

BLUERIBBON COALITION

Defending Access · Multiple Use · Public Lands

Date: June 23, 2026

To: Adam Shaw, District Ranger, Salt Lake Ranger District, Uinta-Wasatch-Cache National Forest

Submitted via: CARA online comment portal (Project #303870)

Re: Response to air-quality and public-health comments submitted by Utah Physicians for a Healthy Environment — Big Cottonwood Canyon Watershed Restoration Project Draft EA

Introduction and Summary

The BlueRibbon Coalition (**BRC**) submits these comments in support of the Big Cottonwood Canyon Watershed Restoration Project (**the Project**) and to respond to the air-quality and public-health comments submitted by Utah Physicians for a Healthy Environment and Doctors and Scientists Against Wood Smoke Pollution (together, **UPHE**). BRC is a national non-profit that advocates for responsible recreation and multiple-use management of federal public lands. We support the Project because the alternative to managed fuels reduction in this municipal watershed is not the absence of fire and smoke — it is the near-certainty of an uncharacteristically severe wildfire and the far larger, uncontrolled smoke event that would accompany it.

UPHE's comments raise the public-health effects of smoke and herbicides. BRC does not dispute that smoke from any source carries health risk, and we agree the agency should hold its burn operations to rigorous standards. But UPHE's comments do not undermine the Draft EA's analysis or its Finding of No Significant Impact. They rest on (1) a single out-of-region anecdote, (2) two studies whose own findings cut against UPHE's conclusion once read in full, and (3) herbicide and PFAS concerns that are largely untethered from what this Project actually proposes. The Project's compliance with the Clean Air Act, the Utah Smoke Management Program, and the agency's design criteria is the public-health mechanism UPHE says is missing — and it is already in the record.

I. The Correct NEPA Baseline Is Wildfire Smoke, Not Zero Smoke

UPHE's central framing — comparing prescribed-burn smoke against a clean-air baseline — is the wrong comparison under NEPA. The agency must weigh the Proposed Action against the No-Action alternative. **The No-Action baseline in this canyon is not clean air; it is the continued accumulation of hazardous fuels and the elevated probability of a high-severity wildfire** over a watershed that supplies roughly 40% of Salt Lake City's culinary water. The Draft EA documents fire-regime departure (Fire Regime Condition Class approaching Class 2), heavy dead-and-down loading, and widespread Balsam Woolly Adelgid mortality. The relevant question is therefore not “smoke or no smoke,” but “managed, permitted,

low-intensity smoke under controlled conditions — or unmanaged, uncontrolled, high-intensity wildfire smoke at a time and place no one chooses.”

This distinction is not rhetorical; it is the consensus of the scientific and regulatory literature. The U.S. EPA’s own comparison of prescribed fire and wildfire smoke emphasizes that, unlike wildfire, prescribed fire is a planned event for which communities and individuals can take health-protective actions in advance to reduce exposure. Peer-reviewed modeling of western fire regimes has found that PM_{2.5} emissions are reduced by roughly half when a given landscape burns under prescribed-burn conditions rather than wildfire conditions. UPHE’s comments do not engage this baseline at all.

II. The Helena Anecdote Does Not Describe This Project

UPHE leads with a single April 2025 prescribed burn near Helena, Montana that produced a severe overnight PM_{2.5} spike. A single adverse outcome from one burn, in a different airshed, under different terrain, meteorology, and management, does not characterize a ten-year program governed by burn-specific prescriptions. The Draft EA does not authorize indiscriminate ignition; it commits the agency to an **agency-approved Burn Plan** for every prescribed-fire action, with weather windows, smoke-management requirements, personnel and contingency standards, and avoidance areas determined burn-by-burn. The proper response to the possibility of a poorly-timed burn is to hold the agency to its Burn Plan and smoke-management commitments — not to abandon fuels reduction and accept the wildfire alternative.

If anything, the Helena example underscores why the design criteria in Appendix B matter and should be followed rigorously: split burn blocks to reduce short-term loading, active visual monitoring with authority to shut down operations, placement of smoke monitors in populated areas, and mop-up of nuisance smoke. BRC supports strict adherence to these measures.

III. UPHE’s Two Headline Studies, Read in Full, Support the Project

UPHE relies on two statistics. Both are real; both carry context that cuts against UPHE’s conclusion.

A. The “20,000 deaths, half from prescribed burns” figure is overwhelmingly a Southeastern phenomenon.

This figure comes from a 2017 national assessment (Carnegie Mellon researchers, published in *Communications Earth & Environment*, 2025). The study’s own geographic finding is decisive here: wildfire smoke damages are concentrated in the West, while the prescribed-burn share is **“mostly produced in” the Southeastern United States** — a region defined by frequent, low-elevation, high-frequency agricultural and pine burning conducted near dense populations. That fire regime bears no resemblance to a high-elevation Wasatch watershed burned in the fall and winter under a state-permitted smoke-management program. Citing the nationwide prescribed-burn death share to oppose a specific western watershed burn conflates two fundamentally different fire regimes.

B. The “five times higher per hectare” figure is an Australian study that found wildfires cause the overwhelming majority of total health costs.

