



OFFICE OF
BOARD OF COUNTY COMMISSIONERS
ADAMS COUNTY
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COUNCIL, IDAHO 83612



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September 18, 2023

Linda L. Jackson
Payette National Forest Supervisor
500 N. Mission St., Bldg 2
McCall, ID 83638-3805
Via Email: linda.l.jackson@usda.gov

RE: Urgent Formal Objection to Implementation of Prescribed Burn Plans on PNF within the Boundaries of Adams County Per Insufficient Errata to Justify any Finding of No Significant Impact leading to a NEPA Defined Categorical Exclusion for Prescribed Fires in 2023

Dear Forest Supervisor Jackson:

Thank you for your continued cooperation in working with the Adams County Board of Commissioners to improve our understanding of one another's mutual interests in "caring for the land and serving people". We intend to continue to encourage the engagement of our Adams County residents in proposed federal lands and resources decision making as we restore public involvement and provide Adams County Board of Commissioners' substantive comment to you.

In that spirit, in May of this year our Board requested information about what type of environmental analysis was done to determine your Payette Nation Forest ("PNF") Prescribed Burn Policy and Plan this season. We received your response in late July. This information helped us understand when and if any environmental impact analysis took place documenting conditions on the ground and potential impact to people and the interdisciplinary resources the Forest Service is mandated to consider before taking any action including prescribed fire ignitions and subsequent Decision Notices.

We have had time to review the documentation your Staff provided pursuant to Forest Planning and National Environmental Policy Act ("NEPA") and have found dire insufficiencies to support a Finding of No Significant Impact ("FONSI") and Categorical Exclusion ("CEX") from doing further Environmental Impact Analysis regarding the 2023 Prescribed Burn plan within Adams County. Therefore, we require the immediate postponement of prescribed fire ignitions until there is documentation of interdisciplinary

analysis of effects on people and all natural resources is transparently provided to us and to the public.

Without such, the United States Forest Service and the County cannot assure that these prescribed burns do not threaten the health, lives, properties and livelihoods of Adams County people and visitors. We and the public cannot ascertain the risk to wildlife, habitat, recreational use and the overall active interdisciplinary resource management of the PNF lands within Adams County. In a FONSI, a full NEPA analysis, County and public involvement can be circumvented. In this case, County, and public involvement in the decision to ignite prescribed burns in 2023 is imperative.

In reviewing the 2022 prescribed fire and wildland fire season, we learned that we cannot appeal a Categorical Exclusion for a prescribed burn that has been ignited after the fact. We have written this letter to officially document our finding of insufficient errata or information to justify a FONSI and the use of a CEx in your current prescribed Burn Plan for 2023 in Adams County.

To be clear, effective today we demand that no further ignitions take place on the PNF in Adams County until we receive the sufficient documentation of potential beneficial and adverse human and environmental impacts analyzed for each specific burn that is planned. The Adams County Board of Commissioners unequivocally reject the use of a FONSI and a CEx in igniting prescribed burns. We demand the required environmental and associated analysis and current documentation/errata of potential positive and adverse impacts of these prescribed burns be provided to our Board and to the public as federally mandated in your Agency's Code of Federal Regulations and NEPA.

The Idaho Congressional Delegation has been copied in this demand letter to document the insufficiencies we have found in the errata you provided to justify no further NEPA analysis of potential impacts on people and the environment in your plan to burn thousands of acres on the PNF in Adams County. We request the respect of your acknowledgement of our demand per this official and timely challenge to the use of Categorical Exclusions per NEPA.

We clearly intend to effectively stop all further prescribed burns until the use of a FONSI and Categorical Exclusion are substantiated or adequate NEPA analysis is completed. Thank you.

Respectfully,

Board of Adams County Commissioners



Joe Iveson, Chairman

CC: US Congressman Russ Fulcher
US Senator Mike Crapo
US Senator James E. Risch
District Ranger Dana Harris