

January 8, 2020

Thank you for the opportunity to provide comment on Docket 58-0101-1901 – *Rules for the Control of Air Pollution in Idaho*.

The Nature Conservancy (TNC) in Idaho believes it paramount to balance clean air and public health with the urgent need to increase prescribed burning on Idaho's forest lands. Increasing the pace and scale of prescribed burning will improve forest health and reduce the risk of uncharacteristic wildfire and significant associated smoke impacts.

Researchers and forest scientists have shown with growing clarity that in order to mitigate the severity and impact of future wildfires, we must have greater flexibility to implement prescribed fire treatments, particularly in high priority forested areas across the state. To achieve this desired outcome, *we need a smoke management regulatory framework that enables increased opportunity to implement prescribed burns*, while establishing innovative measures that address short-term air quality concerns and reduce the longer-term risks posed by wildfire. It remains unclear how this issue is being alleviated through the rule changes proposed to date, but TNC hopes it will be clearly addressed and articulated.

We appreciate the opportunity to participate in this rulemaking and appreciate DEQ taking our comments under advisement. We also look forward to reviewing the associated draft field guide to help bring more clarity to the full impacts of these rule changes.

Thank you,



Matthew Ward

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