

## **FEJF Conference Call Notes**

**December 19, 2002 2:00 – 3:15 p.m. mountain**

**Purpose of Call:** Finalize the WRAP Policy on Fire Tracking Systems and achieve FEJF consensus approval for transmittal to the WRAP for final action.

**Members:** Pete Lahm, FEJF Co-Chair, USDA-FS; Ron Klein, FEJF Co-Chair, AK DEC; John Veranth, Environmental Representative, U of Utah; Dave Randall, Small Business Representative, Air Sciences; Jim Lawrence, State Representative, Council of Western State Foresters

**Non-Members:** Darla Potter, Fire Tracking System Task Team Chair, WDEQ-AQD; Rick Bodicker, SD DENR

### **Background Information: [Pete Lahm]**

- FEJF approval of Policy Statements at meeting in Tempe, AZ.
- WRAP Board was supportive of the consistent treatment of the Section 308 and Section 309 needs in Policy at the WRAP Board meeting in November. The WRAP Board was also supportive of the consistent development of the ESMP, AEG and FTS Policy.
- There appeared to be unilateral support for the Policy Statements at the WRAP Board meeting as well as in the review comments received on the document.
- The 12/9/02 version of the FTS Policy reflects the comments on the document that were received during the review period. The comment compilation is posted on the WRAP website in the FEJF Task Teams section.
- The FTS Policy was also discussed at the recent FEJF Meeting in Jackson Hole, WY.
- The WRAP FTS Policy draft dated 12/9/02 was the version sent out to the FEJF members for consideration and discussion on today's conference call.

### **Substantive Comments:**

Dave Randall – I have 4 or 5 issues that are big enough to talk about here but may or may not be substantive. Most of the issues come from the technical hard knocks of going through the FEJF 1996 and 2018 emissions inventory development.

No one else raised any other issues, substantive or non-substantive.

#### 1. Executive Summary, Page i, Line 28

[Dave Randall] The language “minimum spatial and temporal fire activity information necessary to consistently calculate emissions and uniformly assess fire impacts to regional haze, and to meet the requirements of the Rule.” appears several times throughout the document. I have a problem with the direct tie between the consistent calculation of emissions and uniform assessment of fire impacts. While it is true that the consistently calculated emissions can be plugged into the modeling analysis, the emissions inventory information does not directly translate into a uniform assessment of fire impact. This is because the emissions inventory can be handed to various modelers (WRAP or state to state) resulting in an assessment that is not uniform. See the text in several places throughout the document.

[Consensus Action] The language is to be modified as follows in the annotation “minimum spatial and temporal fire activity information necessary to consistently calculate emissions and to meet the requirements of the Rule. The resulting emissions will be used in modeling exercises to assess fire impacts to regional haze.” The modification will be made throughout the document annotation.

#### 2. Section 2.3, Page 3, Line 5

[Dave Randall] I don’t like the phrasing “estimated projected forward”, as fire is not the same as a point source and this is not the approach that has been taken with fire projections.

[No Action] This is a citation from the Regional Haze Rule and the language cannot be changed.

[Dave Randall] Section 3.5, Fire Emissions Projection, should highlight not using roll forward models for fire projections as the current method is to use data that is a best guess prediction of what fire will be in the future.

[Pete Lahm] In Section 3.5, it is not dictated how projections would be arrived at. Several methods are mentioned such as growth factors, survey, etc. This was done so that we are not tied to what was done in past but leaves it open for various options in the future.

[No Action] Agreement with the concept in Section 3.5, no necessary changes.

#### 3. Section 3.1, Page 5, Lines 8-28

[Dave Randall] I do not want to see us imply that the variability of fire activity information is the only element of uncertainty in the development of a fire emissions inventory.

[Consensus Action] That was not the intent of adding footnote 19 in this section. The language in footnote 19 will be changed as follows. “... and consequently was one of the sources of uncertainty in the resulting emission inventory.”

#### 4. Section 3.3, Page 8, Lines 26-30

[Dave Randall] In addition to the guidance documents cited, the FEJF experience in developing the 1996 and 2018 emission inventories was seminal to the selection of the seven essential components. The fact that the seven essential components are based on practical application will probably carry more weight with states and tribes that have to develop a fire tracking system than the guidance documents.

[Consensus Action] Add the following sentence with footnotes for the 1996 and 2018 emissions inventory reports at line 30. “The seven essential components have also been developed based on the experience gained through the FEJF’s 1996 and 2018 fire emissions inventory preparation efforts.”

#### 5. Section 3.3, Page 9, Lines 10-20

[Dave Randall] Are we comfortable not defining a de minimum level? Is it reasonable to add something that in the interim, prior to the assessment of potential de minimus levels by the FEJF, a state or tribe should default to zero so they are essentially tracking everything?

