

**TASK LIST FROM THE NATURAL BACKGROUND TASK TEAM TO THE FIRE EMISSIONS JOINT FORUM  
JANUARY 15, 2002**

The *Policy for Categorizing Fire Emissions* has been approved by the Western Regional Air Partnership (WRAP) and the Natural Background Task Team (NBTT) has completed the *Supporting Documentation for the Recommended Policy for Categorizing Fire Emissions*. With the approval of the *Policy for Categorizing Fire Emissions*, the NBTT has completed the development of a methodology to categorize fire into “anthropogenic” and “natural” source classifications.

During the development of a methodology to categorize fire emissions, the NBTT noted several tasks that need to be addressed by the Fire Emissions Joint Forum (FEJF). As the NBTT was decommissioned at the September 27-28, 2001 FEJF meeting, the NBTT compiled this Task List for the FEJF’s consideration when evaluating future work and work currently underway. The tasks to be addressed by the FEJF were previously identified in the following sources: *Policy for Categorizing Fire Emissions*, IOC Transmittal Letter to WRAP, *Supporting Documentation for the Recommended Policy for Categorizing Fire Emissions*, and *Interim Report Policy Maker/Opinion Leader Workshop – Fire’s Contribution to Natural Visibility*. The tasks identified in the following table have not been evaluated or identified for relative priority.

The Task List consists of an alphabetic task identifier, brief task description, task specifics (e.g., language contained in the *Policy for Categorizing Fire Emissions*) and source of the language, and a recommended group to address the task. A quick reference listing is provided below to assist the recommended groups in identifying all tasks to be addressed under their purview.

<b><u>RECOMMENDED GROUP</u></b>	<b><u>TASK(S) TO BE ADDRESSED</u></b>
Fire Emissions Joint Forum (FEJF) & Ambient Air Monitoring & Reporting Forum (AMRF)	N
Fire Emissions Joint Forum (FEJF)	I
Agricultural Alternatives Task Team	B, F, O
Basic Smoke Management Program (BSMP) Task Team	A, B, C
Emissions Task Team	D, H, J, K, L, M, O
Enhanced Smoke Management Program (ESMP) Task Team	A, B, C, D, E, G, J, K
Prescribed Fire Program Assessment Task Team	J
Wildland Alternatives Task Team	B, F, O

<b>TASK ID</b>	<b>TASK DESCRIPTION</b>	<b>TASK SPECIFICS (SOURCE)</b>	<b>TO BE ADDRESSED BY (recommendation only)</b>
A	<p>Elements of a BSMP and Elements of an ESMP</p> <p><i>(also see Task B)</i></p>	<p>This Policy may strengthen processes and current systems in place that address these [<i>public health and nuisance smoke intrusions</i>] smoke concerns; however, this specific interaction is being addressed through further recommendations by the FEJF. (<i>Policy for Categorizing Fire Emissions</i>, Section 1.4, Page 6, Last Sentence)</p> <p>The FEJF is developing recommendations for the WRAP for the ESMP ... (<i>Policy for Categorizing Fire Emissions</i>, Section 3.1.2, Page 11, 3<sup>rd</sup> Paragraph, Last Sentence)</p>	<ul style="list-style-type: none"> <li>• BSMP Task Team</li> <li>• ESMP Task Team</li> </ul>

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B	Effects of fire and air quality decisions on cultural resources <sup>1</sup> .  <i>(applicable, at a minimum, to Tasks A, E &amp; F)</i>	[ <i>Consider and clarify</i> ] 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. ( <i>Policy for Categorizing Fire Emissions</i> , Appendix C, IOC Transmittal Letter to WRAP, Bullet 5)	<ul style="list-style-type: none"> <li>• Agricultural Alternatives Task Team</li> <li>• BSMP Task Team</li> <li>• ESMP Task Team</li> <li>• Wildland Alternatives Task Team</li> </ul>

<sup>1</sup> Different tribes will likely define "cultural resources" differently. Therefore the definition and examples that follow are very broad and will need to be refined by the FEJF when addressing a specific issue.

