

WRAP Board Meeting, November 13, 2002

Notes from Fire Emissions Joint Forum portion of meeting. Prepared by Darla J. Potter.

ESMP Policy – No questions.

AEG Policy Questions

Bob Saunders (WA) – For the numeric number, is that in terms of emissions, acres, or tons of fuel?

Pete – The AEG Policy lays out two possible options: tons averted and percent ERT use.

Andy Ginsburg (OR) – With respect to the Fire Categorization Policy, does the AEG Policy apply to maintenance burning?

Pete – Yes.

Andy G – Are there different types of ERTs for maintenance vs restoration burns?

Pete – Yes. For example, high fuel moisture could be used for both types of burns but the removal of material is more viable in a restoration situation.

Andy G – Will the future guidance bring those differences out?

Pete – The work for Appendix D will not be a situational analysis. The collaborative process is where you would get into the applicability of the ERTs.

Bill Grantham (NTEC) – I believe there is an error in the Appendix C, Section 1 table on page 15. In the row listing “natural” sources for the Native American burning.

Pete – We’ll review the table to make sure it is correct.

Darla Note – Also make sure that the words natural and anthropogenic appear in quotes in this table.

Stanley (Pueblo of Acoma) – In Appendix C, Section 3 on pages 16-17, why are the examples exclusionary (e.g., NM is not included)?

Pete – They are meant to be examples only.

Chris Shaver (NPS) – Since this is just a goal, are there incentives or rewards for achievement or surpassing the goal once the goal has been established?

Pete – The primary incentive is that the goal is a regulatory requirement.

Chris – If the goal is surpassed, is there a way to bank and trade the ERT use that surpassed the goal?

Pete – The FEJF did not assess the banking/trading aspect. Currently there is no viable system to ensure the appropriate checks and balances.

Chris – I would suggest the inclusion of at least public recognition as an incentive for achievement of the goal.

Chris – Alternatives to burning are not part of the goal. What if the fuel is removed and then burned somewhere else (i.e., biomass utilization)?

Pete – The FEJF did not follow the fuel through to the end-use. Additionally, there is a fine line between ERTs and non-burning alternatives. The main difference being whether in the end the parcel of land undergoes a burn.

Andy – Complimentary statements to the group that developed the AEG Policy.

Andy – Endorse the proposal for the white paper on non-burning alternatives. The following are items OR would like to see addressed in the white paper.

The use of non-burning alternatives is determined in the forest plans and typically the air quality and fire folks don't work together on those 10-year plans. OR would like you to address in the white paper how to engage in the 10-year planning, possibly even something that goes beyond NEPA and ties in to the regional haze process.

The two documents prepared for the FEJF on the non-burning alternatives on agricultural land and wildland should be cross-referenced in all of the WRAP fire policies whenever possible and especially in the white paper. (Appendix C, Section 4.2, page 18)

Appendix C, Section 4.2; the end of this section turns to tracking. The decision to track is left up to the discretion of states and tribes, is this out of place in this policy? Non of the policies tie together how non-burning alternatives are tracked. This needs to be addressed in the white paper as the need to track non-burning alternatives needs to occur on some level, even if it isn't the project level.

Note: Brian Finneran (OR) is willing to be involved in the white paper development via a conference call.

Stanley – Will the tribes be required to keep track of what fuel is taken from thinning an area and then used in fireplaces?

Pete- Not through the fire policies.

Lee Gribovicz (Co-Chair Emissions Forum) – Fireplace emissions are a separate area source category in the emissions inventory and emissions are accounted for through that process.

Unknown Person – Is the removal of fuel an ERT?

Pete – Yes, even if it is later used as firewood.

Diane Nielson (UT) – There is no requirement to track where the fuel goes. So there is no responsibility for a state or tribe to track if the fuel was removed and used as firewood, which is an acceptable practice.

Lewis McLeod (Confederated Tribes of the Salish and Kootenai) – All 3 policies (ESMP, AEG, FTS) lose the trans-boundary issues. In the AEG there should be some method identified for computation toward a regional goal (e.g., NM/AZ goal).

Pete – In the ESMP there is a provision for regional coordination. In the AEG I don't know if a trans-boundary goal is viable given the ERT variability by source type and location. I think the AEG has more of a local application than a regional application. ESMP is probably the most viable application for your trans-boundary concerns.

