



Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

Wildfire Management Plan Environmental Assessment

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) applauds the U.S. Department of Energy's Idaho Operations Office for initiating preparation of environmental documentation to support decisions related to a Wildfire Management Plan. The entire 894 square miles of high desert sagebrush steppe that lies within the INEEL boundaries is a precious resource. We appreciate recent efforts to manage that resource in the most responsible manner.

The following recommendations are submitted as scoping comments for consideration during the development of the draft Wildfire Management Plan Environmental Assessment (EA).

1. The INEEL CAB recommends that the description of the "existing environment" in the EA fully describe the characteristics of the site that could be impacted by wildfire on the INEEL and/or wildfire management operations, including fuel management, wildfire prevention, wildfire suppression, and wildfire rehabilitation. (New information may not necessarily be required for this EA if existing plans or documents are referenced.) Information presented in or identified by the Draft EA should include, as appropriate:
 - Descriptions and locations of onsite facilities and infrastructure,
 - Descriptions and locations of cultural resources,
 - Descriptions and locations of natural resources and key habitat areas, and
 - An assessment of fuel levels across the entire site.
2. The INEEL CAB recommends that the descriptions of key habitat areas in the EA include an evaluation of the ecological condition of each using a methodology that is consistent with methods employed by land management agencies.
3. The INEEL CAB recommends that the description of the proposed action, no-action alternative, and other reasonable alternatives to be evaluated in the EA include complete descriptions of all fuel management, wildfire prevention, wildfire suppression, and wildfire rehabilitation measures that may be employed if the alternative were selected as the preferred alternative. Descriptive information for the assessment and evaluation should include:
 - An explanation of how fuel levels would be measured and managed across the site with particular attention to key habitat areas, including:
 - An explanation of how weed control measures would be used to contribute to fire prevention efforts,
 - An explanation of how and where prescribed fire may be used (if included in proposed or alternative actions) and descriptions of what measures would be taken to protect key habitat areas during implementation of prescribed fire, and

- An explanation of how fuel management activities would be implemented to minimize impacts on important natural resources and designated key habitat areas;
 - An explanation of how and where wildfire prevention measures (including fire breaks) would be used, species that would be used for greenstripping, and measures that would be taken to minimize impacts on important natural resources and designated key habitat areas;
 - An explanation of wildfire suppression measures that might be used, how and where they might be implemented, and measures that would be taken to minimize impacts on important natural resources and designated key habitat areas;
 - An explanation of wildfire rehabilitation efforts that could be implemented in areas already burned and in areas affected by future wildfires; and
 - Locations of areas where fuel management, wildfire prevention, and wildfire suppression activities should **not** occur in order to allow natural fire cycles and reduce fuel build-up.
4. The INEEL CAB recommends that the description of each alternative evaluated in the EA include information regarding the nature of interagency agreements that would be necessary to support smooth and consistent implementation (including explanations of funding for such agreements) OR should describe how INEEL will fund and implement described activities without the support or cooperation of other land management agencies and/or other agencies for all described activities (fuel management, fire prevention, fire suppression, and fire rehabilitation).
 5. The INEEL CAB recommends that the impacts from the proposed action, no-action alternative, and other reasonable alternatives evaluated in the EA include the same aspects described in the "Existing Environment" section (see #1, above).
 6. The INEEL CAB recommends that DOE coordinate the collection and evaluation of data for the EA with relevant technical experts at the Bureau of Land Management, the Shoshone-Bannock Tribes, and other appropriate entities.
 7. The INEEL CAB recommends the development of a fire rehabilitation plan for interagency and public review following significant wildfire events on the site. Each plan should outline resource restoration measures, including fences, reseeding, roads, firebreaks, and other disturbed areas as well as rehabilitation of plant communities, etc.