

GUIDANCE FOR CATEGORIZING
NATURAL vs ANTHROPOGENIC FIRE EMISSIONS

DRAFT V-05

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EXECUTIVE SUMMARY

In 1999, the U.S. Environmental Protection Agency (EPA) promulgated rules in an effort to improve air quality in select national parks and wilderness areas. The Regional Haze Rule (RHR) calls for state and tribes to work with federal agencies to improve visibility in 156 national parks and wilderness areas such as the Grand Canyon, Yellowstone, and Glacier. The RHR requires states and tribes, in coordination with federal land managers and other interested parties, to develop and implement air quality protection plans to reduce the man-made air pollution that causes visibility impairment.

The Western Regional Air Partnership (WRAP) is a collaborative effort of states, tribes, federal land managers and other interested parties, brought together by WRAP, to develop technical and policy tools needed by western states and tribes to develop and implement regional haze visibility protection plans.

This WRAP 2004 Guidance on Categorizing Natural Verses Anthropogenic Fire Emissions (WRAP 2004 Guidance) was developed over a four-month period through a stakeholder-based consensus process to assist WRAP region burners and regulators in categorizing fire emissions.

This WRAP 2004 Guidance does not alter or change the categorization policy set forth in the WRAP 2001 Policy for Categorizing Fire Emissions document (WRAP 2001 Policy). Rather, this WRAP 2004 Guidance provides a source of consistent research, field procedures, maps, plans, etc. (categorization methods) to be used by burners and regulators when categorizing fire emissions as either “natural” or “anthropogenic”.

Identifying categorization methods through consensus prior to categorization provides burners and regulators with information for categorizing fire emissions that is uniform and defensible. This WRAP 2004 Guidance may, in part, streamline the implementation of state and tribal regional haze implementation plans by reducing time spent on potential disputes over emission categorization.

Interested parties have the capability, at any time, to review and comment on fire categorizations, procedures, and methods reported as part of a state or tribe regional haze implementation plan. Therefore, reference to interested parties as users of this WRAP 2004 Guidance is limited. Interested party access to tribal categorizations, processes, and methods is a matter between those parties.

Categorizing emissions will support states and tribes in tracking fire activity efforts in their respective jurisdictions using a fire tracking system. This information is essential for creating an accurate fire emissions inventory. The fire emissions inventory is used in regional modeling to demonstrate reasonable progress toward the 2064 natural conditions goal.

The WRAP 2001 Policy addressed emissions from agricultural burning and Native American traditional, cultural, and religious burning. The WRAP 2001 Policy determined that emissions from agricultural burning could only be categorized as anthropogenic. Additionally, the WRAP 2001 Policy determined that emissions from Native American traditional, cultural, and religious burning could only be categorized as natural. Native American prescribed burning may be categorized as either natural or anthropogenic based upon the primary and predominant purpose for the burn.

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1. INTRODUCTION

1.1 BACKGROUND

The WRAP, as the successor to the Grand Canyon Visibility Transport Commission (GCVTC), is charged with implementing the GCVTC Recommendations, of which includes the RHR. The WRAP Fire Emissions Joint Forum (FEJF) was established to develop policy and technical tools to address smoke effects caused by wildland and agricultural fire.

In 1999, FEJF formed the Natural Background Task Team (NBTT) to develop a methodology to categorize fire emissions as either “natural” or “anthropogenic” in order to provide a basis for fire’s inclusion in natural background condition values and for tracking reasonable progress goals toward the 2064 natural conditions goal.

On November 15, 2001, NBTT completed the WRAP 2001 Policy document. The WRAP 2001 Policy is comprised of two main sections: Classification Criteria and Classification Program Management. The Classification Criteria section determines the natural and anthropogenic sources of fire that contribute to regional haze, as stated in the Preamble to the RHR. The Program Management section expresses the prerequisites that enable classification to be effective and equitable.

For purposes of this WRAP 2004 Guidance, terms such as “Agriculture Land”, “Burn Unit”, “Escaped Prescribed Fire”, “Prescribed Fire”, “Smoke Management Program”, “Rangeland”, “Wildfire”, “Wildland Fires Managed for Resource Objectives (WFUs)”, and “Wildland” are defined in Appendix A.

