

IOC TRANSMITTAL LETTER TO THE WRAP
TO ACCOMPANY THE FIRE EMISSIONS JOINT FORUM
"RECOMMENDED POLICY FOR CATEGORIZING FIRE EMISSIONS"
October 31, 2001

Dear WRAP Board:

At the recent September 5th meeting of the WRAP Initiatives Oversight Committee (IOC) in Seattle, Washington, the Fire Emissions Joint Forum (FEJF) made a presentation on the final "Recommended Policy for Categorizing Fire Emissions". The IOC wishes to thank Pete Lahm, Darla Potter, and Carl Gossard for making this presentation, and greatly appreciates all the effort and hard work of the Natural Background Task Team (NBTT) in developing this policy. The IOC endorses this consensus policy, and stresses the importance for states and tribes to adopt the entire Policy not just the Classification Criteria section of the Policy. However, there are several key provisions and recommendations in the policy that need further clarification, as discussed below.

The Recommended Policy for Categorizing Fire Emissions was developed to assist states and tribes in distinguishing between which fire emissions are anthropogenic and those that are natural. Under the Regional Haze Rule, all anthropogenic emissions need to be controlled to reduce visibility impacts in Class I areas, in order to meet the reasonable progress requirements of the Rule. Natural emissions are considered part of the "natural background conditions", and as such are not subject to the reasonable progress requirements.

The Policy is consistent with the Regional Haze Rule, and defines "natural" fire emissions as those that "...can result in a natural reduction of visibility..." and "anthropogenic" fire emissions as those that "contribute to visibility impairment ... [and] must be controlled to achieve progress toward the 2064 natural conditions goal..." The policy contains two main sections; Classification Program Management (Section 3.1) and Classification Criteria (Section 3.2). Concise overviews of these sections are included in the executive summary of the policy document (pp i & ii).

At the September 5th IOC meeting, there was much discussion of these elements of the Recommended Policy. The IOC endorses the policy, however the group identified certain areas where further clarification was needed from the FEJF in its future work. The IOC is aware that the FEJF is currently developing a series of policy and technical tools necessary to implement the Grand Canyon Visibility Transport Commission Recommendations and meet the requirements of the Regional Haze Rule. The FEJF needs to ensure that the following items are considered and clarified during the development of those policy and technical tools:

1. The distinction between the concepts of "managed" and "controlled" fire emissions, as it relates to fire classified as "natural" and "anthropogenic". The IOC believes future FEJF guidance needs to further clarify these terms, and describe how they apply in future FEJF recommended policies.
2. The distinction between "ecosystem maintenance" and "ecosystem restoration" burning and how they relate to "natural" and "anthropogenic" classifications.

3. The coordination with states and tribes on decisions by land managers to classify prescribed burning as either restoration or maintenance. The IOC is concerned about consistency in making this determination from state to state. FEJF guidance under development should include possible approaches states and tribes could follow to ensure close coordination and consistency in making this determination.

4. The establishment of an inter-forum workgroup as recommended in Appendix B of the Policy and consideration of additional ways for excluding wildfire impacts besides just traditional "flagging" of the monitoring data. Appendix B recommends a workgroup be formed to study how wildfire impacts in visibility monitoring data could affect the ability to demonstrate reasonable progress with the Regional Haze Rule. It further recommends that the workgroup consider the flagging of wildfire impacts in monitoring data in order to exclude it from reasonable progress assessments, similar to the approach in the PM10 Natural Events Policy for health standard violations from wildfire and natural dust events. The IOC believes it is imperative to establish an efficient procedure to account for natural emissions in setting initial baselines and assessing progress in reducing anthropogenic pollution. The IOC supports a process established by stakeholders that avoids case-by-case flagging of "episodes" similar to the Natural Events Policy. Instead, a regional protocol should be developed and integrated into the monitoring and reporting system that will reasonably quantify the natural impacts temporally and spatially. Such a system should be flexible enough to accommodate future technological advances in emissions and visibility measurements and assessments.

5. The effects of fire and air quality decisions on cultural resources. This concern needs to be addressed in future FEJF policy and technical tools, especially smoke management program development. In addition, the FEJF feasibility determination guidance cited in the policy should consider the addition of "cultural resources" as a feasibility factor for the use of alternatives to burning and implementation of smoke management programs.

6. The development of recommendations for smoke management programs and smoke effects at non-mandatory Class I areas, Class I areas not originally designated as mandatory Class I areas by Congress. There are only a few of these in the country, and most are on tribal lands.

7. The development of recommendations for the establishment of annual emission goals for fire (as required under Regional Haze Rule Section 309), including all prescribed fire. Section 309(6)(v) of the Regional Haze Rule requires annual emission goals for fire, excluding wildfire. Although annual emission goals under Section 309 extend to 2018, the IOC believes annual emission goals will be needed to 2064 to attain natural conditions.

8. The development of future policy and technical tools, to provide a clear stepwise progression for the Classification Program Management elements of the Policy. The progression for state or tribal programs from little or no regulatory control to emissions tracking to management of fires for the minimization of visibility impacts, and then implementation of Enhanced Smoke Management Programs should be explicitly addressed.