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Comments: The State, coordinated through the Idaho Governor's Office of Species Conservation (OSC), appreciates the opportunity to provide comments on the United States Forest Service (USFS) proposal for the Payette National Forest Resilience and Fuels Reduction Prescribed Fire Project. Idaho has felt the effects of large-scale wildfires through the damage of human infrastructure, recreation opportunities and infrastructure, water quality, wildlife habitat and other resources. According to the scoping document, the LANDFIRE models characterize over 56 percent of the Payette National Forest as being highly departed from the historic fire regime, highlighting the ongoing risk to resources on the forest.

This project looks to expand management actions including prescribed burning, hand thinning, and mechanical thinning on a maximum acreage of 30,000 acres per year over the next 20 years. The State appreciates the Payette National Forest for 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.

OSC is dedicated to planning, coordinating, and implementing actions within the State of Idaho that will preserve, protect, and restore species listed as threatened, endangered, or candidate while taking into consideration the state's economic vitality and values. If you or your staff have any questions regarding these comments, please contact my Federal Lands Coordinator, Jace Hogg.

The following comments were developed in coordination with the Idaho Department of Parks and Recreation (IDPR), Idaho Department of Environmental Quality (IDEQ), Idaho Department of Fish and Game (IDFG), and Idaho State Department of Agriculture (ISDA).

Recreation Monitoring

Pursuant to precedent and cooperative agreement between IDPR and FS to assist in maintaining motorized trails across Idaho for public access, IDPR pledges its continued commitment to assisting FS with any post-prescribed-burn trail maintenance activity necessary to restore and improve public access to motorized trails and to protect resources.

Reference: Pretreatment Actions [ndash] pg. 10

Comment: The Forest should consider adding the following to their pretreatment action items: determine whether the area contains any motorized trails, then inspect and clean out any water control devices before the prescribed burn is implemented. This will help protect the trail tread from post-burn water damage and proactively mitigate possible run-off siltation issues.

Reference: Post Treatment Actions [ndash] pg. 10

Comment: The Forest should consider adding the following to their post treatment action items: Re- inspect any motorized trails in the burn area for any changes in condition of water control devices or damage to wood structures such as bridges and signage. Document and seek assistance of trail maintenance partners in any remediation necessary for protection of trails, and for trail user satisfaction and safety.

Smoke Management

Coordination efforts between Payette NF and the State of Idaho Air Quality Planning Bureau Smoke Management Program should be pursued before implementing this project to meet IDAPA 58.01.01.614.01.b

requirements. This rule directs DEQ to pursue an interagency agreement with all federal land management agencies to assure all federal burn plans provide adequate consideration for controlling smoke from all federal prescribed burning.

Reference: [ldquo]After the application of prescribed fire, post-treatment monitoring would occur, and based on certain conditions, additional follow-up actions may be triggered.[rdquo] [ndash] pg. 10

Comment: To avoid potential environmental impacts of excessive smoke related to the proposed action Payette NF should consider the following:

- * Identify locations where [ldquo]real-time[rdquo] reporting smoke monitoring instruments should be deployed by the forest to help avoid excessive smoke buildup, inform burn approval decisions, evaluate implementation successes, and advise future improvements to smoke management practices. DEQ is available to assist in identifying pertinent monitoring locations.

- * Identify burn techniques or conditions that will be used for protecting against risks from the accumulation of excessive air pollution impacts from prescribed fire to such a degree to prevent public nuisance and meet State and Federal air quality and visibility standards (Memorandum of Understanding for Cooperative Smoke Management in Montana and Idaho - DEQ, USDA, et al. 2007). The techniques or conditions should specifically address but not be limited to avoiding smoke impacts to the cities of: McCall, Donnelly, Cascade, New Meadows, and Council.

Reference: [ldquo]In the context of this proposed action, treatments include not only the type of fire applied to achieve an objective, but also the pre-fire actions, also known as burn preparation, needed to facilitate the application of fire.[rdquo] [ndash] pg. 6

Comment: The Forest should consider how alternative fuel treatments can be included in this plan to meet the goals for this project. It is unclear why the fuel reduction project is being limited to prescribed fire use only when alternative fuel reduction treatments (in-place mastication, biomass collection and utilization, etc.) used in combination with prescribed fire would appear to help Payette NF consistently move conditions on the ground toward desired conditions as specified in the forest plan. Alternative treatment methods used in combination with prescribed fire could potentially reduce overall costs and reduce the frequency of repeated treatments (B.R. Hartsough et al. / Forest Policy and Economics 10 (2008) 344[ndash]354).

Reference: [ldquo]This proposed action does not apply to congressionally designated wilderness areas, Research Natural Areas, or select project areas considered by previous National Environmental Policy Act decisions.[rdquo] [ndash] pg. 6

Comment: Potential additional prescribed fire activity in the area, already covered by previous NEPA decisions or currently in an active review, may contribute to a cumulative effect with the proposed action. Prescribed fire smoke emissions from this project could potentially jeopardize attainment of National Ambient Air Quality Standards and affect public health in general if cumulative effects with other projects are not considered. Please consider how prescribed fire planning and implementation for this project will be used to avoid negative cumulative effects from other NEPA projects which include prescribed fire use that may be occurring concurrently such as the Railroad Saddle Project, Cold July Project, Brush Mountain Ecosystem Maintenance Burn, and others.