[Pete Lahm] The language throughout the Policy emphasizes “all fire sources” so I believe that it is implicit that the de minimus level is zero.

[Darla Potter] The interpretation via the comments received to date on the Policy is that the level is zero.

[Ron Klein] I agree, the state regulatory agencies appear to interpret that absent an established de minimus level the level is zero.

[No Action] This is not a drop-dead issue for Dave Randall, but it is not as explicit as he was expecting in the Policy. No change is necessary.

#### 6. Section 3.3.3, Page 9, Line 35

[Dave Randall] Is the use of the phrase “most significantly” an accurate statement? I want to make sure that we are accurate, especially if other measures are more important. I am comfortable emphasizing the importance but use words such as “critical” or “vital” as is done in the other essential components.

[Pete Lahm] I have knowledge of a thesis that evaluated the significance of various information in regards to the calculation of emissions and the area of burn is the most significant.

[Dave Randall] If that is the case then cite the thesis.

[Consensus Action] Darla and Pete will resolve by either adding the appropriate citation or modifying the language.

#### 7. Section 3.4, Page 10

[Dave Randall] I have a general comment on this section. I agree that it is important to talk about the notion of AEGs, but I’m not sure that the section strong enough (it is too nebulous) to convey the importance to the states.

[Dave Randall] More specifically, this section needs to drive home when it comes to future SIP/TIP planning that it is important to capture the difference in emissions between no management and the use of ERTs. The difference is more important than the actual emissions.

[Pete Lahm] This section is included to make states/tribes aware that they shouldn’t just look at the seven essential components as the be all end all. They need to look beyond the seven in regard to their specific situation and come away with what additional components should be added their FTS. We are trying not to dive too far down the path for the AEG because they need to read the AEG Policy not just the FTS Policy.

[Dave Randall] I think we should at least list the key parameter, i.e., the ones that enable you to calculate a difference.

[Pete Lahm] We need to be aware that the AEG Policy provides a number of options, not just the difference in emissions. So I hesitate to go this far and establish a higher hurdle than the other options, such as percent use of ERTs. The language on the options was further clarified in the final version of the AEG Policy. I think the nitty gritty on this should be in the guidance document.

[Consensus Action] At line 40, a sentence will be added referring to additional specifics to be provided in the guidance document to be developed for the fire tracking system. Additionally, the guidance document that is being developed on ERTs will also be mentioned.

#### 8. Section 3.3.7, Page 10

[Dave Randall] It is not clear that the “anthropogenic” or “natural” classification needs to be made based on the WRAP Policy for Categorizing Fire Emissions.

[Consensus Action] Add a sentence at the beginning of this section at line 18 that states “The “anthropogenic” or “natural” classification is to be determined per the WRAP *Policy for Categorizing Fire Emissions.*”

## 9. Appendix C, Page 20

[Dave Randall] Why aren't we taking this opportunity to be specific regarding things like using latitude and longitude for burn location and calendar day for date of burn?

[Pete Lahm] I question how far down the path we go in regard to specificity in Appendix C. Keep in mind our recent discussion while in Jackson Hole, regarding whether or not to use a legal description (Section, Township, Range) or latitude and longitude. I think it would be better to discuss this type of specificity in the guidance where additional justification can be introduced, especially where things such as fuel models are concerned. The development of additional guidance is reference several times in the FTS Policy.

[Dave Randall] I agree on leaving things like fuel models for the guidance, but I think we could add some examples (e.g., calendar day – e.g., lat./long. & legal description) without jeopardizing the future guidance document. I think we have a lost opportunity if don't address some specificity in Appendix C.

[Pete Lahm] Another factor affecting our decision to default to the higher level of discussion versus specificity in Appendix C is that we do not know what type of data is going to be in the WRAP emissions inventory system. So I hate to go down that road now and be wrong.

[Darla Potter] We received a lot of comments during the review period looking for specificity that we felt would be provided in the guidance. I hate to start down the path of providing specificity for some things but not others in Appendix C. I would like to see us wait for the guidance document.

[Jim Lawrence] A form needs to be provided in the guidance to ensure compatibility across the western states.

[No Action] Appendix C will stay as is. Specificity will be addressed in the guidance.

No other issues were raised for discussion.

### **Next Steps:**

- Pete and Darla will make the changes as brought up during the call in addition to changing some language from the TAR, as was done in the AEG Policy.
- Once the changes are made is there anything precluding us from taking this to the next step? Conference Call participants responded no and to move forward to the WRAP.
- The next step will be to go to the WRAP Board for approval of the FTS Policy via e-mail in month of January.
- The new version of the FTS Policy will be posted on the website and considered FEJF Consensus Approved.
- Thank You for calling in today.