



## United States Department of the Interior

NATIONAL PARK SERVICE  
Fire Management Program Center  
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Boise, Idaho 83705-5354

N3615 (NIFC)

October 25, 1999

Ms. Ursula Kramer Trueman  
WESTAR Council President  
Western States Air Resources Council  
9 Monroe Parkway, Suite 250  
Lake Oswego, OR 97035

Dear Ms. Trueman,

We received your letter of August 25<sup>th</sup> and would like to provide a few clarifying points on smoke management procedures employed by the National Park Service as well as pledge our continued support of cooperative efforts to manage smoke associated with fire use.

### **Information Sharing**

We agree that there is a need to share real-time information concerning smoke from fire use activities so that better coordinated implementation decisions can be made. However, federal wildland prescribed fire agencies currently lack a national system for tracking planned and on-going prescribed fires. In recognition of this, the agencies are working with the National Interagency Coordination Center to develop a better process for reporting and tracking on-going fire use activities.

At the regional level, federal prescribed fire managers are working with individual state agencies in tracking planned activities. Notable progress has been made in Colorado, Montana, Arizona, and California. During periods of increased wildland fire activity, NPS has undertaken a daily conference call to better coordinate with local and state air quality organizations. This was a very effective information sharing technique in Idaho, Montana, Arizona, and California in 1998 and 1999. We also support the establishment of interagency smoke coordinator positions such as those recently established in Utah and Colorado. In addition, the National Park Service actively participates on the WRAPS FEJF and supports their efforts to find collaborative solutions to air quality problems.

While these efforts in information sharing are not perfect, they exemplify positive steps that NPS is taking. We have and will continue to provide basic fire use activity information upon request. However, it must be recognized that highly accurate timeframes and emissions for planned events are difficult to identify in advance due to uncertain weather variables.

## **Agency Commitment**

The National Park Service has made great strides during the past few years to ensure fire use managers are well-trained in smoke management policies, regulations, and impact mitigation techniques. Prescribed fire managers and burn bosses are required to complete smoke management training. We are committed to continuing this program of training at all levels.

Nationally, policy manuals have been updated to reflect the increasing need to mitigate impacts from fire use activities. A chapter on air quality has been included in Wildland and Prescribed Fire Management Policy Reference Manual 18, outlining procedures for minimizing impacts on the air resource. Several other chapters provide direction to minimize impacts from smoke associated with specific types of fire use. In addition, a new position hired at the National Fire Management Program Center has smoke management as a major job component. This position will ensure greater attention and coordination of air quality and fire management.

Regionally, steps are also underway to improve our agency's commitment. Several regions are in the process of hiring additional positions with duties comparable to the national position. Locally, fire management plans are being updated to reflect the new policy direction and guidance, increasing analysis requirements for smoke management. Local coordination with air quality organizations is improving and is being given high priority. This is illustrated by recently implemented daily conference calls during periods of high fire activity.

## **NEPA Analysis**

We need to alleviate your concern "about the widespread use of categorical exclusions for prescribed fires in the NEPA process." The current list of Categorical Exclusions (CEs) approved by the Director of the National Park Service (effective since 1982) does not include a CE for prescribed fire. Consequently, we do not utilize CEs for any fire use projects. Rather, we use environmental assessments (programmatic and project-specific) to analyze alternative fire hazard reduction and ecosystem restoration treatment methods that would potentially include fire use.

However, we agree that some of the older fire use planning documents did not address potential air quality impacts in the detail needed under current air quality conditions. Recently completed planning guidance has strengthened the requirements for analysis of potential impacts to air quality. Several planning and implementation requirements have been added to National Park Service Wildland and Prescribed Fire Management Policy Reference Manual 18, Chapters Four "Fire Management Plans" and Fourteen "Air Quality and Smoke Management", and other Resource Management and NEPA policy references.

We now require NPS units to evaluate non-burning alternatives for feasibility and to provide a rationale for selection of a fire use alternative.

- Fire management planners are directed to coordinate with and solicit input from the local state air quality regulatory agency during all phases of the fire planning effort.
- Managers are directed to consider potential smoke impacts when determining if a wildland fire should be managed for resource benefits.
- NEPA documents must identify current air quality conditions, expected emissions from alternative fire use actions, and mitigation measures that will be taken to minimize potential impacts.

### **Research**

The National Park Service has recognized that working cooperatively is better than working alone. With this in mind, we are participating in the Joint Fire Sciences Program. This program has funded several air quality research projects.

In conclusion, the National Park Service is committed to working with state air quality agencies and other prescribed burners to minimize smoke impacts to the public.

If you have any questions, please contact Tim Sexton at 208-387-5223 or Tom Zimmerman at 208-387-5215.

Sincerely,

Sue Vap  
National Fire Management Officer