

Land Manager Perspectives

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- FLM Perspectives on the 309 Process
- FLM Recommendations on the 308 Process
- Private Land Perspectives on the RHR
- National Fire & Air Issues Coordination Group
- Federal Legal Perspectives on Smoke Management

FLM Perspectives on the 309 Process

- General
 - Concern over equity in ESMP application to all potential fire sources
 - SIP/Rule development processes very rushed which limits creative solutions
 - Concern over technical support for decisions and exemptions

FLM Perspectives on the 309 Process

- Inclusion in stakeholder process was great and valuable
- Template (STIP II) use was a timesaver
- Pre-established policies and approaches helped reduce development and review effort
- The more inclusive and open the process, the better it worked for FLM community
- Collaborative partnerships and workgroups worked well
- Use of facilitators useful

FLM Fuels Management Mandate

- National Fire Plan
- Healthy Forest Restoration Act
- Administration and Legislative Mandate to address wildland fuels
- Gubernatorial support for fuels management
- FLM's working to balance objectives...Land Management Planning

FLM Recommendations on the 308 Process

- Please use broad stakeholder process
 - SIP / Rules / Programs
- Early FLM involvement
- Required consultation in overall SIP development
- Address equity among fire sources
- Support decisions for exemptions on sound technical grounds (CAA Section 118)
- Develop and utilize SIP/Rule Templates (consistency is helpful)
- Allow enough time for creative solutions to be developed-SMP, ESMP, Tracking, Goals,

FLM Recommendations on the 308 Process

- 309-type Annual Emissions Goal compromise approach is viable for addressing controlling anthropogenic fire sources
- A fixed Cap approach potentially contravenes goals of National Fire Plan
- Control measures (ERT's) are local and site specific actions: not applicable at landscape level
- FLM's are willing partners to develop new SMP's and enhancing SMP's

FLM Recommendations on the 308 Process

- Utilize EPA Interim Guidance Principles
- FLM's developing Fuels Management Plans, Community Wildfire Protection Plans, and revising Land Management Plans
 - AQ Regulatory Agencies key reviewers, participants partner in technical assessment