June, 24, 2019

To: Idaho Dept. of Environmental Quality
Re: DEQ Negotiated Rulemaking - Rules for the Control of Air Pollution in Idaho/prescribed burning,  
    Docket No. 58-0101-1901

On behalf of the 470 businesses who are members of the Associated Logging Contractors (ALC) I am submitting these comments as part of the ongoing negotiated rulemaking process. The ALC is a trade organization in Idaho whose members are logging and hauling contractor businesses across the state. ALC members work in Idaho’s forests harvesting and hauling the raw material used to manufacture forest products. Our work entails slash management, which is required by Idaho law, which can include burning. We will remain vigilant and active throughout this process.

For today, I wish to ask for clarification on two items.

1. In DEQ’s powerpoint from the June 20, 2019 presentation there is a statement that indicates that reports have been made to DEQ with “concerns about the health impact caused from prescribed fire smoke.” What data does DEQ have that distinguishes “prescribed fire smoke” from that of wildfires or other fires?
2. What is DEQ’s definition of “prescribed fire”? What types of burning does this term contain? What are excluded?

We do intend to enter subsequent comments into the record as this process continues.

Thank you for your time and continuing outreach.
Sincerely,
Shawn
~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
Ms. Shawn Keough
Executive Director
Associated Logging Contractors, Inc. – Idaho
P.O. Box 671 | Coeur d’Alene, Idaho 83816
Office: 208-667-6473
shawn@idahologgers.com ~ www.idahologgers.com

It is okay to print this email. Paper is a plentiful, biodegradable, renewable, recyclable, sustainable, product from trees which provide jobs and income for millions of Americans.

From: Paula.Wilson@deq.idaho.gov <Paula.Wilson@deq.idaho.gov>
Sent: Monday, June 24, 2019 8:25 AM
To: alan.prouty@simplot.com; alabeau@iaici.org; alexis@usrtf.org; amichalski@greateryellowstone.org; amber.christofferson@dfm.idaho.gov; amber.rand@clearwaterpaper.com; andreab@nezperce.gov; andy@sawtoothlaw.com; aandrea@idl.idaho.gov; awalkins@idahoconservation.org; bdavenport@mineidaho.gov; bennb@strategies360.com; bzimmer@greateryellowstone.org; bjensen@idahofb.org; brent@mpidaho.com; ctanaka@sbtidaho.com; ckrries@kootenai.org; cbroncho@sbtidaho.com; clayton.steele@clearwaterpaper.com; courtney@cvidaho.org; dougz@co.nezperce.id.us; jake@wittmeyerassociates.com; jason.kesling.usrt@gmail.com; joeo@nezperce.org; jbell@idahocities.org; jeaton@iaici.org; airquality@nezperce.org; julies@nezperce.org; jhayes@idahoconservation.org; krinaldi@greateryellowstone.org; kbrassfield@idcounties.org; kenc@nezperce.org; Kevin.Booth@avistacorp.com; kkmcintyre@stoel.com; lhiggins@cdatribe-nsn.gov; lhowell@sbtidaho.com; megan.olsman@stoel.com; mgcowl.michael@epa.gov; nsemanko@parsonsbehle.com; ruddick.randall@epa.gov; sam.eaton@idaho.gov; greatsam@usdsf.gov; sfields@cdatribe-nsn.gov; scott.hauser@usrtf.org; sgrigg@idcounties.org; stcory@q.com; sbs@sbtidaho.com; zack.waterman@sierraclub.org; alistair@uidaho.edu; abrunelle@fs.fed.us; angela.kaufmann@ag.idaho.gov; Anna.Torma@PotlatchDeltic.com; bwagner@mccall.id.us; bunnasch@tnc.org; Brandon.Miller@PotlatchDeltic.com; Brian.Hobday@weyerhaeuser.com; bbohn@blm.gov; CMcelvany@molpus.com; cschnepf@uidaho.edu; darenturner@fs.fed.us; dhall@molpus.com; agricon@mtcom.net; emoe@hnrg.com; alle5110@vandals.uidaho.edu; elizabethb@achid.org; emily@rischpisca.com; Emily@mcclurepolicy.com; evan@epcosg.com; ghess@idl.idaho.gov; gburrhard@blm.gov; gjohnson@lewiscountryid.org; ivy@idahofirewise.org; jwensman@idl.idaho.gov; Jacob.Odekirk@PotlatchDeltic.com; edgecreek.funk@gmail.com; jfrance@molpus.com; jwithroe@centurylink.net; jillwebster@fs.fed.us; jelbin@idaho.gov; jim.riley@rileyandassociates.com; jadamski@blm.gov; jtrygh@gmail.com; jonathan.white@usda.gov; jharvey@idl.idaho.gov; kchandler@co.washington.id.us; kirkdavid@ Hughes.net; Kit.Hart@PotlatchDeltic.com; lchappell@fs.fed.us; lnewton@blm.gov; madelledavid@hughes.net; beartreetimber@gmail.com; mgbenton@centurytel.net;
Updates have been posted at www.deq.idaho.gov/58-0101-1901

Subject: DEQ Negotiated Rulemaking - Rules for the Control of Air Pollution in Idaho/prescribed burning, Docket No. 58-0101-1901

Status of Rulemaking
Negotiated rulemaking meeting August 1, 2019.
June 20, 2019 - Sign-in Sheets

Negotiated Rulemaking Meeting Schedule

*ORIGINATING LOCATION - LIVE MEETING*
DEQ State Office
Conference Center
1410 N. Hilton, Boise, Idaho

August 1, 2019, 9 a.m. to 12:30 p.m. MDT

Contact Paula Wilson by July 26, 2019, to make arrangements for participation by telephone and web conferencing.

*TELEPHONE AND WEB CONFERENCE LOCATIONS*

<table>
<thead>
<tr>
<th>Location</th>
<th>Address</th>
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<tbody>
<tr>
<td>DEQ Coeur d’Alene Regional Office</td>
<td>2110 Ironwood Parkway, Coeur d’Alene</td>
</tr>
<tr>
<td>DEQ Lewiston Regional Office</td>
<td>1118 F Street, Lewiston</td>
</tr>
<tr>
<td>DEQ Twin Falls Regional Office</td>
<td>650 Addison Ave. West, Suite 110 Twin Falls</td>
</tr>
<tr>
<td>DEQ Pocatello Regional Office</td>
<td>444 Hospital Way #300, Pocatello</td>
</tr>
<tr>
<td>DEQ Idaho Falls Regional Office</td>
<td>900 N. Skyline, Suite B, Idaho Falls</td>
</tr>
</tbody>
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Public Comment Opportunities
Submit all written comments by mail, fax or email to:
Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton, Boise, ID 83706
Fax: (208) 373-0481, paula.wilson@deq.idaho.gov

Draft Negotiated Rule and Meeting Presentations

<table>
<thead>
<tr>
<th>Draft Negotiated Rule and Meeting Presentations</th>
<th>Date Posted</th>
<th>Date of Meeting Discussion</th>
<th>Written Comment Deadline</th>
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<tbody>
<tr>
<td>Prescribed Fire Negotiated Rulemaking June 20, 2019 - DEQ PowerPoint Presentation</td>
<td>6/21/19</td>
<td>6/20/19</td>
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National Emissions Inventory (NEI)
The 2017 NEI has not been posted on the EPA website. The most recent NEI is for 2014.

Idaho DEQ’s Open Burning Map

Crop Residue Burning Operating Guide (This link is provided as an example of the type of information found in an operating guide.)