#### Cultural Resources

When & Where - Within lands traditionally, currently, and formerly occupied and/or used by a Native American tribe or individual (e.g., within or near ancestral territories and tribal boundaries). Some traditionally and culturally significant places may be used only at certain times of the year, which may be significant depending on access, wind patterns, and sun (time) markings noted on mountain peaks.

Why - Things that are of particular and special significance regarded or used within cultural systems and cultures for purposes of ceremony, subsistence, religion, medicine, and daily activities.

What - Historic structures; archaeological sites, including artifacts and associated features; language and religion; and traditional cultural objects. Traditional cultural properties (e.g., Native American holy places, ceremonial sites, other traditionally important places or events) and the associated fish, wildlife, and vegetation; water, land, and air sustaining the people and environment; visibility; and health of the system (i.e., ecosystem, including human health).

Examples include, but are not limited to:

High points on mountains known by practitioners, and in common, to be significant to tradition and cultural beliefs. Specially man marked or enhanced areas, such as petroglyphs. Areas associated with tribal creation or related beliefs as areas deemed appropriate for use by the Creator, GOD, and Spirit Leaders. Special areas designed by medicine people for medicinal plant materials gathered at particular and significant locations. Particular places marked for hunting and subsistence activities for fish, deer, berries, obsidian, pine needles, and basketry goods. The ability to clearly see a significant vista, landmark or spiritual place that is essential to a prayer or ceremony.

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C	BSMP/ESMP consideration of smoke effects at non-mandatory Class I areas.	<p>[<i>Consider and clarify</i>] 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. (<i>Policy for Categorizing Fire Emissions</i>, Appendix C, IOC Transmittal Letter to WRAP, Bullet 6)</p> <p>Note: The five tribally re-designated (i.e., non-mandatory) Class I areas in the WRAP region are: Fort Peck Reservation in Montana, Northern Cheyenne Reservation in Montana, Flathead Reservation in Montana, Yavapai-Apache Reservation in Arizona (Class I status under litigation), and The Spokane Reservation in Washington.</p>	<ul style="list-style-type: none"> <li>• BSMP Task Team</li> <li>• ESMP Task Team</li> </ul>
D	Clear stepwise progression for Classification Program Management elements of the Policy.	<p>In recognition of this [<i>vast differences in SMPs, use of emission reduction practices, approaches to visibility effects of fire, state legislative requirements or those of tribal government</i>] the FEJF is working to insure that the policy and program management recommendations that the Forum develops are implemented through the WRAP in a progressive manner. (<i>Policy for Categorizing Fire Emissions</i>, Section 3.1, Page 9, Last Paragraph, 1<sup>st</sup> Sentence)</p> <p>[<i>Consider and clarify</i>] 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, with consideration for indirect emissions estimation techniques, to management of fires for the minimization of visibility impacts, and then implementation of Enhanced Smoke Management Programs should be explicitly addressed. (<i>Policy for Categorizing Fire Emissions</i>, Appendix C, IOC Transmittal Letter to WRAP, Bullet 8)</p>	<ul style="list-style-type: none"> <li>• Emissions Task Team</li> <li>• ESMP Task Team</li> </ul>

