




NBTT Briefing

FEJF Meeting
July 11, 2001




Categorization of Fire Sources

- ❖ Scientific inability to identify the source of monitored organic carbon aerosol
- ❖ Categorization of Fire is Necessary
 - ❖ Ambient Monitoring & Reporting Forum (AMRF) request to Fire Emissions Joint Forum (FEJF)
 - ❖ FEJF formation of the Natural Background Task Team (NBTT)




Regional Haze Rule Preamble

- ❖ “The EPA also recognizes that fire of all kinds (wildfire, prescribed fire, etc.) contributes to regional haze, and that there is a complex relationship between what is considered a natural source of fire versus a human-caused source of fire.”
- ❖ “Consequently, in determining natural background for a Class I area, EPA believes States [and Tribes] should be permitted to consider some amount of fire in the calculation to reflect the fact that some prescribed fire effects serve merely to offset what would be expected to occur naturally.”




Current FEJF / NBTT Process

- ❖ Develop a methodology to categorize fire into “anthropogenic” and “natural” source classifications.
- ❖ Develop approaches for estimating the contribution of fire emissions to natural background visibility conditions.
- ❖ Establish methods for tracking and apportioning fire emissions into the classifications above.



Focus of Work to Date

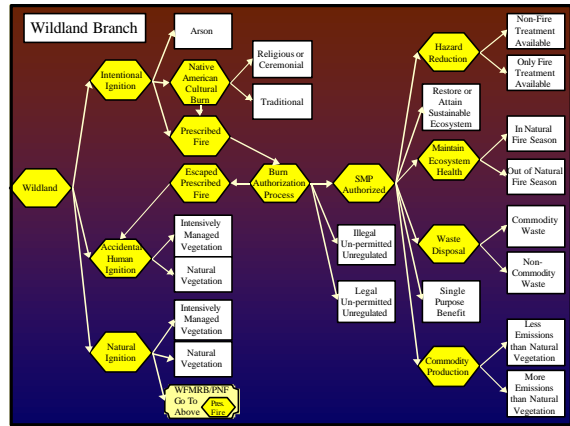
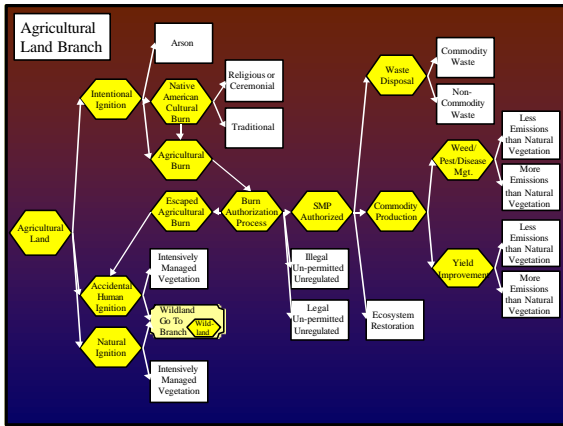
1. Develop a methodology to categorize fire into “anthropogenic” and “natural” source classifications.
 - ❖ Two-Workshop Format
 - ❖ Senior Staff Workshop
 - ❖ Technical & Policy Input
 - ❖ Policy Maker Workshop
 - ❖ Policy Input
 - ❖ WRAP Input (Acoma Pueblo Meeting)



Senior Staff Workshop

January 24-25, 2001 Denver, CO

- ❖ Workshop Objective
 - ❖ Categorize fire emissions sources into two classifications, “natural” and “anthropogenic”
 - ❖ Assess the technical and policy implications
- ❖ 1 ½ day workshop
 - ❖ ½ day - establish a common level of understanding
 - ❖ 1 day - small workgroup discussions



Senior Staff Workshop Results NBTT Review

- ❖ No Consensus between Workgroups
- ❖ Convergence of Workgroups
 - ❖ Similar Approaches
 - ❖ Similar Decision-Making Rationale
- ❖ Basis for NBTT's development of a comprehensive policy approach for categorizing fire emissions.

Draft Policy for Categorizing Fire Emissions

- ❖ Ten Policy Statements with supporting documentation (Background, Annotated Sections, Appendices, etc.)
- ❖ Represents the convergence of thought from the Senior Staff Workshop
 - ❖ Not representative of any one workgroup or workshop participant in particular
- ❖ Equitable and livable Draft Policy that can be implemented in the WRAP region

Policy Maker Workshop May 2, 2001 Tempe, AZ

- ❖ Workshop Objective
 - ❖ Build upon outcomes and information gained at the Senior Staff Workshop
 - ❖ Review Draft Policy for Categorizing Fire Emissions
- ❖ Facilitated and Moderated discussion
 - ❖ Input gathered from both Core Group and Concerned Stakeholder participants.