This statistic traces to Borchers-Arriagada et al. (2021), a *Lancet Planetary Health* modeling study of New South Wales, Australia. Two points control its relevance. First, the per-hectare figure is an artifact of how prescribed burns are deliberately conducted **near population centers under calm conditions** — a management choice that increases per-hectare exposure precisely because it is controlled, not because the smoke is more dangerous. Second, and decisively, the same study found that **wildfires accounted for roughly 82% of total smoke-related health costs** across the study period. UPHE quotes the per-hectare ratio while omitting the study’s overarching conclusion that the uncontrolled wildfires prescribed burning is designed to prevent do the great majority of the damage.

In short, the literature UPHE invokes supports the proposition that planned, lower-intensity fire is the public-health-protective choice relative to the wildfire alternative — which is exactly the trade-off this Project makes.

IV. The Clean Air Act and Utah Smoke Management Program Are the Public-Health Safeguards

UPHE argues that no entity with “public-health expertise” was consulted. That mischaracterizes how prescribed-fire air-quality protection is structured. The public-health safeguard is not an advisory body — it is the regulatory framework the Draft EA already commits the Project to:

- **Clean Air Act conformity.** Under 40 C.F.R. § 93.153(c)(4), prescribed-fire actions that comply with an approved land-management plan and a certified state Smoke Management Program are presumed to conform, and are not subject to a separate conformity determination. The Draft EA documents that nearby PM_{2.5} and PM₁₀ areas are now in attainment or maintenance.
- **Utah Smoke Management Program.** The agency must submit every burn through the State smoke portal for approval and operate within UDAQ-stipulated conditions, in compliance with Utah Admin. Code R307-204 and R307-240. This includes annual scheduling, pre-burn registration, daily burn requests, and daily emissions reporting.
- **UDAQ as the air-quality authority.** The Utah Division of Air Quality — the State agency with precisely the air-quality and public-health mandate UPHE invokes — administers the permitting and smoke-clearance process. The agency cannot ignite without its approvals.

These are not aspirational. They are conditions precedent to ignition. UPHE’s comment treats the Burn Plan as a hand-wave; in fact the Burn Plan plus the SMP permitting process is the very mechanism that incorporates real-time air-quality and meteorological judgment into each burn.

V. The Herbicide and PFAS Concerns Do Not Match This Project

UPHE devotes substantial space to glyphosate, endocrine disruption, and PFAS contamination of pesticides. Whatever the merits of those concerns in the abstract, they are largely disconnected from what this Project proposes. The Draft EA’s noxious-weed component is

limited to hand pulling, spot treatment, roadside mowing, clipping, stem pulling, and targeted ground-based application — **not aerial or broadcast herbicide spraying**. Treatment is to be directed by a Forest Service botanist, conducted under the 2006 Wasatch-Cache Noxious Weed Treatment Program FEIS and ROD, and subject to the RHCA buffers in Appendix B, including the requirement that no fuel accelerants reach live water and that herbicide handling occur outside riparian buffers wherever possible.

BRC notes that Save Our Canyons — a conditional supporter of the Project — likewise asked the agency to formalize that broadcast herbicide spraying is excluded and to confine herbicide use to demonstrated necessity under Forest Service and Salt Lake City Public Utilities direction. BRC supports adding explicit EA language to that effect. Doing so both addresses UPHE’s stated concern and strengthens the administrative record by closing a gap that opponents might otherwise exploit. It does not, however, support UPHE’s implicit request to prohibit a tool the Project barely uses and that is essential to protecting the watershed from invasive species such as phragmites.

VI. Conclusion

UPHE’s comments do not identify a flaw in the Draft EA’s analysis or a basis for preparing an Environmental Impact Statement. They compare managed smoke to a clean-air baseline that does not exist in this canyon; they generalize from a single out-of-region burn; they cite studies whose full findings favor managed fire; and they raise herbicide concerns disproportionate to the Project’s limited, ground-based weed program. The Clean Air Act conformity presumption, the Utah Smoke Management Program, UDAQ permitting, and the Appendix B design criteria together constitute a robust, enforceable public-health framework.

BRC respectfully urges the agency to: (1) proceed with the Proposed Action; (2) adopt explicit EA language confirming that broadcast herbicide application is excluded and that herbicide use is limited to documented necessity under agency and SLCPU direction; and (3) reaffirm in its response to comments that every prescribed-fire action will proceed only under an approved Burn Plan and the certified State Smoke Management Program. These steps answer UPHE’s concerns on the merits and reinforce a record capable of withstanding review.

Respectfully submitted,
BlueRibbon Coalition
Pocatello, Idaho

Authorities and sources referenced

- 40 C.F.R. § 93.153(c)(4) (Clean Air Act general conformity; presumption for prescribed fire under approved plan and certified SMP).
- Utah Admin. Code R307-204 & R307-240 (Utah Smoke Management Program).
- U.S. EPA, Report Comparing Air Quality and Public Health Impacts from Prescribed Fire and Wildfire Smoke (2023).
- Communications Earth & Environment (2025) — national 2017 fire-smoke health-damage assessment (“20,000 premature deaths”; prescribed-burn share concentrated in Southeastern U.S.).
- Borchers-Arriagada et al., Lancet Planetary Health (2021) — NSW, Australia (per-hectare vs. total health-cost comparison; wildfires ~82% of total health costs).
- California PM2.5 modeling case study — ~52% emissions reduction under prescribed-burn vs. wildfire conditions.

- Big Cottonwood Canyon Watershed Restoration Draft EA and Appendix B (Design Criteria and BMPs), June 2026.