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Organization: EPA

Title: Chief, Policy and Environmental Review Branch

Comments: Dear Patrick Schon:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's September 202. Payette National Forest Resilience and Fuels Reduction Prescribed Fire Project Environmental Assessment (EPA Project Number 23-0044-USFS). EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on proposed federal action subject to NEPA's environmental impact statement requirement. The EA evaluates the potential environmental impacts associated with prescribed burning, hand-thinning, and mechanical thinning across the proposed treatment area up to 30,000 acres per year on Payette National Forest in central western Idaho. The EA identifies and evaluates the no action alternative and the Proposed Action. EPA acknowledges the benefits of fuels reduction work for forest health, ecosystem services protection and high-severity fire reduction. We also recognize that prescribed fire itself can be a public health if communities are exposed to unhealthy levels of smoke. EPA has concerns about potential air quality impacts resulting from prescribed burning to nearby communities. EPA notes the importance of reducing smoke impacts by coordinating with Idaho Department of Environmental Quality, adhering to the Idaho Smoke Management Plan, and ensuring surrounding communities are well informed and smoke ready by working with local environmental groups and/or developing a robust community outreach plan. We note that community members in wildfire-prone areas may experience mental health impacts and stress resulting from extended periods of hazardous air quality from wildfire smoke. After these life-disrupting experiences, any amount of smoke, including from prescribed burns, may cause stress to communities. Outreach is especially important to these communities to alleviate stress of impaired air quality. We recommend developing outreach strategies to inform communities of the benefits of prescribed burns, provide notifications of when burns are occurring, and assist communities with mitigation techniques to reduce their exposure to hazardous air quality. EPA appreciates the two mapping tools available to the public to learn more about fuels treatments Payette National Forest Planned Fuel Treatment Areas Map¹ and the Southwest Idaho Interagency Treatments Map/ Information website.² EPA did not find current programs in place to reach the public for smoke preparedness prior to a burn. We recommend the NEPA analysis for this project discuss the outreach approach to specific communities that may be impacted by impaired air quality. Both notification and information on smoke readiness are important. EPA's resource, "Smoke ?? Toolbox for Wildfires,"³ may be helpful. Thank you for the opportunity to review the EA for this project. If you have questions about this, please contact Scott Campbell of my staff at 206-553-6349 and campbell.scott.w@epa.gov, or (206) 553-1774 or at chu.rebecca@epa.gov. Sincerely, Rebecca Chu, Chief Policy and Environmental Review Branch

FOOTNOTES:1 <https://usfs.maps.arcgis.com/apps/instant/sidebar/index.html?appid=c::Q8c46725b2264c99b3096b00d014b909,/waccess,10/24/2023>.2 <https://usfs.maps.arcgis.com/apps/MapSeries/index.html?appid=3fbf1.2463b7c442e85401Oe203800d48>. Acee, J., 10/24/2023.3 <https://www.cpa.gov/srnokc-rcady-toolbox-wildfires>, Accessed 10/24/2023,