TASK ID	TASK DESCRIPTION	TASK SPECIFICS (SOURCE)	TO BE ADDRESSED BY (recommendation only)
E	<p>Recommendations for managing and controlling fire emissions sources &amp; Guidance for feasibility determinations.</p> <p><i>(also see Task B)</i></p>	<p>The FEJF is developing recommendations for managing fire emissions sources with the goal of minimizing visibility impacts. (<i>Policy for Categorizing Fire Emissions</i>, Section 3.1.1, Page 10, Last Paragraph, Last Sentence)</p> <p>[<i>Consider and clarify</i>] 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. (<i>Policy for Categorizing Fire Emissions</i>, Appendix C, IOC Transmittal Letter to WRAP, Bullet 1)</p> <p>The FEJF is developing guidance for feasibility (i.e., economic, safety, technical and environmental considerations) determinations. (<i>Policy for Categorizing Fire Emissions</i>, Section 3.1.2, Page 11, 2<sup>nd</sup> Paragraph, Last Sentence)</p> <p>Note: This is directly related to the feasibility to control to the maximum extent feasible. (See <i>Policy for Categorizing Fire Emissions</i> – Page 11, 2<sup>nd</sup> Paragraph)</p>	<ul style="list-style-type: none"> <li>• ESMP Task Team</li> </ul>
F	<p>Availability and feasibility of alternatives to burning.</p> <p><i>(also see Task B)</i></p>	<p>The FEJF is assessing the availability and feasibility of alternatives to burning for both wildlands and agricultural lands. (<i>Policy for Categorizing Fire Emissions</i>, Section 3.1.2, Page 11, Last Paragraph, Last Sentence)</p>	<ul style="list-style-type: none"> <li>• Agricultural Alternatives Task Team</li> <li>• Wildland Alternatives Task Team</li> </ul>

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G	Recommendations for creation of an annual emissions goal.	<p>The FEJF is developing recommendations for the WRAP for ... how an annual emissions goal may be created. (<i>Policy for Categorizing Fire Emissions</i>, Section 3.1.2, Page 11, 3<sup>rd</sup> Paragraph, Last Sentence)</p> <p>[<i>Consider and clarify</i>] 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. (<i>Policy for Categorizing Fire Emissions</i>, Appendix C, IOC Transmittal Letter to WRAP, Bullet 7)</p> <p>Annual emissions goals established cooperatively. (<i>Interim Report Policy Maker/Opinion Leader Workshop – Fire’s Contribution to Natural Visibility</i>, Page 4, Opening Comments &amp; Questions)</p>	<ul style="list-style-type: none"> <li>• ESMP Task Team</li> </ul>

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H	Recommendations for tracking fire emissions.	<p>The FEJF will be developing recommendations on the parameters that will need to be tracked and for what source size. <i>(Policy for Categorizing Fire Emissions, Section 3.1.3, Page 12, Last Paragraph, Last Sentence)</i></p> <p>Establish methods for tracking and apportioning fire emissions into the classifications above [<i>“anthropogenic” and “natural”</i>]. <i>(Supporting Documentation for the Recommended Policy for Categorizing Fire Emissions, Recommended Policy Development Process, Background, Page 3, Bullet 3)</i></p> <p>Consideration needs to be given to the awarding of credits for emission reduction practices. <i>(Interim Report Policy Maker/Opinion Leader Workshop – Fire’s Contribution to Natural Visibility, Page 10, Policy Makers Discussion [Policy Statements #4 &amp; #5])</i></p> <p>Providing incentives to move systems toward maintenance may take the form of credits for the balance between wildfire and prescribed fire. <i>(Interim Report Policy Maker/Opinion Leader Workshop – Fire’s Contribution to Natural Visibility, Page 11, Policy Makers Discussion [Policy Statements #4 &amp; #5])</i></p> <p>Suggested Modification: In Annotation, recognize the suggestions for the tracking system (e.g., credits, use of alternatives, emissions avoided) to be considered and evaluated by the FEJF or one of its task teams as the tracking system is developed. <i>(agreed)</i> <i>(Interim Report Policy Maker/Opinion Leader Workshop – Fire’s Contribution to Natural Visibility, Page 16, Policy Makers Discussion Draft Policy Statements #3)</i></p>	<ul style="list-style-type: none"> <li>Emissions Task Team</li> </ul>

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I	Recommendation for the formation of an inter-forum workgroup.	<p>Based on the variability and the magnitude of wildfire emissions, the FEJF recommends that in conjunction with the AMRF and with involvement of EPA, a workgroup be formed to study the effects from unwanted wildfire events on the establishment of baseline, current, and natural background visibility conditions, as well as on the demonstration of reasonable progress. The development of an approach similar to the <i>Natural Events Policy</i> for wildfires under suppression should be considered by the aforementioned workgroup, to ensure that visibility improvements from other source types are not masked by visibility impacts from unwanted wildfire events.</p> <p>(<i>Policy for Categorizing Fire Emissions</i>, Appendix B, Page 26, Only Paragraph)</p> <p>[<i>Consider and clarify</i>] 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. (<i>Policy for Categorizing Fire Emissions</i>, Appendix C, IOC Transmittal Letter to WRAP, Bullet 4)</p>	<ul style="list-style-type: none"> <li>• FEJF (Letter from FEJF to IOC/TOC recommending formation of an inter-forum workgroup.)</li> </ul>

