

Wildland Fire Use Coordination and Communication Protocol July 2004

Objectives

The goal of this Wildland Fire Use Management Protocol (Protocol) is to establish the coordination framework that will be used to minimize smoke/emission impacts from naturally ignited wildland fires that are managed for resource benefits, commonly known as Wildland Fire Use fires (WFUs). Once the land management agency (LMA) decides to manage the natural ignition as a WFU it is treated as a prescribed fire by the air quality management/air pollution control districts (Air Districts). This Protocol takes into consideration the resources, requirements, and goals of the LMAs and the Air Districts. Where possible, this Protocol seeks to follow established procedures, terminology, record keeping, and timelines.

The Protocol seeks to develop emission mitigation measures before smoke/emission impacts become a concern. The Air Districts will provide information regarding air quality based trigger points that should be used to implement smoke/emission mitigation measures. LMAs and Air Districts will plan mitigation efforts well in advance of their needed use. In order to ensure that emissions can be minimized safely and cost effectively prior to the occurrence of substantial smoke/emission impacts, actions need to be planned early in the WFU management process.

The processes included in this Protocol provide an agreed upon framework for the coordination process, which can be amended by the Air Districts and the LMAs based on local and regional needs.

Definitions:

Emission Mitigation Measures are actions taken to minimize or stop the emissions associated with a WFU. These actions can be fire specific (i.e. fire redirection towards areas with lower fuel densities, holding actions, fire suppression, etc.) or non-fire specific (i.e. LMA electing to forego, or Air District not approving, other prescribed fire activity in favor of WFU activity).

Fire Emission Dispersal Advisory (FEDA)- This advisory from the Air District or the Air Resources Board (ARB) that provides fire emissions dispersal information and predicted air quality impacts.

Go/No Go Decision is the LMA initial Go/No Go decision, and subsequent revalidation of the decision, to manage a naturally ignited wildland fire for resource benefit.

- A "Go" decision means that the naturally ignited wildland fire can be managed as WFU.
- A "No Go" decision means the LMA must take appropriate actions to manage the ignition as an unwanted wildland fire. Once a fire has been

converted from a wanted to an unwanted status, it cannot be converted back.

Smoke/Emission Impacts - Smoke/emission impacts from fires include, but are not limited to: exacerbation of pre-existing health problems; effects on individual and community health, including burning eyes, runny noses, and aggravated respiratory tracts -- older adults, small children, and people with chronic heart and lung disease can be especially affected; contribution to levels of air pollution including ozone and particulate matter that exceed federal or state health-protective air quality standards, especially when air pollution levels from all sources are high; nuisances to residents and businesses; damage to property; disruption of people's lifestyles; and reduced visibility.

Smoke Management Plan (SMP) - A document for each fire over 10 acres in size prepared by land managers or fire managers that provides the information and procedures required in title 17, § 80160 and applicable Air District rules.

Air District Approval – is authorization/approval of the SMP as provided by LMA for management of a naturally ignited wildland fire for resource benefit.

Air District Disapproval – means the SMP is not approved as written and requires further mitigation and/or coordination efforts between the LMA and Air District

Trigger Points - (also called Management Action Points) *(This is the definition used for WFUs.)* Either geographical points on the ground or specific points in time where an escalation or alteration of management actions is warranted. These points are defined and the management actions to be taken are clearly described in an approved Wildland Fire Implementation Plan (WFIP). Timely implementation of the actions when the fire reaches the action point is generally critical to successful accomplishment of the objective. *(Source: federal Wildland and Prescribed Fire Management Policy)*

Wildland Fire Use - The management of naturally-ignited wildland fires to accomplish specific pre-stated resource management objectives in pre-defined geographic areas outlined in Fire Management Plans. Operational management is described in the Wildland Fire Implementation Plan (WFIP). *(Source: federal Wildland and Prescribed Fire Management Policy)*

Communication and Coordination Protocol

1) General and on-going planning and communication

- a) LMAs will seek input from the appropriate Air Districts when amending their Resource Management Plans and their Fire Management Plans.
- b) LMAs will include areas where WFUs may be used on the annual Air District Burn Registrations.
- c) Prior to each fire season, the LMAs and Air Districts will meet to discuss successes and shortfalls identified during the previous burn year and determine improvements that can be made to this Protocol.
- d) LMAs and Air Districts will work together to establish:
 - Criteria for managing WFUs in progress based on existing and projected air quality conditions

- Fire and emission reporting criteria and timelines
- Smoke mitigation measures to minimize smoke/emission impacts from active WFUs
- Coordinated outreach opportunities and methods
- Other needed resources and tools

2) Confirmation of Ignition

Summary of Section:

This section represents fire discovery, initial assessment, and location information.

Notifications and Coordination Efforts:

LMAs will communicate to ensure that natural ignitions to be managed as WFUs are selected appropriately, while considering the need to minimize air quality impacts. This is a cooperative, cumulative effort between all LMAs in the region.

