



**Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory**

**Draft Idaho National Engineering and Environmental
Laboratory Wildland Fire Management
Environmental Assessment**

The Idaho National Engineering and Environmental (INEEL) Citizens Advisory Board (CAB) received and reviewed the Draft INEEL Wildland Fire Management Environmental Assessment (EA). This recommendation addresses our comments to the U.S. Department of Energy's Idaho Operations Office (DOE-ID) on the Draft EA. As evidenced by our comments during the scoping period for this EA, the INEEL CAB is interested in this document and its implications for management of the natural resources within the INEEL boundaries.

We recently received the Bureau of Land Management (BLM)'s Public Scoping Document and Draft Management Plan for the Sagebrush Steppe Ecosystem Reserve on the INEEL. The BLM document covers other topics besides wildland fire: relevant sections deal with roads (page 6) and wildfire management (page 14).

The draft EA is a very detailed and comprehensive document and the CAB compliments DOE-ID on a careful study of the problems, issues, and possible alternatives. We do not feel qualified to evaluate all the aspects of fire prevention, fire suppression, and post-fire restoration in detail. Our comments address more general policy issues.

The Draft EA presents three alternatives (in addition to the mandatory "no action" alternative). The following is our understanding of the essence of these three alternatives.

1. **Maximum Fire Protection Approach.** The goal of this approach would be to put out any wildfires as quickly as possible, using all fire-suppression tools that are available. In some cases, this could result in significant impacts on the sagebrush steppe, wildlife, and Native American cultural interests. It would usually result in the least amount of land actual burned.
2. **Balanced Fire Protection Approach.** The goal of this approach would also be to put out any wildfires quickly, but to do so with minimum impact on the ecosystem, using minimum impact suppression tactics (MIST). While a larger area of land would likely be burned, the unburned areas would be less affected by fire suppression activities and restoration of the burned areas would be easier.
3. **Protect Infrastructure and Personal Safety Approach.** This approach would let wildfires burn themselves out when possible, thereby allowing the landscape to return to the traditional wildland fire burn cycle that existed before the development of the INEEL.

Under all three alternatives, we understand that INEEL facilities, property, and infrastructure would be aggressively protected, and the safety of humans (both workers and firefighters) would be of paramount importance.

It is very clear that when a wildfire is in progress, the incident commander must have the authority to decide which actions are necessary to protect people, facilities, and the vegetation that is likely to burn. The CAB would prefer that fire suppression activities be implemented in accordance with MITS, a manner that would minimize the impacts of on the land, whenever possible, without compromising the need to contain and suppress the fire. **The INEEL CAB recommends that, whenever possible, the Balanced Fire Protection Approach (Alternative 2) be utilized.**

We note that the BLM also favors the Balanced Fire Protection Approach, which is well described on page 16 of their document. **The INEEL CAB recommends that INEEL and the BLM continue to work together on pre-fire planning and fire suppression planning with the goal of using the same suppression approach and protection methods for the facilities.** We hope that this planning will allow full cooperation and seamless fire suppression regardless of the exact location of any wildfires that may occur in the vicinity of the INEEL.

In terms of fire prevention, it appears that the principal issues are management of fuel, including firebreaks, and strategies for managing unimproved roads. There is a tradeoff between aggressive, effective measures and the likely impacts on the ecosystem. Wide firebreaks will certainly impede a wildfire, but may have permanent negative impacts on the ecosystem. According to the Draft EA, improving roads would make firefighting efforts easier, but would also encourage additional use of the improved roads with consequent negative effects on the ecosystem. We noted that BLM favors improving some roads and recommends closing others. **The INEEL CAB recommends that fire prevention be pursued, but that the Balanced Fire Protection Approach (Alternative 2) be utilized.**

Finally, we note that Alternative 3 does not include a Wildland Fire Management Committee. Such a committee can help plan for the future, guide any wildfire restoration efforts, and provide a forum for lessons learned. **The INEEL CAB recommends that regardless of which alternative is selected, a Wildland Fire Management Committee be incorporated as part of how the decisions are implemented while seriously considering the special needs at the INEEL.**