

**Smoke Managers Subcommittee
Conference call
11.06.2012**

Roll Call:

**Mike Broughton, Colorado/USFWS
Claudia Standish, New Mexico/BLM State Office
Pete Lahm, Washington D.C./USFS
Brian Bohlmann, Wyoming/Air Quality Division
Leif Paulson, Wyoming/Air Quality Division
Gerald Barrett, California/Eastern Kern County APCD
Twale Abrahamson, Washington/Spokane Tribe
Ursula Parker, California/Butte County AQMD
Erin Law, Idaho/Idaho-Montana Air Shed Group
Karen Brooks, California/San Luis Obispo APCD
Rick Gillam, U.S. EPA, Southeast Region, Atlanta, Georgia
Christine Paulson, Iowa/DNR
Bill Chaney, Arkansas/Arkansas Forestry Commission
Paul Charland, Wisconsin/USFWS Region 3
Dar Mims, California/ARB
Gary Arcemont, California//San Luis Obispo APCD
Lawra Boyce, South Carolina/South Carolina DHEC
Jana Boulafentis, Nez Perce Tribe
Ethan Aumann, Bureau of Land Management
Brian Finnernan, Oregon/Oregon DEQ
Ann Hobbs, California/Placer County APCD
Mary Anderson, Idaho/DEQ
Jim Heil, North Carolina
Colleen Campbell, Colorado/Colorado APCD
Pat McLaughlin, Colorado/Colorado APCD
Rita Bates, New Mexico/New Mexico AQ Bureau
Kim Sumner, California/Siskiyou County APCD
Carol Blocksome, Kansas/Kansas State University
Jim Prevette, North Carolina/North Carolina Forest Service**

Mike Broughton gives a “shout out” to Jim Brenner (Florida/Forest Service) who could not make the meeting today due to his volunteering to help out at a local polling place on Election Day.

The purpose of the Smoke Manager’s Sub-Committee is to increase communications amongst the community of air quality professionals, other state and federal governmental agencies, land managers, and other persons conducting burning activities. Mike B. adds that this is a forum to share relevant technical information to further communication between those who conduct burning activities and those whose job is to protect air quality. Like politics and relationships, things work best when we cooperate with one another and not try to force our agendas on one another. Each area of the country has unique characteristics, but as long as we continue to work together, we will be able to accomplish our goals together.

Additional Agenda Items: Claudia noted that she was sending out the smoke cards; please contact Claudia if you have not received an email regarding this.

Agenda Item 1: EPA Regulatory Update: New PM2.5 Proposed Standards and Draft Exceptional Events - Rick Gillam

- **New PM2.5 Proposed Standards**

- Still on schedule to issue the final standard by December 14, 2012 (court-ordered deadline). The EPA is addressing the comments that were received regarding the proposed standards.
- PM is specified as PM2.5 and PM10. Proposal would likely:
 - Revise the level of the annual PM2.5 standard from 15 $\mu\text{g}/\text{m}^3$ to 12 to 13 $\mu\text{g}/\text{m}^3$ annually.
 - Retain current 24-hour PM10 standard at 150 $\mu\text{g}/\text{m}^3$.
 - Add a secondary visibility standard for urban areas
 - **Myfirecommunity.net website** - Rick gave kudos to the website and said that they're doing a great job keeping up to date with current EPA developments & wants to point out a couple of things on there:
 - Related to PM2.5, the posting on the top of the page relating PM2.5 with visibility is an interesting posting.
 - Mike B. stated that Susan O'Neill has been doing the lions' share of the PM2.5/Visibility issue.

- **Ozone Standard**

EPA is re-evaluating the ozone standard – the next revision is scheduled for 2014. The Clean Air Scientific Advisory Committee (CASAC) review of the EPA's ozone policy assessment document was interesting in that there was support for adequate evidence for EPA to lower the standard. [CASAC is the group of scientists who make recommendations to EPA (like academic researchers) - EPA then uses the recommendations to revise policy].

