

# WESTERN STATES AIR RESOURCES COUNCIL



August 25, 1999

Les Rosenkrance  
Director, Fire and Aviation Management  
Bureau Land Management  
US Department of Interior  
3833 South Development Ave.  
Boise, Idaho 83705

Dear Mr. Rosenkrance:

The Western States Air Resources (WESTAR) Council is an association of the state air regulatory agencies in the fifteen western states (AK, AZ, CA, CO, HI, ID, MT, ND, NV, NM, OR, SD, UT, WA and WY) and includes ex officio members from the Forest Service, the Fish and Wildlife Service, the National Park Service and the Bureau of Land Management. WESTAR recognizes that the use of fire is necessary to meet land management objectives, but we are concerned about the extent of the planned prescribed fires and wildland fires managed for resource benefits which have the potential to overwhelm the air resources of our region and cause unacceptable public health, welfare and visibility impacts.

Most western states have smoke management plans in place or are currently developing and implementing new smoke management programs. Representatives from your agency have been actively involved in the development of those plans and are entering into memoranda of understanding (MOU) with state air quality agencies where needed. We appreciate that participation and encourage your support of further cooperative efforts on smoke management. However, there are several areas of concern for all the WESTAR states such as the availability of information to enhance cross-boundary communication and coordination, agency commitment to air quality protection, NEPA analysis, and the need for continued smoke management research.

**Information Sharing:** There is no system for obtaining region-wide information on planned and on-going prescribed fire activity. This information is needed to coordinate and evaluate smoke effects on both a regional and local level by air quality and land managers. The availability of real-time information is critical to effective smoke management and directly impacts our efforts of ensuring that prescribed fire does not adversely affect human health, cause a public nuisance or impair visibility of Class I areas. The Western Governor's Association (WGA) is working on the acquisition of basic fire activity while the Western Regional Air Partnership's Fire Emissions Joint Forum (WRAP-FEJF) is working on fire emissions tracking which are both elements of this

9 MONROE PARKWAY, STE 250, LAKE OSWEGO, OR 97035  
PHONE (503) 387-1660 FAX (503) 387-1671

issue. We strongly support these efforts and will work through those forums to ensure that state specific needs are incorporated. We urge your agency to support these forums and to provide the needed basic fire activity information as soon as possible.

**Agency Commitment:** Your agency's recognition and commitment at all levels are needed to prevent and mitigate air quality impacts from fire. While active and willing cooperation in the development of state smoke management plans and regional efforts should prevent serious air quality impacts, mitigation of these impacts can only occur if there is full recognition of potential air quality ramifications at all levels within your agency. The western air directors have worked closely with your state/regional offices, and we are confident that those managers share our concerns about air impacts and are working to address them. However, we are not seeing that degree of understanding consistently at all levels within your agency. We strongly encourage your agency to continue working with your staff members to ensure that there is complete understanding of air quality issues related to fire, their implications and how they need to be addressed.

**NEPA Analysis:** Our review of documents prepared and decisions made by your agency under the National Environmental Policy Act (NEPA) shows that the air quality impacts associated with proposed prescribed fire projects have generally not been adequately or consistently evaluated and that alternatives to fire have not been adequately considered. We are especially concerned about the widespread use of categorical exclusions for prescribed fires in the NEPA process. Given the potential for air quality impacts, prescribed fire should not be categorically excluded. Even if the ultimate result is a finding of no significant impact (FONSI), the NEPA analysis process allows input by the air regulators that is not available through a categorical exclusion review. These analyses should minimally include estimation of emissions, mitigation measures to be used, and quantification of air quality effects. Per the EPA Interim Air Quality Policy on Wildland and Prescribed Fires, we request early notification of proposed actions so that we, as state air regulators, are better able to assess the NEPA air quality evaluations. The WRAP-FEJF will be developing criteria and basic guidelines for evaluating air quality impacts through a stakeholder-based process. We strongly support this effort and will work through that forum to ensure that state specific needs are incorporated. We request you ensure that the air quality impacts associated with prescribed fire activities are thoroughly evaluated through the NEPA process.

All feasible non-burning alternatives should be assessed and documented in the NEPA process when fire use is considered. We would like to see any guidance that your agency has developed and is currently using to evaluate alternatives to fire. The WRAP-FEJF and WGA are concurrently addressing the use of non-burning alternatives. We support these efforts and encourage your cooperation in developing these guidelines. We especially recommend that your agency evaluate the use of feasible alternatives to prescribed fire and include this analysis in its NEPA or other planning documents.

Research: Consistent with the Grand Canyon Visibility Transport Commission Recommendations made to the EPA Administrator in 1996, we urge your agency to provide additional funding for air quality planning and smoke management research that is commensurate with your proposed increases in prescribed fire. Recognizing that land management agencies have long been a source for excellent fire and smoke management research, we ask that you distribute information, analyses, or reports developed by your agency more broadly. Providing this information to air quality agencies will foster increased understanding of the strengths and weaknesses of air quality analyses and smoke management tools. Additionally, it will allow us to identify and recommend funding for those areas where additional research is needed to support smoke management decision making.

We appreciate the time and effort your agency has spent thus far addressing the air quality impacts that may result from the increased use of prescribed fire and fire managed for resource benefit. We believe taking the next steps for addressing and resolving the fundamental issues we've raised is essential. We look forward to your written response addressing these key issues.

Sincerely yours,



Ursula Kramer Trueman  
WESTAR Council President

cc:  
WESTAR Council  
Scott Archer, BLM  
Carl Gossard, BLM  
Pete Lahm, FS  
Bill Leenhouts, FWS  
Tim Sexton, NPS  
Chris Shaver, NPS  
Sandra Silva, FWS