

**From:** [Adamski, Joseph](#)  
**To:** [Bryce Bohn](#); [Glen Burkhardt](#); [Paula Wilson](#)  
**Cc:** [Andy Brunelle](#); [Jeff Withroe](#)  
**Subject:** ID DEQ Smoke Management Proposed Rulemaking: BLM draft Comments to date  
**Date:** Wednesday, July 31, 2019 9:26:13 PM  
**Attachments:** [BLM Forestry Smoke Management Comments 07312019.docx](#)

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Hello -

I will not be able to attend the AUG 1 ID DEQ Smoke Management Meeting

Here are thoughts I would like to share.

I do not believe DEQ is on the best path forward (and suggest several course corrections in attachment)

Major Concepts:

- 1) Goal is Smoke Management rulemaking (not forest operations or RXB (prescribed fire operations ) rulemaking)
- 2) Suggest ID DEQ tier more closely with existing Idaho Forest Practices Act concepts and terminology, aka "FOREST PRACTICE".

Hope the meeting goes well. Thanks for representing forest management.

- joe

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1976 Federal Land Management Policy Act .... "a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources , including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values."

Smoke Management Comments 07312019

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RE: Comment: **Preliminary Draft Negotiated Rule (Draft No. 1)**  
**Docket No. 58-0101-1901, Dated July 25, 2019**  
**Written comment deadline for this draft – August 30, 2019**  
**Rules for the Control of Air Pollution in Idaho**  
**IDAPA 58.01.01**

Ms. Wilson,

As I am not able to attend the August 1, 2019 meeting please accept these comments in the spirit of improving the Idaho DEQ Prescribed Fire Smoke Management Rule:

- 1) Proposed 006 General Definitions: **“XX. Burn Boss.** The individual who is onsite throughout the entire prescribed fire and who has the overall responsibility for the entire burn.”

*Suggest this is not the best definition. It is not uncommon for a “Burn Boss” not to be present throughout the entire duration of the prescribed fire; particularly in instances of low temperatures and high relative humidity (precipitation) when a land manager may be igniting one or more hand piles, mechanical piles, and or landing piles throughout numerous forest treatment areas / forest operation areas, across one or more watersheds, across one or more townships. These (mechanical, and/or landing) piles may burn for several days or weeks.*

*Suggest DEQ consider definitions adopted by Oregon Department of Forestry as described in Oregon Revised Statutes, OAR 629-048-0001 through 629-048-0500 known as the Smoke Management rules- 629-048-0005 , Definitions :*

*(3) “Burn boss” means the person, authorized by the owner (may include the owner) or a federal land management agency to conduct and make decisions regarding the practices involved in conducting a prescribed burning operation and who is responsible for compliance with all requirements under this rule division and related laws.*

- 2) Proposed 006 General Definitions: **91. Prescribed Fire Management Burning.** “The controlled application of fire to wildland fuels in either their natural or modified state under such conditions of weather, fuel moisture, soil moisture, etc., as will allow the fire to be confined to a predetermined area and at the same time produce the intensity of heat and rate of spread required to accomplish planned objectives, including: (5-1-94)
- a. Fire hazard reduction; (5-1-94)
  - b. The control of pests, insects, or diseases; (5-1-94)
  - c. The promotion of range forage improvements; (5-1-94)
  - d. The perpetuation of natural ecosystems; (5-1-94)
  - e. The disposal of woody debris resulting from a logging operation, the clearing of rights of way, a land clearing operation, or a driftwood collection system; (5-1-94)
  - f. The preparation of planting and seeding sites for forest regeneration; and (5-1-94)
  - g. Other accepted natural resource management purposes. (5-1-94) “

***Suggest DEQ consider changes:***

- I) ***Change*** “The controlled application of fire to wildland fuels in either their natural or modified state under such conditions of weather, fuel moisture, soil moisture, etc., as will allow the fire to be confined to a predetermined area and at the same time produce the intensity of heat and rate of spread required to accomplish planned objectives, including: (5-1-94) “ .....” ***to ‘The controlled application of fire to FORESTLAND (see Idaho Forest Practices Act for definition of forest land) to accomplish planned objectives, including: (5-1-94)’***
- II) ***Change the objectives to include the addition of objectives listed below that are also identified in the Oregon Department of Forestry Directive 1-4-1-601, OPERATIONAL GUIDANCE FOR THE OREGON SMOKE MANAGEMENT PROGRAM p.1 :***
- A. Minimize smoke emissions resulting from prescribed burning.....***
  - B. Provide maximum opportunity for essential forestland burning;***
  - C. Protect public health by avoiding intrusions;***
  - D. Coordinate with other state smoke management programs;***
  - E. Comply with state and federal air quality and visibility requirements; and***
  - F. Promote the further development of techniques to minimize or reduce emissions by encouraging cost-effective utilization of forestland biomass, alternatives to burning, and emission reduction techniques.***

- III) **Change** “a) Fire Hazard Reduction”, to  
     ‘a) *Hazard Reduction, and the reduction of “Additional Hazard”, “Fuel Quantity”, and “Hazard” as defined in the Idaho Forest Practices Act.*
  
- IV) **Change** “e. The disposal of woody debris resulting from a logging operation, the clearing of rights of way, a land clearing operation, or a driftwood collection system; (5-1-94) “ to  
     ‘e. *The disposal of Hazard from a Forest Practice as defined in the Idaho Forest Practice Act. (A Forest Practice includes, among other operations, the harvest of tree species, road construction and re-construction, re-forestation, and the management of slash resulting from harvest, management or improvement of forest tree species or the use of prescribed fire on forestland)*
  
- V) **Suggest delete line “f”**

- 3) Proposed 006 General Definitions: **113. Smoke Management Program.** ”A program or system whereby meteorological information, fuel conditions, fire behavior, smoke movement and atmospheric dispersal conditions are used as a basis for scheduling the location, amount and timing of open burning operations so as to minimize the impact of such burning on identified smoke sensitive areas populations and to ensure smoke impacts do not cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS) in order to protect public health.”

*Suggest DEQ consider changes:*

*113. Smoke Management Program: A Plan to meet air quality standards, to maintain a satisfactory atmospheric environment in Smoke Sensitive Receptor Areas and other areas sensitive to smoke , and to meet additional objectives stated within; upon monitoring weather and air quality conditions placing restrictions on prescribed forestland burning through issuance of Smoke Management instructions by the State in order to limit the amount of particulate matter that is released into the airshed.*

(see Oregon Department of Forestry Smoke Management Directive)