- **Secondary Visibility Standard/Regional Haze**

- **Air Quality Policy for Emissions from Prescribed and Wildfires** (frequently misrepresented as EPA's Fire Policy) - this is a revision of the 1998 interim policy. There have been recent "high level meetings at EPA recently regarding revision of the policy and there will be opportunity for public and agency input and review before EPA revises the policy. Bill Harnett (EPA) is heading up the review and a number of regional people, including Rick, are in the workgroup.
- **Exceptional Events:** draft guidance came out earlier this summer & EPA will be developing additional guidance 2013 to address ozone impacts. The state of Kansas has done a detailed assessment on ozone exceedances relating to burning in the foothills which is currently out for public review on their website: <http://www.kdheks.gov/bar/air-monitor/exceptevent/exevent.html>

- **National Inventory**

- EPA is updating national fire inventory and is looking for input from states. There is a formal request going out to state forestry as well (Pete Lahm). Info is requested by Dec 31st of this year. The deadline of Nov 1st to get info to EPA has passed.
- Websites with more info: EPA 2011 Wildland Fire National Emissions Inventory (NEI): <http://www.epa.gov/ttnchie1/net/2011inventory.html> & <http://www.airfire.org/emissions/2011nei/>
 - From Pete: AirFire is the group that is supplying data to support remote sensing portion of the inventory. The focus is 2011, but if you have any data from 2000-2012, regardless of who it comes from, they'll take it (NGO, Fed, State, Local, etc.). Info on fire activity will be used to develop assessments.
- Rick reminded the group about the webinar on Thursday, November 8th.

Agenda Item 2: Air Resource Advisor Training – Pete Lahm

- Staff in the Air Resource Advisor role have been working with the Forest Service to provide a workshop to give attendees some degree of proficiency of dealing with this situation. While there is no official recognition of what is necessary for the position, there is some knowledge necessary to be able to translate air quality forecasts, public health and safety messages, exposure to smoke to people working fire, and transportation safety (critical). Can be various assignments. Next year will be another building year. Incident Commander to Public Information Branch, bunch of different places where this position can fit.
- Last week, Pete addressed air quality managers at a regional meeting and gave a presentation about the air quality advisor functionality. A small workgroup was developed to try to determine how to best utilize this person and gather elements that would be helpful to know up front/preplan for someone in this position. This year WA, ID, MT, all used network of information to help determine action; there is great opportunity for land managers and states to communicate with one another. There has been a range of people that are interested: NPS, FWS, USFS, BLM, etc. Pete would like EPA folks and others to be interested.
- Key thing: right now, the only mechanism is working through state forestry. Need to determine how to transfer funds, determine how to provide for compensation. Contract agreements don't work very well if you are working for someone else. But it can work: Gary Cursio's contract is one example. Goal is determine what the wildfire - air quality response needs are. Addressing air quality impacts from wildfire requires removing the historic "laissez-faire" attitude. We need to be able to respond to the risks from wildfire smoke.
- Mike B: The historic approach has been, "...it's a wildfire and there is going to be smoke from it, so you'll just have to deal with the smoke." However, in some cases we've able to forecast for communities specific days that they are likely to be impacted and which days they could be more likely to go outside and take care of

outside activities. Mike B. was working with Mary Anderson with DEQ and Health in Idaho and they were able to tailor messages for certain areas based on forecast of air quality for certain areas. The public isn't as concerned about air quality when their area is being threatened with loss of life and property, but when one goes down the road a ways, air quality is a much bigger issue and people are increasingly more interested in what's going on. Mike B. had daily calls with Mary and the other folks. There's a lot that can be done. Have to decide when to close roads, where and when to monitor. For some areas, such as S. Carolina, that smoke can turn into "superfog," and it's helpful to know when you will need to respond appropriately. Working with the incident command system is still a relatively new program; we will need more people in the upcoming fire seasons for this so that we can efficiently rotate people out.