1.2 PURPOSE

The purpose of this WRAP 2004 Guidance is to identify consistent research, field procedures, maps, plans, etc. (categorization methods) used by burners and regulators when categorizing fire emissions as either natural or anthropogenic.

The WRAP 2001 Policy allows fire emissions from prescribed fire to be categorized as natural only through a determination by the burner, with regulatory oversight, that the fire is in an area identified as being in an ecologically functional and fire resilient condition. This determination may be made, in part, through the fire regime condition class process that considers both live and dead fuel loadings. Other available categorization methods include, but are not limited to, scientific research, agency and/or professional society publications, or management plans.

This WRAP 2004 Guidance acknowledges that fire emission categorizations are variable. For example, the activity of prescribed burning is normally categorized as anthropogenic since the effect is ecosystem restoration. However, there are instances when emissions from prescribed burning and fires managed for resource benefits (WFUs) are categorized as natural, since the effect may be ecosystem maintenance.

Identifying categorization methods through consensus prior to categorization provides burners and regulators with information for categorizing fire emissions that is uniform and defensible. This WRAP 2004 Guidance may, in part, streamline the implementation of state and tribal regional haze implementation plans by reducing time spent on potential disputes over emission categorization.

1.3 SCOPE AND APPLICABILITY

This WRAP 2004 Guidance applies to both wildland and agricultural lands regardless of ownership (i.e., federal, state, tribal, public, or private), or cause of ignition (e.g., lightning, arson, accidental human, land management ecosystem health). This WRAP 2004 Guidance must be applied equitably across all land types and emission sources. However, it does not apply to other open burning activities on residential, commercial, or industrial property (e.g., backyard burning, garbage incineration, residential wood combustion, construction debris).

The WRAP 2001 Policy addressed emissions from agricultural burning and Native American traditional, cultural, and religious burning. The WRAP 2001 Policy determined that emissions from agricultural burning could only be categorized as anthropogenic. Additionally, the WRAP 2001 Policy determined that emissions from Native American traditional, cultural, and religious burning could only be categorized as natural. Native American prescribed burning may be categorized as either natural or anthropogenic based upon the primary and predominant purpose for the burn.

The WRAP 2001 Policy states that fire emissions should be managed to minimize their impacts on visibility in Federal Class I areas, in addition to public health and nuisance concerns. It is recognized that burners and regulators need to agree upon methods used to categorize fire emissions prior to the implementation of state or tribal regional haze plans. Burners are required to categorize burns, with regulatory oversight. However, many burners face the problem of managing land that is encompassed by, or is adjacent to, jurisdictions with dissimilar regulations (e.g., adjacent states or tribal lands within states).

If states and tribes employ different regulatory requirements, the burner may be in compliance with one jurisdiction while violating another. This fact will complicate the process of categorizing fire emissions and determining progress toward the 2064 natural conditions goal. It may further subject the burner to

inconsistent enforcement actions that may be taken by states and tribes. Therefore, it is necessary to develop a procedure for burners to categorize fire emissions that is uniform and defensible.

The RHR outlines requirements for states and tribes to address regional haze in mandatory Federal Class I areas. The WRAP 2001 Policy acknowledges that the person(s) or entity that initiates a fire or manages the land where fire occurs is responsible for categorizing emissions with regulatory oversight. This WRAP 2004 Guidance considers regulatory oversight to be predominantly in the form of collaboration and assistance when necessary and/or when requested by the burner or interested party.

A state or tribe may elect to adopt elements of the WRAP 2001 Policy or WRAP 2004 Guidance as State Implementation Plan or Tribal Implementation Plan regulations. These elements may be an integral component of the permanent and enforceable measures developed to mitigate visibility impairment. Regulators may develop a process of reviewing categorizations which may be considered as a compliance / enforcement activity of the regional haze implementation plan.

