including the fuels-reduction and watershed-restoration work already underway in Millcreek, Parleys and Big Cottonwood Canyons — but that goal should not be relied upon as a justification for rescinding the Roadless Rule, particularly given the risk that new road construction could increase, rather than decrease, wildfire ignitions.

As a county government, we have come to rely on the 2001 Roadless Rule as a durable framework guiding the protection of landscapes that provide our residents with water and access to nature. Shifting that responsibility to the local level without the Rule's baseline protections would set a concerning precedent and place additional planning burdens on the County and the Forest Service alike. Retaining the 2001 Roadless Rule's protections directly aligns with USFS's goals to sustain healthy, diverse, and resilient forests and with USDA's mission to conserve natural resources and safeguard public health.

Thank you in advance for considering these comments and for your ongoing engagement with impacted communities such as Salt Lake County.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Wilson', with a stylized, flowing script.

Jennifer Wilson
Mayor, Salt Lake County