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To: [Paula Wilson](#)
Subject: Prescribed Burn Rulemaking
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Let me preface my remarks by announcing I am envious of the regulators! Who else can tap their cane hold out their hoop and have everyone line up to jump through it? We do get an opportunity to negotiate the size and height of the hoop.; burning or plain old wood. But jump we will or else be thrown out of the circus. Never mind if the hoop jumping is necessary or accomplishes the stated goal.

Now to the problem. Smoke is a pollutant. Smoke comes from burning wood and woody debris. The source of the smoke is two fold. 1.) Natural caused fire- wildfire and 2.) Man made fire- logging slash, or prescribed burning of natural debris. In case anyone is unaware natural fires occur during the drier warmer months of the year. Man made fires generally occur during the wetter cooler months. The EPA and DEQ cannot , as yet , control the natural fire and smoke emissions. Therefore they feel that reduction of the pollutants must come from the "prescribed " fires. Herein lies the catch. Too many regulations and restrictions on "prescribed" fire results in an increase of wildfire. **In short,you regulators, have to decide when and how you want your smoke.** We can suck smoke for weeks or months at a time during the summer, or get short, less intense, and more controllable doses during the spring and fall.

With your attempt at regulating prescribed burns you will increase the wildfires. Look at what smoke regulation has done for the Rathdrum Prairie. No more smoke from filed burning, but a complete loss of farms. And, what environmental damage results from subdivisions?

Rather than creating hoops for others to jump through; **I suggest you collaborate** with us in the timber industry and government burners to solve the problem. How about a mandate that a percentage of all electricity generated in Idaho has to come from slash? How about easing the permitting process of wood and slash fired cogen plants? How about grants for mulchers and chippers to reduce the slash without fire? How about government crews to be responsible for all slash burning in the State? How about coercing the IDL to negate the fire hazard reduction liabilities placed on all logging jobs? It is not mandatory to burn logging slash created in Washington, why should it be in Idaho? (After all we all know how progressive Washington State is). Look at what is happening in Arizona where the USFS and State are trying to reduce fire hazard in the woods, but no one else seems willing to help solve the problem. I can almost guarantee their forests will go up in smoke from wildfire before the problem is solved. We in Idaho do not have to be so stupid. Rather than throw sticks between the legs of those trying to reduce the fuel levels before it's to late why don't we get together and solve the problem by all giving something to the process. Further smoke regulations will only retard and complicate the solution.