Categorizing emissions supports states and tribes in tracking fire activity efforts using a fire tracking system that provides information essential to creating a fire emissions inventory. The fire emissions inventory is used in regional modeling to demonstrate reasonable progress toward the 2064 natural conditions goal.

2. 2001 WRAP POLICY STATEMENTS

The WRAP 2001 Policy set forth directives on how fire emissions will be categorized as either natural or anthropogenic. The following WRAP 2001 Policy statements are relevant to this WRAP 2004 Guidance and are included herein for purposes of continuity between documents.

2.1 BURNERS MAKE INITIAL FIRE CATEGORIZATION - REGULATORS PROVIDE OVERSIGHT

Page 12 - "For the categorization of fire emissions to function appropriately, the person(s) or entity that initiates a fire or manages the land where fire occurs is responsible for determining the classification using this Policy, with oversight by the applicable air quality regulatory authority."

2.2 ALL FIRES WILL BE MANAGED TO MINIMIZE EMISSIONS

Page 10 – *“This Policy statement addresses the pressing need that all fires, regardless of subsequent classification as “natural” or “anthropogenic,” must be managed to minimize their impacts on visibility in Federal Class I areas, in addition to public health and nuisance concerns.”*

2.3 TRACKING FIRE EMISSIONS

Page 12 – *“Emissions from all fire will be tracked for the purposes of demonstrating reasonable progress.”*

2.4 PRESCRIBED FIRE

Page 13 – *“Prescribed Fire is an “anthropogenic” source, except where it is utilized to maintain an ecosystem that is currently in an ecologically functional and fire resilient condition, in which case it is classified as a “natural” source.”*

Page 13 – *“The primary distinction in classifying prescribed fire is between “ecosystem restoration” and “maintenance”. Only prescribed fire used to “maintain” an ecosystem is classified as “natural”. All other prescribed fire, including restoration of ecosystems, is classified as “anthropogenic.”*

Page 14 – *“A “natural” classification may only be assigned to a prescribed fire when the person(s) or entity that initiates the prescribed fire determines that the fire is in an area identified as being in an ecologically functional and fire resilient condition. Further, the “natural” classification will only hold if maintenance of the area’s ecosystem is the primary and predominant purpose of the burn.”*

2.5 SUPPRESSED BY MANAGEMENT ACTION (WILDFIRE)

Page 15 – *“A wildfire is any unwanted, non-structural fire that can occur on wildlands, where there may be few scattered structures, or agricultural lands. Unwanted wildfires can be ignited by both natural causes such as lightning or human causes such as accidental human ignitions, escaped prescribed fires, or arson.”*

Page 15 – *“Wildfire that is suppressed by management action is a “natural” source. Wildfire, when suppression is limited for safety, economic, or suppression resource limitations, remains a “natural” source. Wildfires managed for resource objectives are classified the same as prescribed fires.”*

Page 16 – *“The ability to control the emissions from wildfires under suppression is limited, which was the underlying principle for the inclusion of this source in the “natural” classification. Further, the fact that in most instances, everything possible is being done to suppress the fire safely and economically also supported a “natural” source classification.”*

2.6 MANAGED FOR RESOURCE OBJECTIVES (WFUs)

Page 17 – *“The underlying principle guiding the classification of these fires is the potential for emissions management and/or control, which is the same as that of prescribed fires. The classification in these instances, just like prescribed fire, is based on the ecological condition of the land. Therefore, a wildfire managed for resource objectives will be treated as a prescribed fire and classified according to the same criteria.”*

2.7 ESCAPED PRESCRIBED FIRE

Page 17 – *“An escaped prescribed fire is any fire ignited by management actions on wildland or agricultural land to meet specific objectives, that goes out of prescription (e.g. fire intensity greater than specified in a pre-set fire plan, pre-set wind speeds exceeded, fire jumps pre-established boundaries, etc.) in a pre-defined geographic area.”*

Page 17 – *“The few prescribed fires that do escape become wildfires, and require appropriate suppression action by the land manager. The underlying principle guiding the classification of these fires is the recognition that the ability to control the emissions from escaped prescribed fires is limited, which is the same as that of wildfires under suppression. Therefore, an escaped prescribed fire will be treated as a wildfire under suppression.”*