Policy Maker Workshop

- ❖ General assent on changes to some Draft Policy Statements.
- ❖ Some Draft Policy Statements supported as written.
- ❖ Some Draft Policy Statements not addressed due to time limitations.
- ❖ The vast majority of suggested changes were to the annotated sections of Draft Policy.

WRAP Meeting - NBTT Work Summary May 24, 2001 Pueblo of Acoma

- ❖ Work Summary
 - ❖ Progression of work accomplished to date
 - ❖ NBTT and FEJF decisions
- ❖ Discussion and Feedback
 - ❖ Initial post Policy Maker Workshop findings
 - ❖ Guiding Principles to the Draft Policy
- ❖ Feedback received was in support of the NBTT's direction and approach.

NBTT - Current Work

- ❖ Finalize a Draft Recommended Policy for Categorizing Fire Emissions
- ❖ Restructure Draft Policy into two associated sections
 - ❖ Classification Policy
 - ❖ Implementation Policy

"Natural" & "Anthropogenic" Classifications

- ❖ Natural Source Classification ("natural")
 - ❖ A categorization that designates which fire emissions can result in a natural reduction of visibility for each Federal Class I area in the WRAP region. This classification includes natural and human-caused ignitions.
- ❖ Anthropogenic Source Classification ("anthropogenic")
 - ❖ A categorization that designates which fire emissions contribute to visibility impairment for a Federal Class I area. "Anthropogenic" emissions must be controlled to achieve progress toward the 2064 natural visibility goal for each Federal Class I area in the WRAP region. This classification includes natural and human-caused ignitions.

Draft Recommended Policy - Does Not Apply To

- ❖ Other open burning activities
 - ❖ Regardless of the purpose of the burn
 - ❖ Residential property or Tribal lands
- ❖ Examples
 - ❖ backyard burning
 - ❖ garbage incineration
 - ❖ cremation
 - ❖ sweat lodge fires
 - ❖ residential wood combustion

Classification Policy

These Policy Statements apply to both wildland and agricultural lands regardless of ownership, cause of ignition, or purpose of the fire within the WRAP region.

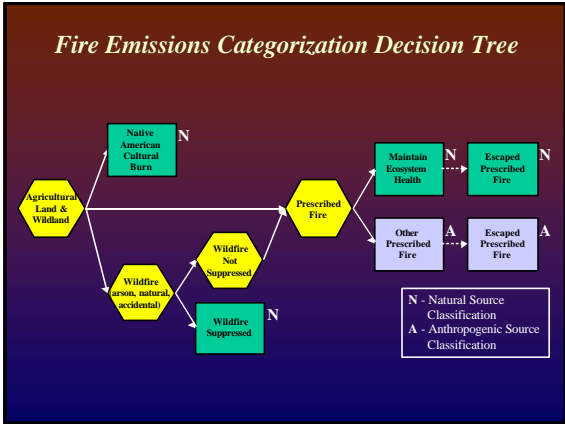
Classification Policy (cont.)

A. Prescribed Fire utilized to maintain an ecosystem that is currently in an ecologically functional and fire resilient condition is a "natural" source. Prescribed fire for all other purposes is an "anthropogenic" source. Escaped prescribed fire is classified according to its pre-escape classification.

Classification Policy (cont.)

B. Wildfire that is suppressed by management action is a “natural” source. Wildfire, when suppression is limited for safety, economic, or resource limitations, remains a “natural” source. Wildfires managed for resource objectives are classified the same as prescribed fires.

C. Native American cultural burning for traditional, religious, and ceremonial purposes is a “natural” source.



Implementation Policy

A. All fires must be managed to minimize visibility impacts.

B. All emissions from fires classified as an “anthropogenic” source will be controlled to the maximum extent feasible subject to economic, safety, technical and environmental considerations.

C. Emissions from all fire will be tracked.

Draft Recommended Policy - Structure

- ❖ Purpose
- ❖ Scope and Applicability
- ❖ Background
- ❖ Classification Policy
- ❖ Classification Policy Annotation
 - ❖ Prescribed Fire
 - ❖ Wildfire
 - ❖ Native American Cultural Burning
- ❖ Implementation Policy

Draft Recommended Policy – Structure (cont.)