- Pete added that the workshop had requests for info on people's experience re: incident command and some people have stated that this is a huge amount of info – while for others it's simply a print out. But if not, brevity is good. The goal is to increase the # of people that can go out on these types of events. There will be a mentoring program. Some states have particular regulatory pieces that must be appropriately communicated (varies from region to region and state to state). It is an investment that is being built. Intergovernmental relationships are being developed in the process. Flexibility is key because this is a work in progress, and we are in a growth and learning phase.
- Mike B. was out for 40 days (on fires) and said that every fire was different. High Park, CO/WY area command, later in summer up in Idaho on the Halstead fire. Small duration fires don't need this type of position; it's for longer duration fires. You're working with different Incident Command Team, some don't understand your role, sometimes you work with health agencies, the media, and sometimes you don't know who you are supposed to work with and you have to figure it out.
- Pete commented that Incident Management Systems are helpful with communication plans, but at a certain point, incident by incident, you will have potential specific area needs in a local area if only to help to refine the modeling needed to protect a specific area. On the tribal side, there are sovereignty issues and you need to spend time to determine tribal impacts. Also, the commitment of going to that course requires a commitment from your employer that they will allow you to go to an incident.
- Claudia noted that sociopolitical differences across the country are complex, but we aren't in a vacuum. To have within these plans an orientation packet state by state to educate/link in people will be critical to address the variability socially & culturally. One of the real valuable things about this is that we are trying to create a shift in fire management. We aren't telling them what to do, just creating an awareness that smoke management is a part of what we're trying to deal with. We want to look at what we can ADD, so that people don't look at us like we are interfering.
- At this point, 11:05, Pete needed to depart call, but implored people that we have the ball rolling; there was a lot of recognition this year, but if this coming year is a slow fire year, we could lose some momentum. There is an opportunity for synergy. The

development of a 50-state guide on how to deal with this is important: for example, can we share monitors across state line? It's time to have an emergency response team so that monitors could be deployed/coordination of info in the event of any kind of air quality issue nationally.

- Brian Finneran (Oregon DEQ) asked how deployment would be considered - would it be assigned? Mike B. answered that this is something that we're working out. The Incident Management Team (IMT) makes the request. Claudia offered that the paying thing gets tough. This past season Pete Lahm orchestrated the orders, but if it becomes an actual position at some point, the request could come from any agency. Mike B. offered that, for example, for now requests can come from the Incident Management Team or could come from State Air Quality, stating that they want additional air quality support because they don't have ability to do it themselves. Pete would get that call and would then route the need to the right person. This is under development, but for now, Pete Lahm is the primary contact, and Claudia and Mike B. are secondary. This last year it was almost all Pete. In the next few months, more info will be available. The training will allow for more people to increase the pool.
- Mary Anderson/Idaho commented that her perspective is that it really helps the state agency. They're experts in air quality but not in fire. They had major long duration fires. It was easier to get information on the different burns when there was one person attending the briefings, etc. and they can pass that info along to the agencies. It's a fluid environment and a great opportunity to contribute. Mike B. asked that Mary be ready to provide her comments in writing so that there can be a properly communicated verbiage of value in the position. People want to know what's going on. Claudia comments that people deserve to know what's going on. Mike B. reiterated the different areas of responsibility in the position.

Next Agenda Item: Smoke Managers Contact List – Mike B. & Claudia

- Hopefully this info is easily accessible from the My Fire Community <http://myfirecommunity.net/Neighborhood.aspx?ID=279> page. The group is making an effort to get this list updated, but understand that it is fluid to some extent. **Each person on the call should look at that spreadsheet for your state and verify and/or ask for corrections by state (in California it will be by district).** There are tabs along the bottom: State forestry, tribal, FLM, etc. Please look at and get back to Mike B. and/or Claudia.

Next Agenda Item: Communication/Coordination Plans – Mike B.

- The Idaho/Montana Airshed Group and California each have existing plans. How well have these plans worked for these communities?
- Dar Mims (California Air Resources Board) commented that he thought that it worked extremely well. It's allowed for increased communication & coordination. Air Quality folks get anxious when PM #s go up. We are doing it in a consistent and coordinated

manner. Dar is looking forward to another season. Mike B. offered to those unfamiliar with the process (in a nutshell), during a continuing fire, the state or district air quality representatives get anxious about exceeding standards - they talk to Incident Commander who gets the message that the AQ folks want them to put the fire out quicker. The IMT doesn't want to be directed on how to fight a fire. This creates animosity. Putting these plans together provides a roadmap on how to communicate effectively during a dynamic situation. It is working well in CA and is working in ID and MT.