2.8 NATIVE AMERICAN CULTURAL BURNING

Page 18 – *“Native American cultural burning for traditional, religious, and ceremonial purposes is a “natural” source.”*

Page 18 – *“A “natural” classification may be assigned to a Native American cultural burn when the person(s) or entity that initiates the vegetative burn determines, with oversight by the designated tribal air quality regulatory authority or EPA, that the fire has been established by the tribal government for a traditional, religious, or ceremonial purpose.”*

2.9 NATIVE AMERICAN PRESCRIBED BURNING

Page 18 – *“All other Native American vegetative burning (not otherwise for traditional, religious, or ceremonial purposes) is prescribed fire and will be classified accordingly.”*

2.10 AGRICULTURAL BURNING

Page 13 - *“A prescribed fire is any fire ignited by a planned management action to meet specific objectives on agricultural land or wildland, regardless of land ownership.”*

Page 13 – *“The primary distinction in classifying prescribed fire is between “ecosystem restoration” and “maintenance”. Only prescribed fire used to “maintain” an ecosystem is classified as “natural”. All other prescribed fire, including restoration of ecosystems, is classified as “anthropogenic.”*

Page 14 – *“A “natural” classification may only be assigned to a prescribed fire when the person(s) or entity that initiates the prescribed fire determines that the fire is in an area identified as being in an ecologically functional and fire resilient condition. Further, the “natural” classification will only hold if maintenance of the area’s ecosystem is the primary and predominant purpose of the burn.”*

Page 15 – *“Prescribed fire may be utilized for purposes other than ecosystem restoration and maintenance. It may be conducted for the purposes of vegetative residue disposal (e.g. timber slash or wheat stubble burning). Prescribed fire may be used to increase or maintain agricultural and silvicultural output or forage values. Fires may also be utilized to control weeds, pests, and diseases, and improve yield (e.g., grass and rice field burning).”*

3. CATEGORIZATION PROCESS

Fire emissions may be categorized as either natural or anthropogenic. Categorizations may be performed, in part, through the use of the fire regime condition class process that considers both live and dead fuel loadings. There may be situations when burners need to verify categorization for the purposes of regulation or public involvement. Therefore, the need to provide categorization methods for categorization is critical. Figure 1 illustrates the categorization process.

