

# **NATIONAL FIRE/AIR ISSUES COORDINATION GROUP**

## **Prioritized Issues the Group Will Address where there is Need for Leadership, Consistency, and Coordination**

**Development of Consistent Fire/Air Policies as Appropriate** – The Group will review Agency and Bureau fire/air policies and guidelines for consistency and coordinated implementation of the goals, actions and policies in the National Fire Plan and the Federal Wildland Fire Management Policy. After conducting the review the Group will develop recommendations to address any inconsistencies and report our findings and recommendations to WFLC Coordinators. There are a number of policy differences among our agencies and bureaus including but not limited to requirements for smoke management training, determination of how we address visibility impacts in Class I national parks and wildernesses and other areas, smoke monitoring requirements, and highway safety relative to smoke. To the degree appropriate, we should have consistent fire/air policies and guidelines to effectively integrate fire, air quality and other land and resource programs and maintain credibility with our air regulatory agency partners.

**Coordination between Agencies and Bureaus** – The Group will develop a communication strategy to keep all the Agencies and Bureaus apprised of fire/air issues that may impact implementation of the National Fire Plan. There are many air quality regulatory and policy changes currently being proposed or addressed by States, Regional Planning Organizations (RPOs) and EPA. Those issues include: implementation of regional haze regulations; designation of non-attainment areas and resulting State Implementation Plan amendments for fine particulate and ozone; state and RPO development of fine particulate and ozone regulations; national air toxics inventories; IMPROVE sample analysis; definition and determination of fire's contribution to the natural background visibility; EPA natural events policy as it relates to fire; fire emission inventory development; resolution of legal issues; real-time fine particulate monitoring; and others. All federal land managers with responsibility to implement the National Fire Plan should be informed of these issues and use their collective expertise to participate in policy and technical forums as appropriate. The communication strategy will include conducting regular calls between agency and bureau members and establishing a web site devoted to Group activities and issues of interest.

**Development of a Consistent Wildland Fire Activity Tracking System to Support Development of a Comprehensive Fire Emission Inventory**- The Group will identify minimum data requirements for collection of fire activity data (prescribed fire, fire use, and wildfire) that can support consistent fire emission inventories. No one source can provide the complete emissions picture for fire. The Group will actively promote the integration of multiple sources of emission data (remote sensing, on-the-ground reporting and statistical estimation) to build a composite and more complete emission inventory. The Group will support efforts of EPA and RPOs in their development of fire emission inventories adequate to meet air regulatory and dispersion modeling needs. Good emission inventories are critical for development of fair and equitable air quality

regulations. For RPO activities, the Group will certify the final emission inventories as being representative of fire emissions on federal lands.

**Development of a Coordinated Strategy to Address PM 2.5, Ozone and Air Toxic Issues** – Congress, EPA, and the Courts are continually changing how national ambient air quality standards, visibility regulations, and other programs such as those related to air toxics are developed and implemented. EPA is required to periodically review established national ambient air quality standards (NAAQS) to determine if their form, level, and averaging times sufficiently protect human health and public welfare. Other pollutants such as air toxics may be regulated due to special concerns for their health or environmental effects. Fire emits five air toxics that EPA is currently addressing. The Group will conduct an analysis to determine potential impacts to prescribed fire programs of existing and potential PM 2.5, ozone, regional haze and air toxic standards, regulations, programs and/or policies. The Group will develop coordinated agency strategies to address these standards, regulations, programs and policies as appropriate. The Group will work with EPA to develop guidance for implementation of rules, goals, regulations, and policies for best addressing fire emissions in State air regulatory planning and regulation development.

**Coordination with RPOs, EPA, Tribes, State and Local Air Regulators and State Foresters** – The Group will interact with stakeholder forums and regulators to assure our concerns and collective expertise are considered in policy development. The Group will identify and participate in relevant RPO committees. The Group will work with State Forestry Associations to facilitate consistency in fire/air issues resolution, especially regarding emission inventory development, control strategies and Class I area visibility protection. The Group will work with appropriate staffs within EPA to coordinate work on a number of fire/air issues relating to implementation of fine particulate, ozone, and air toxics regulations and development of emission inventories and air monitoring strategies. The Group will notify and recruit appropriate federal, state, tribal, and local air quality individuals and organizations to assure that the issues of the Group are known and addressed by their participation.

**Facilitation of the Resolution of Air Quality Legal Questions that Impact Agency Fire Programs** – The Group will develop a list of fire/air related legal issues regarding federal agency responsibility and authority in complying with provisions of the Federal Clean Air Act and State and local air quality statutes and regulations. Some of these provisions have been interpreted inconsistently among and within our agencies resulting in confusion within our staffs and affecting our credibility with some States. From the national to the field level we need written uniform legal opinions relative to fire/air issues that our Agencies can support. The list of legal issues will be sent through the DOI Office of Wildland Fire Coordination and USDA Forest Service National Fire Plan Coordinators to the DOI Solicitor's Office and USDA Office of General Council for resolution.