- ❖ Implementation Policy Annotation
 - ❖ Management to Minimize Visibility Impacts
 - ❖ Control Emissions from “Anthropogenic” Sources
 - ❖ Tracking Fire Emissions
- ❖ Appendices
 - ❖ Monitoring Guidance (Greater than 1 deciview impacts from Wildfire events)
 - ❖ Definitions
 - ❖ *Others to be determined*

Draft Recommended Policy

- ❖ Maintain the following Guiding Principles
 - ❖ Equity among all large sources of fire emissions.
 - ❖ Application of emissions controls on sources that could feasibly be controlled to demonstrate reasonable progress.
 - ❖ Use of Regional Haze Rule and/or Grand Canyon Visibility Transport Commission (GCVTC) language to ensure consistency and allow Draft Policy linkage to SIPs/TIPs.
 - ❖ Consistent Smoke Management Programs for both Sections 309 and 308 of the Regional Haze Rule.

Draft Recommended Policy - Changes

- ❖ Add “feasibility” language to Draft Policy Statement #2 with an associated commitment from the FEJF to develop guidance for the “feasibility” implementation.
- ❖ Recognize traditional Native American burning in association with religious and ceremonial burning in Draft Policy Statement #9.
- ❖ Removal of Draft Policy Statement #10 (re: Native American Prescribed Burning).

Draft Recommended Policy - Changes

- ❖ Several changes and additions to the Annotation Sections
 - ❖ Include linkage to the National Fire Plan (elements & definitions) explicitly not implicitly.
 - ❖ Recognize severe wildland fuel conditions in the West.
 - ❖ Recognize that the use of prescribed fire will increase in federal, state, and private sectors through the National Fire Plan. The funds are in place through the National Fire Plan.

Annotation Changes (cont.)

- ❖ Discuss that assessment and classification will occur at the local level rather than at a programmatic level.
- ❖ Discuss alternatives to burning.
- ❖ Discuss emissions averted/reduced and tracking emissions.
- ❖ Discuss Matrix of Implementation (Management) Policy items.
- ❖ Remove the Magnitude, Linkage, and Senior Staff Workshop Results sections from the Annotation Sections.

Continued Work

- ❖ Present Draft Recommended Policy to AAQTF (Ag.)
- ❖ FEJF - Review and Approve the Recommended Policy submitted by the NBTT
- ❖ WRAP - Review and Approve the Recommended Policy submitted by the FEJF
- ❖ Ambient Monitoring & Reporting Forum - Utilize the WRAP approved Policy to apportion fire emissions
- ❖ States and Tribes in the WRAP Region - Incorporate the WRAP approved Policy into the technical support documentation for a SIP/TIP



NBTT Briefing at FEJF Meeting

Tuesday, July 11, 2001

8:30 –11:45 a.m.

Rapid City, South Dakota

In attendance: Pete Lahm, Mark Fitch, Bob Palzer, Steve Gerritson, Mike Ziolk, Diane Riley, Phil Harwell, Pat Shaver, Scott Kuehn, Dave Randall, Carl Gossard, Tom Pace, Frances Bernards, Gregory Josten, Brian Gustafson, Suraj Ahuja, Charlene Schildwachter, Dave Jones, Pete Stewart, Vicky Komie, Jim Russell, Darla Potter, Larry Biland, Rick Sprott, Rich Fisher, Rebecca Reynolds

FEJF Comments & Questions

Prescribed Fire (Classification Policy A)

--Ecosystem Maintenance Burning definition: Concerned that if this definition is based on the Cohesive Strategies' condition class numbers it will result in unrealistic emissions based on the number of acres projected at the macro scale. (S. Kuehn)

NBTT Response: Although the Policy will be tied to the National Fire Plan (which includes the Cohesive Strategies), the decision as to what is an ecosystem maintenance burn will be made at the local level, and not based on the national acreage projections.

The local decision will be made through land use planning and fire management planning.

--Who will determine the classification of the burn on non-federal land? (P. Shaver)

NBTT Response: The person(s) responsible for the burn.

--There are many reasons to burn, as long as ecosystem maintenance is one of them, will the burn be considered "natural"?

NBTT Response: No, the primary reason for the burn will be the determining factor. The NBTT will more strictly determine/narrowly define this in the Annotation.

--Consistency will be imperative – where is "maintenance burning" defined? (D. Riley)

NBTT Response: It will be defined in the Annotation although specific criteria may not be utilized in the definition.

--What does "fire resilient," mean exactly? (V. Komie)

NBTT Response: It will be defined in the Annotation.

