

From: [Burkhardt, Glen](#)
To: [Paula Wilson](#)
Subject: Comments for August 30 2019 deadline
Date: Wednesday, August 28, 2019 3:54:55 PM
Attachments: [GB Smoke Management Comments 7292019.docx](#)

Ms. Wilson, I appreciate the chance to comment on the proceedings thus far. Attached, you will find some suggestion for the process to consider. Thanks, Glen

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Smoke Management Comments 7-29-2019

To: Ms. Paula Wilson
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**RE: Comments on: 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,

I am not able to attend the August 1, 2019 meeting, but, I am sending these comments to be included in the Idaho DEQ Prescribed Fire Smoke Management Rule Set:

- 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.”

Recommendation 1, GB: Prescribed Fire Burn Boss: (RXB1/RXB2/RXB3) is responsible to the agency administrator, prescribed fire manager, fire management officer or local fire management organization for implementing the prescribed fire plan. (NWCG, Interagency Prescribed Fire Planning and Implementation Procedures Guide, July 2017 PMS 484).

- 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) “

Recommendation 2, GB: *Prescribed Fire*: As one component of fire management, prescribed fire is used to alter, maintain, or restore vegetative communities; achieve desired resource conditions; and to protect life, property, and values that would be degraded or destroyed by wildfire. (NWCG, Interagency Prescribed Fire Planning and Implementation Procedures Guide, July 2017 PMS 484).

- 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.”

Recommendation 3, GB: 113. Smoke Management Program : A collaborative, group effort to implement Basic Smoke Management Practices (BSMPs) to prescribed fire activities to mitigate the impacts of smoke to public health, public safety, nuisance, and visibility standards