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United States Department of Agriculture

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Submitted via: <https://cara.ecosystem-management.org/Public/CommentInput?Project=56983>

RE: Proposed Amendment to the Tahoe National Forest Land and Resource Management Plan

Mr. Ilano:

The Placer County Air Pollution Control District (District) appreciates the opportunity to comment on the Forest Plan 1990 project, an important project to expand opportunities for using naturally ignited wildfires on Tahoe National Forest - National Forest System lands. District staff have reviewed the documents available online and have the following comments and concerns as it relates to the proposed amendment.

1. On the California Air Resources Board's (ARB) website is the Coordination and Communication Protocol for Naturally-Ignited Fires (<https://ww3.arb.ca.gov/smp/nif/nif.htm>). This document was revised in 2011 by the ARB, Federal Land Management Agencies and Local Air Districts in California. The Protocol is an agreed upon framework that for a naturally ignited fire, smoke and emission impacts will be minimized by providing the coordination process between the District and the Land Manager - Tahoe National Forest staff. District staff will use this document in the event a fire does occur and is to be managed.

2. Placer County Air Pollution Control District Rule 303 Prescribed Burning Smoke Management, Subsection 306.7 provides information on Naturally-Ignited Burns for Resource Benefits. While this term has changed over the years, for this type of burning and it is now called Managing Fire for Multiple Resource Benefits under the Forest Plan proposal, the rule information below is applicable for Placer County. Consultation with other air districts within the Tahoe National Forest boundaries should be done to find out their requirements.

306.7 Naturally-Ignited Burns for Resource Benefits: When a natural ignition occurs on a no burn day, the initial "go/no-go" decision to manage the fire for resource benefit shall be a "no-go" unless:

306.7.1 After consultation with the appropriate land manager, the District determines, for smoke management purposes, that the burn can be managed for resource benefit; or

306.7.2 For periods of less than 24 hours, the land manager has made a reasonable effort to contact the District, or if the District is not available, the ARB.

306.7.3 After 24 hours, the land manager has made a reasonable effort to contact the District, or if the District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit.

A "no-go" decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be

considered as a prescribed fire. Placer County APCD Smoke management plans shall be submitted within 72 hours of the start of the fire for naturally ignited wildland fires managed for resource benefits that are expected to exceed 10 acres in size.

The submittal of a smoke management plan will also include possible air monitoring along with a commitment to work with local agencies on collaborative outreach to the public regarding smoke.

The District recommends that in the discussion the coordination on the preparation and submittal of a smoke management plan. This would include mentioning the three air districts that work with the Tahoe National Forest.

The District appreciates the good working relationship with the Tahoe National Forests staff on prescribed fire projects and looks forward to working with you with regards to this project.

Cordially,

Ann Hobbs
Associate Planner