--Need a specific link to an air quality manager in the decision process in regard to the classification made at the local level (i.e., collaborative decision). The classification cannot just be up to the fire instigator. The determination needs to be made between the instigator and the regulator. The classification needs to be made in a trackable, enforceable, and culpable way. (D. Randall)

Native American Burning (Classification Policy C)

--The changes to Policy Statement #9 and the deletion of #10 are agreeable. Does want to emphasize that there are 149 Tribes in the Western region and not all have reviewed this document. Therefore it is important to recognize that this Policy does not speak for them all. (K. McKernan)

--I still have difficulty with Tribal burning being “natural”, and I want that expressed even though I am aware that I am in the minority. (S. Kuehn)

--Will there be a definition of “religious, ceremonial and traditional” in the Annotation? (D. Riley)

NBTT Response: A tribe or tribal council will determine what is religious, ceremonial or traditional, which will most likely vary from tribe to tribe. However, if Native American burning meets the definition of Prescribed Fire, then it will follow that classification in the Policy.

--It would be nice to have some clarification on what “traditional” is. (D. Riley)

NBTT Request: K. McKernan will pull together some specific examples from each (religious, ceremonial, traditional) type of burning by next week for NBTT to use. [Some examples may be subsistence plant material burning such as basket weaving materials, grasses, huckleberries, and tule.]

Prescribed Fire – Escaped (Classification Policy A)

--Concern that escaped prescribed fires will retain their original classification – if what is originally considered a maintenance burn escapes, then a lot more emissions will result that will not be counted. (B. Palzer)

NBTT Response: The opposite will also be true. We have had a lot of consideration over this one: the decision to do it this way made the most sense. Less than 1% of prescribed fires actually escape, and tracking it this way is much more practical.

--Remember that this is only a classification for visibility purposes. (D. Jones)

--What acreage results from an escaped fire as compared to the acreage originally intended in the prescribed fire? (B. Palzer)

NBTT Response: We do not know that information and are not sure if this data is being tracked. It would be helpful if it is available.

--This gets back to the point that definitions are the key between maintenance and restoration burning: not all prescribed fire is “natural”. (S. Kuehn)

NBTT Response: Correct.

--Will the two classifications of escaped prescribed fire offset each other in the long run? (S. Kuehn)

NBTT Response: We do not know.

--If there is to be a break in the classification of escaped prescribed fire from the original prescribed fire, I suggest using suppression as a further criterion to re-classify, but I can live with it the way it is. (S. Kuehn)

--What % of prescribed fire would be “anthropogenic” currently or over the last 5 years? (T. Pace)

Response (T. Sexton): About 90% in the WRAP region.

NBTT Response: 80% of the maintenance burning is mostly in the southeast. The focus for the National Fire Plan is urban/interface burning (i.e., hazardous fuel reduction) over the next 10 years and will be classified as “anthropogenic”.

--Confusing: are we looking at fuel loading in the natural range of variability as “natural” or ecosystem maintenance as “natural”? These are two different things, and I am not sure which one is the focus of the classification. (G. Josten)

NBTT Response: “Natural range of variability” was not a useful criterion because no one could determine (agree on) the definition. We also considered a historical view but it was discounted, as we couldn’t agree on how far back to go. So we decided on “fire resilient” as it represents consensus (i.e., people can live with it). We also kept in mind the tracking implications to this – chose this for efficiency’s sake.

--Concerned that we’ll get people lying to get their fire “natural” or there will be so many loopholes that this will be for naught. Also concerned that huge fuel load all being counted “anthropogenic” (restoration) will hide the fuel that would be there naturally, skewing the number of emissions that must be reduced. We should be giving credit back to compensate for the “natural” fuel levels that would be there anyway. (V. Komie)

NBTT Response: Burning in the maintenance state will actually produce lower emissions due to the burn being conducted at a lower intensity. Keep in mind that the NBTT is only establishing the Policy for the classification, not the determination of the Natural Background Value in 2064.

--If you are doing restoration burning, you aren’t burning the natural fuel component (i.e., taking it back to ground zero). The “anthropogenic” restoration burn will take care of the accrued fuel buildup but not the natural fuel. (T. Sexton)

--Standard deviation in fire is high to begin with. (P. Stewart)

NBTT Response: Fire is a highly variable source that will be recognized in the Background of the Policy.

--I acknowledge that NBTT is only doing classification at this point, but by classifying, we are defining the way to get to numbers. I am concerned about Ag. Burning: there seem to be many ways to define maintenance so that most of Ag burning could be considered “natural” – especially in eastern Washington. (S. Gerritson)

NBTT Response: We see very few instances where this would be the case. We can clarify our intention in the Annotation. Also, give examples that communicate “commodity production” to clarify the intent of classification as “anthropogenic”.