- LMAs to evaluate the natural ignitions within their jurisdiction for potential use as WFU.
- LMAs to coordinate WFU selection with all other regional LMAs to achieve regional land management goals while minimizing smoke/emission impacts.
- For all naturally ignited fires, the LMA will notify the appropriate Air District, within 24 hours of ignition confirmation. This notification will include the total number of confirmed ignitions, and, for fires to be managed as WFUs, the fire location and approximate size.

3) Management Coordination Activities:

Fires \leq 10 Acres

Summary of Section:

This section represents the management activities for fires that are not expected to exceed 10 acres in size.

Notifications and Coordination Efforts:

Everything in Section 2) "Notifications and Coordination Efforts" and:

- Upon receipt of the Ignition Discovery Form and coordination with neighboring Air Districts, the Air District, or ARB, will provide a FEDA based on current and projected air quality conditions.
- The LMA will request, and the Air District or the ARB will provide, air quality forecasts to assist the LMA in their decision making process.
- The responsible Air District will coordinate with other Air Districts on a daily/weekly basis, or on an otherwise agreed upon timeline, to discuss regional WFU effects.

Available Reporting and Record Keeping Tools:

- Wildland Fire Emission Spreadsheet
- WFU Fire Emission Dispersal Advisory (FEDA)
- Wildland Fire Use Smoke Management Summary Form

- WFIP Stage Analysis and Periodic Fire Assessment documentation
The first 3 tools are available electronically at
<http://www.arb.ca.gov/smp/wfu/wfu.htm>.

Smoke/Emission Mitigation Efforts:

- An unfavorable Fire Emissions Dispersal Advisory should encourage the LMA to take appropriate management action to eliminate or minimize smoke/emission impacts
- When planning for potential WFU growth, LMA will include considerations for future projected smoke/emission impacts

**4) Management Coordination Activities:
Fires > 10 Acres**

Summary of Section:

This section represents the management activities for fires that have exceeded 10 acres in size.

Notifications and Coordination Efforts:

Everything in Section 3) "Notifications and Coordination Efforts" and:

- LMA will submit an SMP to the Air District for approval, within 72 hours of when the fire has exceeded 10 acres in size.
- LMA to notify the Air District of the growth of the WFU beyond 100 acres or 250 acres within 24 hours.
- As a component of the LMA periodic fire assessment/revalidation effort, the LMA and the Air District will revalidate the SMP. This revalidation will occur at least weekly, or on an otherwise agreed upon timeline, while the WFU is active.
- As needed, the Air District will notify States of Nevada and/or Oregon that a WFU is in progress. This notification will include anticipated smoke/emission impacts on Nevada. The LMAs will also contact the State of Nevada as needed.

Contact:

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Dept. of Environmental Quality
Bureau of Air Quality Planning
State of Nevada
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Dept. of Forestry
Fire Protection Division
State of Oregon
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- The Air District and the LMA will participate daily in 1:00 p.m. conference call, unless both agree that another format is acceptable.
Dial-in: 1-877-874-5440 Pass code: 357238
- The Air District, or the ARB, will provide air quality forecasts to assist the LMA in their on-going decision making process. The Air District will notify the LMA, with as much advanced warning as possible, when forecasted air

quality is deteriorating. The goal of these forecasts is to provide timely notification to the LMA so that they can begin emission mitigation measure implementation prior to receiving SMP disapproval from the Air District.

Available Reporting and Record Keeping Tools:

Everything in Section 3) "Available Reporting and Record Keeping Tools" and:

- Smoke Management Plan

Smoke/Emission Mitigation Efforts:

Everything identified in 3) "Smoke/Emission Efforts" and:

- An Air District approved SMP is required for all WFUs greater than 10 acres in size. Through the SMP, the Air Districts will provide input into trigger points after which emission mitigation measures should be taken. These trigger points will be based on current and forecasted air quality, Air Quality Index assessment, documented complaints, and smoke/emission impacts.
- LMA to describe what action can/will be taken to minimize or prevent smoke/emission impacts prior to their occurrence. (Examples: Preparation to redirect into an area with less fuel loading, check lines could be constructed to isolate pockets with high concentrations of accumulated fuels, etc.)
- LMA to describe what actions will be taken when smoke/emission impacts occur. (Example: Active fire redirection to previously identified areas, active fire suppression, etc.)
- LMA to implement emission mitigation measures when trigger points identified in the SMP are reached

Enhanced Communication

All effort should be made to resolve issues at the staff level. However, issues may arise that cannot be resolved by staff. When such an issue arises, LMA and Air District staff will bring it to their respective management, who will help identify a solution. ARB and U.S. EPA are available to participate in this discussion at the request of the LMA or the Air District.

5) Post WFU Reporting and Record Keeping

Land Managers will prepare a post fire season WFU summary. This summary will include the number of blackened acres per fire, the start and end dates of each WFU, the number of complaints received by the LMA, and the total emissions from each WFU. The LMA will submit this summary to the Air District and ARB.

6) Public Outreach Efforts

LMAs and Air Districts will coordinate efforts to develop a consistent public message regarding WFUs. This message should be included in the WFU related public information that the LMAs and the Air Districts produce. LMAs and Air Districts will work together to identify communities, groups, and organizations that should receive special outreach attention.