

Prescribed Fire on Wildland: Addendum to the Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations

- **Workgroup Participants: WESTAR, AK, AZ, CO, MT, NV, OR, WA**



Key Elements of Draft Guidance

Weight of evidence versus documentation

Similarities to Ozone – Wildfire EE Guidance:

- Narrative conceptual model, clear causal relationship
- Tiered approach
 - EPA: most will be T3
 - Q/D

Differences from Ozone – Wildfire EE Guidance:

- Human activity unlikely to recur
- Not reasonably controllable/preventable

Key Areas of Comment

- **Applicability to other pollutants**
- **Tiering concept in general, use of Q/D**
- **Interstate impacts, differences in policy across state boundaries**
- **Prescribed fire on private lands**
- **Regulatory significance versus timing of submission**
- **Clarification regarding:**
 - **“Certified” Smoke Management Program**
 - **Evidence of previous events having been affected by Exceptional Events by still in historical record**
 - **EPAs authority over states’ burn/no-burn decisions**
 - **“Hybrid” approach**
 - **“Resource Management Plan” definition, substitutions**

Questions?

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