**Identification of Time, Staff, Skills, Training and Budget Needs to Appropriately Address Fire Related Air Quality Issues** – The Group will review the workload staffing efforts to date to determine if the Agencies and Bureaus have the appropriate staff, skills, training and budget to meet the fire/air challenges. If necessary, the Group will identify joint smoke management staffing, skill, training and budgetary needs and make recommendations to the DOI Office of Wildland Fire Coordination and USDA Forest Service National Fire Plan Coordinators. At present the workload for the Fire/Air Issues tasks are estimated to be 7.6 to 10 years of work per year. Current staffing of national, regional and local offices have personnel that are working on multiple project priorities, which leaves fire/air issues with limited capabilities. The workload requires that a more dedicated workforce be established to meet the growing complexities including revised regulatory changes. The Group will also recommend staffing, training, and operational efficiencies that leverage the collective resources of agencies to better achieve objectives at minimum costs.

Initial Summary of Staffing Workload for Wildland Fire Smoke Management

	National	Regional	Local	Subgroups	Total
Coordination Meetings w/EPA, States, RPO's & Policy Development	3.5 – 5 years	2.5 – 2.6 years	1.5 – 2.5 years	.1+ years	7.6 – 10 years

**Development of Consistent Guidance on Planning and NEPA Issues** – The Group will conduct analysis of Agency and Bureau planning and NEPA guidance relative to fire/air issues and make recommendations for consistency as appropriate to the DOI Office of Wildland Fire Coordination and USDA Forest Service National Fire Plan Leader.

**Development of Real-time Fine Particulate and Other Air Quality Monitoring Strategies** – The Group will develop goals, objectives and a strategy for ambient air monitoring of fire emissions. The strategy will address when, where, how and who should conduct fire-related ambient air monitoring, if any, and for what purpose. The Group will identify candidate techniques, methods, hardware, networks, and delivery of monitoring capabilities. To the extent practical, the Group will leverage existing monitoring activities by agencies and regulators to maximize efficiency.

**Identification of Research Priorities to Meet Air Regulatory Needs** - The Group will conduct a meeting to develop recommendations on fire/air quality research needs and priorities to help respond to various air quality regulatory programs. Significant research has been conducted on fire/air issues during the past three decades. However, evolving air quality standards and regulations have resulted in the identification of new research needs that must be met if land managers are going to be effective participants and leaders in State and National air regulatory processes. The Group will first identify information needed to actively participate in the various regulatory processes and then conduct a

meeting in May, 2004 with appropriate regulators, researchers and research management to determine how to best meet those research needs. Results of the meeting will be distributed to WFLC, the Joint Fire Sciences Governing Board, and other appropriate research organizations.

**Development of Consistent Information for the Public on the Benefits of Smoke Management and the Air Quality Tradeoffs between Wildfire and Prescribed Fire –**

The Group will oversee the development of a media-ready assessment of the air quality tradeoffs between wildfire versus carefully planned programs for managing fire and smoke under prescribed fuel and weather conditions. The assessment will address the potential for prescribed fire to reduce emissions and avoid or minimize air pollution impacts on health, safety and visibility. A focus of the assessment will be on how we can treat wildland fuels using fire but significantly reduce air pollution emissions and impacts by biomass utilization (reducing fuels before burning), burning during optimum fuel moistures, increasing combustion efficiency, meteorological scheduling etc. Data from real-time fine particulate monitors has shown that wildfire is the air pollution source with the greatest potential of any source in the country to expose the public to extremely high short-term fine particulate concentrations. During the last few years large fires created air pollution problems for both firefighters and the public. In some cases the public was impacted hundreds of miles from the fire as a result of long-range transport. This information needs to be presented to our partners and the public in such a manner that it can be readily understood.

**Identification of needs for Model Development and Support for Modeling Centers –**

The Group will identify where predictive smoke models are lacking or in need of improvement to meet air regulatory needs. The Group will also coordinate with USDA Forest Service Fire Consortia for Advanced Modeling of Meteorology and Smoke (FCAMMS). To date, five consortia are in various stages of development and operation. If fully implemented the FCAMMS will provide national high resolution fire weather simulations, fire danger indices and smoke dispersion predictions from 48 to 72 hours in the future. The Group will monitor progress of the development of the USDA Forest Service Fire-CAMMS and recommend support from WFLC or individual organizations as appropriate.