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Comments: The State, through the Idaho Governor's Office of Species Conservation (OSC), appreciates this opportunity to provide comments on the Sawtooth National Forest's (SNF) Prescribed Fire Project EA. The State provided comments during the scoping period earlier this year that included increased coordination with relevant State agencies to help with site specific planning for fish and wildlife, recreation, post implementation monitoring, as well as a 2 [ndash] 3 weeks notice before implementation to provide the public sufficient notice of closures and burn sites. The State continues to support improving firefighter and public safety, reducing fuel accumulations, increasing resiliency of existing vegetation groups, and improving watershed conditions, proper ecological functions, native vegetation communities and wildlife habitats.

The SNF is taking a proactive step with the strategic and programmatic approach of the Proposed Action for prescribed burning, which has the potential to create a landscape-scale tool to actively manage forest resources when properly planned and implemented at the site-specific scale. A preapproved programmatic process also increases the likelihood that a prescribed fire project can be safely, effectively, and expeditiously implemented during appropriate and often rapidly changing environmental conditions.

The State would like to re-iterate the importance of communicating frequently with neighboring National Forests within Region 4, Idaho Department of Environmental Quality (DEQ), and the Montana Idaho Airshed Group (MIAG) to address smoke management. It is anticipated it would take 5 to 10 years to develop the capacity to increase the scale, but when fully implemented, treatments would not exceed 40,000-acres of prescribed burning annually. This combined with neighboring Forest's implementation of large scale prescribed burning plans creates a significant increase in smoke emissions and further illustrates the importance of inter-region coordination between state and federal partners.

The following comments were developed in coordination with the Idaho DEQ, Idaho Department of Fish and Game (IDFG), Idaho Department of Parks and Recreation (IDPR), Idaho Department of Lands, Idaho Department of Water Resources, Idaho State Department of Agriculture, and the Governor's Office of Energy and Mineral Resources.

Smoke Management

Reference: Proposed Action, pg. 4

Comment: While the State is supportive of the increased use of prescribed burning as a forest management tool, the State is also concerned with increasing the acres burned in the SNF to 40,000 acres/year without specifically addressing the USFS operational commitment to the MIAG. As the use of prescribed fire increases, smoke management resourcing must also expand accordingly. SNF's increased acre/year represents a 70% increase to the total statewide 4-year average of acres of prescribed fire burned by all MIAG members combined. The State understands other federal, state, and private land management entities are also anticipating increasing burning capacity which, together with SNF increases, will easily more than double the number of acres treated with prescribed fire in Idaho over the next several years. Recognizing that the goal of the increased use of prescribed burning is to improve forest health and help limit the number of catastrophic wildfires, thus reducing overall smoke long term, it will still be vitally important for federal, state, and private land managers to communicate with each other and address the increased levels of smoke resulting from increased prescribed fire use.

Reference: Fire, Fuels and Air Design Elements, pg. 49 - 50

Comment: To protect air quality assets, public health, and long-term community vitality the SNF should commit to

monitoring of smoke impacts in downwind communities during large multi-day burn projects to aid burn decisions and provide information to support future burn plan development. Resourcing air quality surveillance is a critical part of smoke management commitments.

Reference: Clean Air Act, pg. 28

Comment: The author is correct that the MIAG is relied on in Idaho for smoke management decisions for forest service burning and other landowners in Idaho however, the author's interpretation that suggests DEQ is not the delegated air quality management authority in Idaho is inaccurate. The State of Idaho maintains authority for air quality protection in Idaho. The MIAG is a voluntary smoke management burn approval and reporting process which DEQ, and many prescribed fire practitioners, currently rely on to implement several basic smoke management practices while Idaho works to develop a smoke management plan as required by state rule.

#### Wildlife

The State (IDFG, OSC, etc.) is available to provide technical assistance to support development of future site-specific projects and burn plan preparation under the Proposed Action to help proactively, efficiently and collaboratively incorporate priority fish and wildlife species, habitats (e.g., aspen communities with conifer encroachment), areas for prescribed burning, and avoid adverse fire effects on important wildlife habitats (e.g., greater sage-grouse habitats and big game winter range).

The following are IDFG site-specific project planning priorities that the SNF should consider when planning prescribed burns:

1. Cautious application of prescribed fire in sagebrush communities to ensure protection of sage-grouse habitats and big game winter range.
2. Enhancement of big game habitats with prescribed fire (e.g., prioritization of prescribed burning in aspen communities with conifer encroachment, protection of mountain mahogany communities from fire damage, avoidance of adverse fire effects to sagebrush winter range, etc.) See IDFG's 2019 Idaho Mule Deer Management Plan: 2020–2025.
3. Identification of opportunities as appropriate and practical to minimize potential effects of prescribed fire on fish and wildlife related recreation (i.e., hunting, fishing, and trapping).

Reference: Whitebark Pine (ST 1-2), pg. 64 - 65

Comments: The Proposed Action is expected to harm whitebark pine; for example, trees could be killed or damaged by fire and fire line construction (see DEA Page 20). The State therefore recommends that prescribed burning that would implement moderate or high intensity burns be planned and implemented cautiously to minimize adverse effects on whitebark pine and emphasize protection of all live whitebark pine trees (e.g., appropriately sized protective buffers based on site specific conditions) to avoid take of a species currently proposed for protection under the Endangered Species Act (ESA).

State Consultation Reference: Section III Notifications and Consultations, pg. 78

Comment: Please include DEQ smoke management, Region 1 and Region 4 USFS Air Quality staff, and MIAG participation in annual external consultation and collaboration as early as possible so that smoke management support can be promptly provided for this important project.

Reference: Section III Notifications and Consultations, C pg. 78, Section V Implementation, pg. 79 Comment: As written, notification of IDFG appears to be optional with the use of "may notify or coordinate with Fish and Game" Notification to IDFG is critical to facilitate effective coordination among agencies and affected parties. Ample notification to IDFG regional offices of planned prescribed fires (e.g., locations, timeframes, access closures, etc.) would enable effective communications with potentially affected public constituents. Therefore, please provide all relevant IDFG regional offices with advance notice (e.g., 2-3 weeks preferably) of scheduled prescribed fires to facilitate IDFG communications and responses to public inquiries as

might be appropriate for potentially affected fish and wildlife related recreation on the SNF (i.e., hunting, fishing, and trapping).

Reference: Section III Notifications and Consultations, B3 pg. 78

Comment: Game should be capitalized in [Idaho Department of Fish and game.] IDPR should stand for Idaho Department of Parks and Recreation.

Footnotes:

1 (Memorandum of Understanding for Cooperative Smoke Management in Montana and Idaho - DEQ, USDA, et al. 2007).

2 <https://idfg.idaho.gov/sites/default/files/plan-deer-mule-2020-25.pdf>