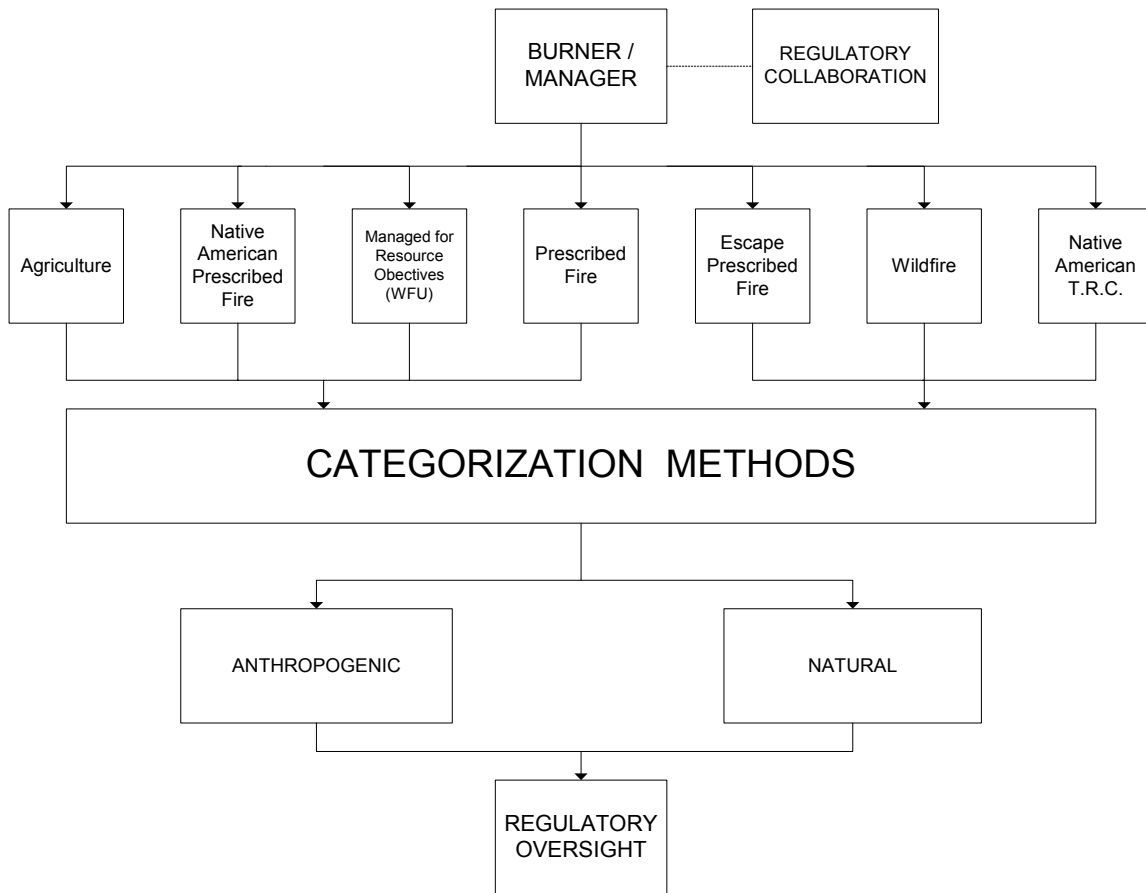


FIGURE 1

CATEGORIZATION PROCESS

The 2003 Policy for Fire Tracking Systems (WRAP 2003 Policy) outlines seven essential components necessary to calculate fire emissions and to uniformly assess impacts to regional haze. “Date of Burn” is one essential component. Section 3.3.1 of the WRAP 2003 Policy states that the temporal resolution of fire activity be attributed to a specific burn on a specific day in order to correlate fire emissions with the 20 percent “best” and 20 percent “worst” day visibility monitoring data.

Policy statements supporting the categorization process recognize the spatial and temporal variability of fire emissions and the significance in determining natural background condition values and for tracking reasonable progress goals toward the 2064 natural conditions goal. Spatial considerations include fire emissions from landscape to burn unit scale. Temporal consideration includes fire emissions generated on a daily (24-hour) basis generated from burner accomplishment reports.

3.1 PARTIAL CATEGORIZATION OF FIRE EMISSIONS

Statement: Fire emissions from a specific burn on a specific day will be wholly categorized as either natural or anthropogenic. Partial categorizations of burn units are not recognized.

The intent of the WRAP 2001 Policy is that fire emissions be categorized based upon the primary and predominant purpose for the fire. The WRAP 2003 Policy confines fire emissions tracking to a daily basis. Therefore, this WRAP 2004 Guidance does not recognize partial categorization of fire emissions from a specific burn on a specific day. For example, a specific burn ignited on a specific day cannot be categorized as having 30 percent natural and 70 percent anthropogenic fire emissions.

3.2 REVISIONS TO BURN CATEGORIZATION

Statement: Categorizations may be revised, prior to ignition, with regulatory oversight. Categorizations cannot be revised following ignition.

States and tribes will most likely regulate fire emissions through a form of smoke management program (SMP). It is through the SMP that burners / managers will identify fire categorizations and track fire emissions for purposes of demonstrating reasonable progress toward the 2064 natural conditions goal.

This WRAP 2004 Guidance recognizes that burners may need the flexibility to revise categorizations submitted to the SMP in order to maintain accuracy in fire emissions reporting. Through the SMP, regulators will be able to track final categorizations prior to ignition. Categorizations cannot be revised following ignition except during an escaped prescribed fire or in some instances when a WFU exceeds pre-defined management conditions. In these situations, emissions will be categorized as natural.

NOTE: We have a suggestion to revise Statement to allow categorizations to be revised following ignition based upon actual post-burn accomplishments.

Editor's Position: Do not allow for revised categorizations following ignition.