- Mike B. encourages states to work on putting such plans together; it's good to have an agreement in place **before** it's needed (and it's only a matter of time in some states). On the My Fire Community site <http://myfirecommunity.net/Neighborhood.aspx?ID=279>, the CA and ID/MT plans are posted - there is no reason to reinvent the wheel. Mary Anderson (Idaho DEQ) commented that there are some inconsistencies in their plan. For example, the Mustang Fire created very unhealthy impacts in Salmon, and IDEQ had a difficult time getting info once Area Command was shut down. Thomas Dzomba (MT/USFS) is the contact for ID/MT smoke coordination, but was deployed to CA during a lot of that time, so wasn't available and there was no back-up person identified. She added that they need not just high level but other Forest Service level contacts. Erin Law (Idaho) commented that the reason that it worked in ID was because Mary put in the effort to make sure that it worked. Part of the frustration is that there wasn't a consistent level of oversight in place. Mike B. asked Mary what steps could be taken to make sure that it works for next season. Mary stated that the biggest thing for them was to develop the relationships with the forest folks so that they know ahead of time. Dar Mims (CARB) commented that some of the growing pains come from trying to figure out each other's jobs and where to get the best information - all of this is being developed "on the fly". Getting everyone on the same page takes a great amount of effort.

Next Agenda Item: Reduction in Rx Burning Due to Litigation Fears – Ursula Parker

Ursula Parker, BCAQMD: The Moonlight fire was a large fire from five years ago (specifically September 3, 2007), where 46,000 acres of 65,000 acres were burned in USFS land. The fire was started on Sierra Pacific Industry (SPI) property by a heavy equipment operator who allegedly struck a rock. This summer it was made public that the government successfully sued SPI for \$55 million for destruction of forestland. Part of the settlement included the transfer of 22,500 acres of land from SPI to the federal gov't. (Note: research after the call requires clarification – SPI's portion of the settlement includes \$47 million, with the remaining \$8 million to be shared by a subcontractor and a group of landowners.) Ursula has heard from land managers that this precedent gives them reason to be alarmed. Not only are they concerned about liability from escaped burns, but they are concerned about even allowing access to property because they are worried about litigation.

- Carol Blocksome/Kansas: There was a lawsuit in Texas similar to this and now they're without insurance. They have a huge liability issue.
- Karen Brooks/San Luis Obispo, CA: SPI is California's largest private landowner and has a contentious relationship with agencies. They have "deep pockets" and once they've been sued it can be earth-shattering. If you're doing a Rx burn and you are following established procedures, you minimize the potential to get sued and maximize your

defense against getting sued; It's better to do Rx burn rather than not doing burning and (having a) lightning strike cause a larger fire. It's a balance that you have to strike.

- Mike B. brought up the Rx burn in Colorado this past spring that reignited and killed some people. Some people want to sue but it was an accident and the proper procedures were followed.
- Claudia added that the past couple of weeks, Rx fire smoke has impacted Albuquerque, NM. The burners may have done everything right. But when you look at ventilation, strong night time inversions, mixing heights that are not good, not a lot of dilution...it's not a lawsuit issue, but still an issue. Claudia dealt with phone calls from public. It's important to try to bring burners to the realization that what you do today has an impact over time. We need to be able to help guide the situation. The further out you are, the harder it is to be accurate. The issue is that people can be impacted from these activities. We are always looking for info to help guide the burners better to minimize impacts to public.
- Mike B. commented that it's the bigger burns that burn overnight and smolder that can be the problem. Burners can complain that it is harder for them to burn in the windows available, but it's important to look down the road and what is likely to happen in the future (if/when the piles smolder).
- Karen commented that there was an Assembly Bill that was introduced to try to limit civil liability in that case, but it died because it conflicted with some of the sections of the state constitution. It's important to try to work with land managers to get stuff done. Karen shared that their area is catastrophic. There are people that are in the business of teaching classes on fire behavior. They are all really trying to make it work for everyone.
- Mike B. commented that it is the squeaky minority that you hear from. If you aren't having problems, you don't hear about it. He didn't want to perpetuate that.
- Erin commented that the relationships that are established beforehand that affect the outcome. We need to be mindful that the bias exists and that we're working toward improving the relationships where there are problems.

Final Agenda Items:

- **Scheduling the Next Meeting** - Mike B. – We will have our next meeting sometime in late January, likely after Martin Luther King, Jr. Day. Mike will send out a Doodle poll before Thanksgiving (oops). Tuesdays or Wednesdays seem to be the best day.
- **Round Robin** - Brian F/Oregon: Looking for a multi-agency protocol (state health, governor's office, etc.) and if another state has an example along those lines, he would appreciate it. Dar Mims (ARB) offered that the CARPA website may have info that could be helpful.