--Concern about interpretation at local levels – how to get consistency? (S. Gerritson)

Response (T. Sexton): Although the fire instigator will initiate the classification, state air regulators will provide checks and balances.

Implementation Policy

--If NBTT is just classifying, why is it necessary to have the Implementation Policy? Couldn’t that be left to other Task Teams, i.e., isn’t it premature? (D. Riley)

NBTT Response: Because of the many opposing interests involved, and the concern that some would get a “free lunch”, NBTT felt it was important to level the playing field by developing the Implementation Policy statements. These arose out of the Senior Staff Workshop and the concerns about what the classification would actually mean.

--Suggest that NBTT acknowledge these concerns in the background to the Classification Policy and refer to the other Task Teams' work instead of the Implementation Policy. (D. Riley)

NBTT Response: The Implementation Policy is stating what needs to happen in order for the Classification Policy to work effectively and equitably. NBTT can refer to other Task Teams work/role in this.

--Concern over assigning "natural" and "anthropogenic" to a BSMP and ESMP when this work has yet to be done to establish the elements of a BSMP or ESMP. (D. Riley)

NBTT Response: That part of the Annotation has been revised. Also, WRAP supports consistency of smoke management programs between 308 and 309 states.

--I feel this could be a goal, but should not be a Policy. (D. Riley)

Implementation Policy A

--This needs more clarification – it sounds like it is *the* priority rather than *a* priority among many, including fire fighter safety. (T. Sexton)

NBTT Response: This is made clear in the Annotation.

--How are wildfires managed for visibility impacts? (F. Bernards)

Response (P. Stewart): Where you put a control line in or place retardant will have an impact on emissions, even for a wildfire.

--Where is "minimize visibility impacts" in the RHR or GCVTC Recommendations? (D. Riley)

NBTT Response: In the Annotation we will tie back to the original documents as much as possible.

Implementation Policy B

--For "anthropogenic" sources, alternative uses need to be emphasized. (V. Komie)

NBTT Response: This will be included in the Annotation. Also, clarifying the difference between control and manage was the reason behind referring to BSMP and ESMP.

--Need to include a definitions page at the beginning, and then repeat the definition for control in a footnote where it is used. (L. Biland)

--All emissions from all fires will be under a SMP – I'd like this added back into the Implementation Policy. (S. Kuehn)

--Where is "control to the maximum extent feasible" in the RHR or GCVTC Recommendations? (D. Riley)

NBTT Response: "control" is from the RHR. In the Annotation we will tie back to the original documents as much as possible.

Response (D. Randall): "maximum extent feasible" comes from the GCVTC Recommendation #7. The NBTT is going a little beyond the GCVTC Recommendation but is consistent with the intent of the Recommendation language.

Implementation Policy C

--Will the tracking be handled (and how – e.g., proximity, de minimus, etc.) by another Task Team? (B. Gustafson)

NBTT Response: Yes, and we can specifically refer to this in the Annotation.

--Where is the “tracking of all fires” in the RHR or GCVTC Recommendations? (D. Riley)

NBTT Response: In the Annotation we will tie back to the original documents as much as possible.

Response (D. Randall): GCVTC Recommendation #2.

Implementation Policy

--The Implementation Policy is not policy. It is rather “considerations” for the Classification Policy. Change the “will” language to “should”. (T. Pace)

--NBTT could refer to this section as References to the GCVTC Recommendations, e.g., Policy B = GCVTC Recommendation #7. (D. Randall)

--Describe in Annotation that the actual methodologies and mechanics of A, B and C will be worked out and specified by other Task Teams. (D. Riley)

NBTT Response: OK. The Implementation Policy also emphasizes the equity issue.

--Instead of “Policy”, suggest “Guiding Principles.” (R. Fisher)

--Implementation Policy A is more strict than the GCVTC recommendations, and Implementation Policy B is more lenient. Perhaps NBTT could paraphrase what’s in the RHR or GCVTC rather than come up with new guiding principles. (D. Riley)

Response (D. Jones): I disagree that A is stricter.

--More RHR language can be included in Annotation – keep statements simple. (D. Jones)

--Why not keep B simple too? Take out the caveat “subject to...” – or add it to A as well. (D. Riley)

--Keep in mind, the FEJF would have to develop additional guidance for this if the feasibility statement was added to A. (P. Lahm)

--Add the feasibility statement in the Annotation for A and keep the Policy Statement simple. (D. Jones)

NBTT Response: OK

--The NBTT will go back and review all comments and make sure that our language is consistent to that of both the RHR and the GCVTC, and refer to other Task Teams’ work/role. The Policy Statements will remain an “Implementation Policy” pending the above consideration.