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J	Coordination and consistency for classification decisions.	<p>[<i>Consider and clarify</i>] 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. (<i>Policy for Categorizing Fire Emissions</i>, Appendix C, IOC Transmittal Letter to WRAP, Bullet 3)</p> <p>Note: This is directly related to the local classification determination with oversight by the applicable air quality regulatory authority. (See <i>Policy for Categorizing Fire Emissions</i> – pg. 12, last paragraph; pg. 14, 3<sup>rd</sup> paragraph; pg. 18, last paragraph, 1<sup>st</sup> sentence)</p>	<ul style="list-style-type: none"> <li>• Emissions Task Team</li> <li>• ESMP Task Team</li> <li>• Prescribed Fire Program Assessment Task Team</li> </ul>
K	Clarify “ecosystem maintenance” and “ecosystem restoration” and relation to “natural” and “anthropogenic” classifications.	[ <i>Consider and clarify</i> ] The distinction between “ecosystem maintenance” and “ecosystem restoration” burning and how they relate to “natural” and “anthropogenic” classifications. ( <i>Policy for Categorizing Fire Emissions</i> , Appendix C, IOC Transmittal Letter to WRAP, Bullet 2)	<ul style="list-style-type: none"> <li>• Emissions Task Team</li> <li>• ESMP Task Team</li> </ul>
L	Estimation approach for fire’s contribution to natural background visibility conditions.	Develop approaches for estimating the contribution of fire emissions to natural background visibility conditions. ( <i>Supporting Documentation for the Recommended Policy for Categorizing Fire Emissions</i> , Recommended Policy Development Process, Background, Page 2, Bullet 2)	<ul style="list-style-type: none"> <li>• Emissions Task Team</li> </ul>
M	Fire emissions inventory supplemented by “natural” and “anthropogenic” classifications.	If possible, apply the <i>Policy for Categorizing Fire Emissions</i> Classification Criteria to the 1996 fire emissions inventory to assign “natural” and “anthropogenic” classifications. Note: Given the state of the 1996 fire emissions inventory it is recognized that this would produce a very rough estimation of “natural” and “anthropogenic” emissions for 1996. (Expectation of the FEJF from the AMRF)	<ul style="list-style-type: none"> <li>• Emissions Task Team</li> </ul>

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N	Consider impacts versus emissions generated from fire.	Need to have some measure of impacts versus emissions generated. Oregon has an element of its smoke management plan to account for burning under meteorological impairment. Additionally, burning of piles during optimum mixing may limit impacts to visibility as well as NAAQS. Thus, restoration burning may not have any impact on visibility – why shall emissions count? <i>(Interim Report Policy Maker/Opinion Leader Workshop – Fire’s Contribution to Natural Visibility, Page 15, Concerned Stakeholder Comment (index card))</i>	<ul style="list-style-type: none"> <li>• FEJF &amp; AMRF (inter-forum issue)</li> </ul>
O	Cost-benefit analyses – applicable to a variety of FEJF tasks.	A cost-benefit analysis would be helpful in this process, e.g., the obvious benefits to suppression such as protection of property versus the costs of the new tracking and monitoring equipment/personnel that will be needed to deal with what is currently unmonitored fire. <i>(Interim Report Policy Maker/Opinion Leader Workshop – Fire’s Contribution to Natural Visibility, Page 5, Opening Comments &amp; Questions)</i>	<ul style="list-style-type: none"> <li>• Agricultural Alternatives Task Team</li> <li>• Emissions Task Team</li> <li>• Wildland Alternatives Task Team</li> </ul>