

**From:** [Jacob Odekirk](#)  
**To:** [Paula Wilson](#)  
**Subject:** Public Comment: SMP Rulemaking 5/10/2019  
**Date:** Tuesday, May 28, 2019 3:54:37 PM

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IDEQ,

Regarding the 5/10/2019 Prescribed Fire Rulemaking, there seems to be a fundamental disconnect between land managers and one of the current, basic goals of IDEQ's Smoke Management Plan (SMP). As presented on the 5/10/2019 rulemaking, one of the fundamental elements of the proposed SMP is "minimizing air pollutant emissions" (IDEQ presentation, slide 6), which contradicts the consistent message from land managers who have emphasized the need to conduct more prescribed burns. Fortunately, the basic element of the SMP can be modified to align more with IDEQ's mission and the goals of land managers.

A focus on *minimizing the impacts of air pollutants* aligns more consistently with IDEQ's mission "To protect human health...", which is a more effective air quality approach to smoke management. Although it seems like semantics, reducing air pollutants doesn't necessarily protect human health. On the other hand, following effective smoke management principles and BMPs can allow for more air pollutants to be properly dispersed, and therefore be more protective of public health. IDEQ's Crop Residue Burning Program is a prime example of this. More intensive smoke management (particularly the inclusion of meteorological spot forecasts and forecast validation) allow for fire to be a land management tool, while greatly minimizing any impacts to public health, and sensitive populations specifically.

In the interest of maintaining fire as a land management tool and protecting human health, I encourage IDEQ to take the more accurate stance of *minimizing the impacts of air pollutants* as a fundamental element of the proposed SMP. This doesn't prevent the reduction of air pollutants from appropriate BMPs (e.g., burn dry fuels, proper ignition, etc.), but it does allow for more prescribed fire if appropriate smoke management techniques and framework is employed. This will also give land managers the flexibility to employ prescribed fire through a smoke management framework to prevent and protect communities against non-anthropogenic sources of smoke (i.e., wildfire), which do not and cannot follow any smoke management principles.

Respectfully,

Jacob Odekirk