- *Too much opportunity to abuse intent of burn 'primary purpose'.*
- *May interfere with fire tracking and emission inventory processes.*
- *Revised categorization would indicate failed burn plan implementation.*
- *May not result in any perceptible change in reasonable progress.*
- *Burdens regulators to verify changes – raises enforcement / compliance issues.*
- *Will not conform to EPA requirements for permanent and enforceable control measures if categorizations may be revised following ignition.*
- *The original daily "go"/ "no-go" decision was made based upon the mixture of natural and anthropogenic emissions, by airshed. Revisions will give reason for regulators to be overly conservative with daily restrictions.*

3.3 VERIFICATION OF FIRE EMISSIONS CLASSIFICATION

Statement: Upon request, the person(s) or entity that initiates a fire or manages the land where fire occurs must make available information substantiating any fire emissions categorization.

As outlined in Section 2 above, the burner is responsible for categorizing fire emissions with regulatory assistance. For practical terms, the exchange of information between burners and regulators relevant to verifying fire emission categorization may occur as necessary.

Burners / managers should recognize that state and tribal regulators may have existing regulations that define fire emissions as either natural or anthropogenic for purposes of regulating open burning activities within their jurisdiction. This 2004 Guidance recommends that burners / managers consult with state and/or tribal air quality regulators prior to ignition.

3.4 UNIVERSE OF ACCEPTABLE CATEGORIZATION METHODS

Statement: Categorization methods are not limited to those identified within this WRAP 2004 Guidance. Tables 1 and 2 may also provide examples of information categories used for comparing future sources of scientific research, field techniques, maps, etc.

Tables 1 and 2 outline state-of-the-knowledge information relevant for determining the ecological functional and fire resilient condition of an ecosystem treated with prescribed fire. It is recognized that other sources of information will become available for categorization. Therefore, Tables 1 and 2 should be viewed as providing examples of information burners and regulators may use for categorization. Future information should pass an “applicability” test to this information.

3.5 EMISSIONS FROM ESCAPED WFUs

Statement: Emissions resulting from WFUs that exceed defined management conditions will continue to be treated as a prescribed fire and categorized according to the same criteria.

Page 17 of the WRAP 2001 Policy categorizes WFUs as prescribed fires. It stands to reason that emissions from a WFU that exceed pre-defined management conditions remain categorized as a prescribed fire. This is different than how emissions from an escaped prescribed fire are treated. Page 17 of the WRAP 2001 Policy states that escaped prescribed fires are those ignited by management actions. Emissions resulting from an escaped prescribed fire will be treated as a wildfire under suppression and be categorized as natural.

TABLE 1

CATEGORIZATION METHODS FOR ANTHROPOGENIC EMISSIONS

FIRE TYPE	CATEGORIZATION METHOD
<p>Prescribed Fire</p> <p>- or -</p> <p>Rangeland Fire</p> <p>- or -</p> <p>Native American Prescribed Fire</p> <p>- or -</p> <p>Managed for Resource Benefits (WFU)</p>	<ul style="list-style-type: none"> • Fire regime condition - Class II or III. http://www.frcc.gov/ 1. Standard Landscape Method. - OR - 2. Landscape Scorecard Method. • Scientific research, including, but not limited to: University publications; research facility bulletins or papers; professional society publications; or credible contracted services. • Fire Management Plan and other land management planning documents. • Wildland Fire Implementation Plan (WFIP). Wildfire Situation Analysis (WFSA).
<p>Agricultural</p>	<ul style="list-style-type: none"> • All activities meeting the definition of PL 104-127, Section 1240A.
<p>Wildfire</p>	<ul style="list-style-type: none"> • Not applicable.
<p>Escaped Prescribed Fire</p>	<ul style="list-style-type: none"> • Not applicable.
<p>Native American Traditional, Cultural, or Religious</p>	<ul style="list-style-type: none"> • Not applicable.