Pete – The collaboration requirement does not place a limit on the involvement of inter-jurisdictional boundaries.

Asa Lavender (White Mountain Apache Tribe) – Does the cost per acre vary without ERT use and with ERT use, and what is that cost?

Pete – The collaboration effort is where that would best be discussed. There has been some work on costs in the GCVTC work.

Stanley – Is ditch burning for agricultural purposes counted?

Pete – Yes. Ditch burning is included in the emissions inventory for agricultural land. I'm not sure if there are ERTs for ditch burning but there are non-burning alternatives for ditch burning. This will be address in the further work on Appendix D.

Dan Olson (WY) – The FEJF did an outstanding job on a very complex issue with consideration of jurisdictional different issues. The FEJF consensus on the AEG Policy is recognized. The beauty of the work of the FEJF (all policies) is that they are viable techniques regardless of the 308/309 decision or other applicability (tribes severable portions).

Dan – Why does specific reference to the regulatory requirements need to appear in the Policy Statements? Especially since the Policy is prepared in such a way to be applicable in a variety of ways (308/309).

Pete – The Policy Statements tend to take a life of their own. The decision was made in the ESMP Policy to include the regulatory statements so people knew “where the box was”.

Justin Gould (Nez Perce Tribe) – I recognize the USFS 10 year plans. How much influence might there be to secure funding from the fire budget to bring funding to the tribes? I ask this because I am concerned about how to implement the WRAP fire policies and put teeth into it.

Pete – Through various SIPs the mandates will be clear and there will be teeth in the requirements.

Rich Fischer (USFS) – The USFS is currently trying get a better link internally between the air and fire personnel so that they can better address issues in the future. The planning process is a NEPA action so people can get involved through that process. Direct coordination with the forest and region personnel is also a very good option.

FTS Policy Questions

Brian Finneran (OR) – How does the FTS Policy address burning going on currently without a SMP or other authorizing mechanism (e.g., rangeland burning)? Will an estimate of burning be required for the FTS?

Pete – Yes.

Andy – For Policy Statement D, 1-year and 5-year projections are discussed but the planning process for the FLMS is on a 10-year timeframe. Can the 10-year projections from those planning activities be added into the FTS Policy?

Pete – The coordination to do this exists elsewhere already.

Andy – A discussion of Policy Statement C does not appear in Appendix C. It should be mentioned in Appendix C as well as mentioning non-burning alternatives in Appendix C.

Note by Darla: Appendix C is intended to be supporting information only and only contains sections where additional information could be provided. Perhaps we would make that clear up front in Appendix C so that people don't think there is a section for everything discussed in the body of the document. This Appendix was never intended to be like that prepared for ESMP, which is what people are comparing it to and is a very slippery slope!

Rich – I'd like to provide some relevant information pertinent to Policy Statement E. The USFS is establishing a national approach to tracking and OAQPS is interested in what we are doing. We are looking at three methods: 1) remote sensing, 2) on the ground tracking, and 3) modeling. The concept is to merge the best aspects of each technique.

Diane – What concurrence is the FEJF looking for from the Board today? 1) Consensus approval on the entire ESMP Policy document, 2) Consensus approval on the AEG Policy Statements, 3) Provisional approval of the FTS Policy Statements pending results of comments, and 4) Concurrence on the white paper (non-burning alternatives) and future FEJF activities.

Ric Tobin (AZ) – I have concern about giving provisional approval while the comment period is still open.

Andy – I would like to see the Board provide direction to the FEJF on preparing the white paper on non-burning alternatives.

Andy – In light of the 309 SIP schedule, the Board should approve the FTS Policy before the next Board meeting. A process similar to that used for the ESMP Policy would be OK.

WRAP Board Actions

- The ESMP Policy (tab 4 in the briefing book) was given consensus approval.
- The AEG Policy Statements A-G (tab 5 in the briefing book) were given consensus approval.
- The WRAP Board concurred that the FEJF should be thanked for its effort on the AEG Policy and directed to incorporate changes into the body of the document based on the comments received during the review period.
- The WRAP Board concurred that the FEJF should be thanked for its effort on the FTS Policy and look forward to the end of the comment period. The WRAP Board concurred that they will entertain the FEJF coming back to the Board via a modern mode of communication (i.e., e-mail or conference call) prior to the next Board meeting for approval of the FTS Policy.
- The WRAP Board concurred that the FEJF should produce a white paper on non-burning alternatives.