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October 20, 2020

Mark Boyle
Smoke Management Supervisor
DEQ Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Paula.wilson@deq.idaho.gov

Re: Docket No. 58-0101-1901 – *Rules for the Control of Air Pollution in Idaho – Prescribed Burning*

Dear Mr. Boyle:

The Nature Conservancy in Idaho (TNC) appreciates having opportunity to submit the following comments related to the Idaho Department of Environmental Quality's (DEQ) negotiated rulemaking on prescribed burning smoke management rules.

DEQ has outlined two goals for this rulemaking: "protect public health and provide flexibility to land managers to use prescribed fire as a management tool." DEQ also notes that "prescribed fire has long been used as a forest management tool in Idaho, and its use is expected to increase due to large wildfires becoming more frequent in the Western U.S." TNC wholly supports these objectives and emphasizes the important need to drastically increase the pace and scale of broadcast burning to manage our forest and rangeland systems across the state thereby limiting more severe public health impacts from wildfire smoke.

DEQ should acknowledge and weigh the avoided negative impacts to public health when increased use of broadcast burning improves forest health and reduces fuel loads and the threat of wildfire smoke. Landscape-scale prescribed burning efforts are critical to protecting human communities, wildlife habitat, water quality, and other ecological functions in addition to helping air quality. DEQ should acknowledge and make clear that balancing public health and the risk of wildfire means an increased amount of smoke in the air from prescribed burning treatments. This aligns with and supports both of DEQ's stated goals for this rulemaking. Under certain conditions, this may mean prioritizing broadcast burning over other types of burning (e.g. minor or short duration burning) as the burn windows for broadcast burning are much narrower.

Given the goals of this rulemaking, it remains unclear how DEQ is increasing flexibility for land managers and the use of prescribed fire through additional application and approval processes and by making a field guide available. It also remains unclear how new requirements will incentivize or encourage any change in practice at the critical time when closed fire season ends in October and all types of burning

increases. DEQ has cited this as a period of concern for public health, particularly in certain airsheds. Clearly and directly addressing both of these needs is imperative.

Ultimately, this rulemaking needs to address and balance—as best we can within the confines of the Clean Air Act—public health and the vital need for the expanded use of broadcast burning across the state. We look forward to engaging further with DEQ and other interested parties to accomplish this.

Thank you again for the opportunity to provide comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Ward', with a long horizontal flourish extending to the right.

Matthew Ward
The Nature Conservancy
Watershed Manager – East Idaho