TABLE 2

CATEGORIZATION METHODS FOR NATURAL EMISSIONS

FIRE TYPE	CATEGORIZATION METHOD
<p>Prescribed Fire</p> <p>- or -</p> <p>Rangeland Fire</p> <p>- or -</p> <p>Native American Prescribed Fire</p> <p>- or -</p> <p>Managed for Resource Benefits (WFU)</p>	<ul style="list-style-type: none"> • Fire regime condition - Class I. http://www.frcc.gov/ 1. Standard Landscape Method. - OR - 2. Landscape Scorecard Method. • Scientific research, including, but not limited to: University publications; research facility bulletins or papers; professional society publications; or credible contracted services. • Fire Management Plan and other land management planning documents. • Wildland Fire Implementation Plan (WFIP). Wildfire Situation Analysis (WFSA).
<p>Agriculture</p>	<ul style="list-style-type: none"> • Not applicable.
<p>Wildfire</p>	<ul style="list-style-type: none"> • Wildfire Implementation Plan (WFIP). Wildfire Situation Analysis (WFSA). • Fire Management Plan.
<p>Escaped Prescribed Fire</p>	<ul style="list-style-type: none"> • Wildland Fire Situation Analysis – WFSA. • Fire Management Plan.
<p>Native American Traditional, Cultural, or Religious</p>	<ul style="list-style-type: none"> • Identified through tribal government resolution, rule, or ordinance.

APPENDICES

APPENDIX A GLOSSARY

Agricultural Land¹ - Agricultural land includes croplands, pasture, and other lands on which crops or livestock are produced (PL 104-127, Section 1240A). Rangeland will be included with wildland for the purposes of the Fire Emissions Joint Forum work.

Burn Unit – A specific activity area occupied by any type of fire, regardless of ownership, cause of ignition, or purpose. Emissions from burn units will be tracked on a daily (24-hour) basis.

Escaped Prescribed Fire¹ - Any fire ignited by management actions on wildland or agricultural land to meet specific objectives that goes out of prescription (e.g. fire intensity greater than specified in a pre-set fire plan, pre-set wind speeds exceeded, fire jumps pre-established boundaries, etc.) in a predefined geographic area.

NAAQS¹ – National Ambient Air Quality Standards.

Prescribed Fire¹ - Any fire ignited by management actions to meet specific objectives (i.e., managed to achieve resource benefits).

Rangeland¹ - Land on which the historic climax plant community is predominantly grass-like plants, forbs, or shrubs. Includes lands re-vegetated naturally or artificially when routine management of that vegetation is accomplished mainly through manipulation of ecological principles. Rangeland includes natural grasslands, savanna, shrublands, most deserts, tundra, alpine communities, coastal marshes and wet meadows (Natural Resources Conservation Service National Range and Pasture Handbook, 1997.)

Smoke Management Program (SMP)¹ – The objectives of a basic or enhanced smoke management program are to ensure: (1) no health-based NAAQS are exceeded; (2) nuisance smoke is mitigated; and (3) smoke impacts on visibility are minimized in Class I areas and meet the Grand Canyon Visibility Transport Commission Recommendations.

Wildfire¹ - Any unwanted, non-structural fire.

Wildfire Managed for Resource Objectives (WFU)¹ - The management of naturally ignited fires, regardless of land type or ownership, to accomplish specific, pre-stated resource management objectives in predefined geographic areas with or without a plan in place. This term is considered to be analogous with the terms Wildland Fire Managed for Resource Benefits and Prescribed Natural Fire that are used in regulations and policies regarding Federal wildlands.

Wildland¹ - An area where development is generally limited to roads, railroads, power lines, and widely scattered structures. The land is not cultivated (i.e., the soil is distributed less frequently than once in 10 years), is not fallow, and is not the USDA Conservation Reserve Program (CRP). The land may be neglected altogether or managed for such purposes as wood or forage production, wildlife, recreation, wetlands, or protective plant cover (EPA Interim Air Quality Policy on Wildlands and Prescribed Fires). The land is not “agricultural land” as operationally defined above. Silvicultural land and rangelands (per the FEJF charge), woodlots, and private timberlands will be included with wildlands for the purpose of the FEJF work.

1 From Appendix A of the WRAP 2001 Policy for Categorizing Fire Emissions.

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