

## MEMORANDUM

SUBJECT: Interim Air Quality Policy on Wildland and Prescribed Fires

FROM: Richard Wilson, Acting Assistant Administrator  
for Air and Radiation (6101)

TO: Regional Administrators, Regions I - X

Attached is the Environmental Protection Agency's (EPA's) interim policy for addressing public health and welfare impacts caused by wildland and prescribed fires that are managed to achieve resource benefits.<sup>1</sup> Ambient air quality worse than the national ambient air quality standards (NAAQS) for PM<sub>2.5</sub> and PM<sub>10</sub> is used as the principal indicator of public health impacts. Visibility impairment is used as the principal indicator of public welfare impacts. This policy complements the Natural Events Policy which was issued May 30, 1996, to address public health impacts caused by wildfires (which are unwanted wildland fires). This is an interim policy for two reasons. First, the Agency is expecting recommendations on how to treat air quality impacts from agricultural burning from the U.S. Department of Agriculture's Air Quality Task Force. Second, until the final rules for implementing EPA's Regional Haze Program are promulgated, it is not possible to formulate final policy with respect to the impact of wildland and prescribed fires on regional haze.

This policy was prepared with the help of a work group of stakeholders including the Federal land management agencies in the Departments of the Interior and Agriculture; State land management agencies, State and local air quality managers; the Intertribal Timber Council; and the Sierra Club. The policy was also reviewed by the Federal Advisory Committee Act Subcommittee for Ozone/PM/Regional Haze Implementation, and by the owners/managers of privately owned wildlands. All of the recommendations and concerns raised by the stakeholders during the process were addressed to the extent possible. A glossary of the land, fire and air quality management terms used throughout the document is included at the end.

Fires have always occurred naturally (usually caused by lightning) in the wildlands (areas with little development) when the conditions were right (fuels such as grass, leaves, shrubs and branches were available and dry). The effects of those fires on society and society's management of fires have changed over time. The management response for decades has been to suppress such fires because of the threat they posed to life and property where the wildlands and urban communities interface, and the threat to natural resources in the wildlands. However, it has become apparent that excluding fire from the wildlands has caused unintended negative effects on wildland ecosystems. Therefore, the Federal land management agencies thoroughly reviewed

---

<sup>1</sup>This memorandum and the attached document contain EPA policy and therefore, do not establish or affect legal rights or obligations. They do not establish a binding norm and are not finally determinative of the issues addressed. In applying this policy in any particular case, the EPA will consider its applicability to the specific facts of that case, the underlying validity of the interpretations set forth in these documents, and any other relevant considerations, including any that may be required under applicable law and regulations.

their fire management policies in 1995. The results of the review are presented in a final report issued December 18, 1995, titled the Federal Wildland Fire Management Policy and Program Review. Administrator Browner endorsed the principles, policies and recommendations of the review in February 1996. As a result of the review most Federal and some State, Indian and private wildland owners and managers plan to allow fire to play a more natural role in managing their wildland ecosystems. Consequently, the acres of wildlands burned annually increased in 1996 and 1997, and will continue to increase significantly for several years.

In the Interim Air Quality Policy on Wildland and Prescribed Fires, EPA urges State and tribal air quality managers to collaborate with wildland owners and managers to mitigate the air quality impacts that could be caused by the increase of fires managed to achieve resource benefits. EPA especially urges them to develop and implement at least basic smoke management programs (SMP's) when conditions indicate that such fires will adversely impact the public. SMP's establish procedures and requirements for minimizing emissions and managing smoke dispersion. The goals of SMP's are to mitigate the nuisance and public safety hazards (e.g., on roadways and at airports) posed by smoke intrusions into populated areas; to prevent deterioration of air quality and NAAQS violations; and to address visibility impacts in mandatory Class I Federal areas.

In exchange for States and tribes pro-actively implementing SMP's, EPA intends to exercise its discretion not to redesignate an area as nonattainment if the evidence is convincing that fires managed for resource benefits caused or significantly contributed to violations of the daily or annual PM<sub>2.5</sub> or PM<sub>10</sub> standards. Rather, EPA will call on the State or tribe to review the adequacy of the SMP in collaboration with wildland owners/managers and make appropriate improvements to mitigate future air quality impacts.

The policy also addresses the treatment of fire emissions to meet other Clean Air Act requirements, such as prevention of significant deterioration and conformity of Federal activities with State implementation plans. If you have any questions during implementation of this policy, please contact Sally Shaver, Director of the Air Quality Strategies and Standards Division of the Office of Air Quality Planning and Standards. The staff contacts are Ken Woodard at 919/541-5697 and Gary Blais at 919/541-3223.

#### Attachment

cc: Air Division Director, Regions I-X  
Air Programs Manager, Regions I-X  
John Seitz  
Lydia Wegman  
Rich Ossias  
Sally Shaver  
Tom Curran