



Washington Prescribed Fire Council

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Re: Washington Department of Natural Resources' Smoke Management Plan

The Washington State Prescribed Fire Council appreciates this opportunity to comment on the proposed Smoke Management Plan update (“2022 SMP”).

Introduction

The Washington State Prescribed Fire Council represents members from over 50 organizations including state and federal agencies, tribes, non-governmental organizations, the private sector, universities, and more. Our membership is diverse. However, our members are united by our mission to protect, conserve, and expand the safe and responsible use of prescribed fire on the Washington landscape to meet both public and private management objectives. Prescribed fire refers to the planned, professional application of fire to reduce stockpiled fuels. Reducing these fuels with prescribed fire is critical to prevent the catastrophic wildfires that threaten lives, property, natural resources, and air quality.¹

I. The 2022 Smoke Management Plan is a Major Step Forward

The Prescribed Fire Council applauds the Department of Natural Resources (DNR), and the Department of Ecology (Ecology) for developing this update to the SMP. By facilitating the careful use of prescribed fire, the 2022 SMP will reduce the risk of catastrophic wildfire while

¹ See e.g., Scott Stephens et. al., *The Effects of Forest Fuel-Reduction Treatments in the United States*, BioScience Vol. 62 No. 6 (Jun. 2012) [https://www.fs.fed.us/psw/publications/fettig/psw_2012_fettig001\(stephens\).pdf](https://www.fs.fed.us/psw/publications/fettig/psw_2012_fettig001(stephens).pdf) (finding that prescribed fires are “successful in meeting short-term fuel-reduction objectives such that treated stands are more resilient to high-intensity wildfire”).

protecting Washington's air quality.² We particularly want to highlight four areas where the 2022 SMP makes significant progress over the current SMP.

First, we support that the 2022 SMP removes the prohibition on summer weekend burning. With thoughtful planning and attention to weather conditions, prescribed fires can be completed without significant impacts on views, air quality, or weekend recreation activities. Moreover, prescribed burning is already limited to a small number of days per year when weather conditions, seasons, and available resources align. The weekend prohibition arbitrarily reduces the number of days even further. We appreciate that under the 2022 SMP, burn permit decisions will be based on safety and air quality, not the day of the week.

Second, the 2022 SMP includes a commitment by DNR to notify large burn permit applicants if their burn has been approved by 4:30 PM the day before. We commend DNR for proposing this change. This is critical for the Prescribed Fire Council's members to have time to organize the staff and safety equipment necessary to execute a prescribed fire.

Third, we also appreciate the additional clarity regarding the approval process for multi-day burns. However, we are interested in working with the state agencies during implementation to ensure that if three months of notice is required for a multi-day burn application, applicants may amend the application as new information becomes available.

Fourth, we support the process for approving burns within Urban Growth Areas (UGAs). We expect that prescribed fires within UGAs will be limited. However, prescribed fire in these areas may be critical to protecting communities from a catastrophic wildfire.

II. Include Stakeholders in Implementing the Smoke Management Plan

While the 2022 SMP clarifies many elements of the burn approval process, the Prescribed Fire Council expects that our members will identify potential improvements and new issues during implementation. Furthermore, because the SMP is incorporated into Washington's Clean Air Act State Implementation Plan (SIP), formal revisions to the SMP require federal approval. Our experience is that this is a multi-year process. Therefore, the 2022 SMP must incorporate stakeholder feedback during implementation to ensure it is maximally effective because it may be several years before another revision is possible.

While we appreciate the 2022 SMP contemplates an After Action Review (AAR), the description of this element would benefit from additional clarity. The 2022 SMP does not require DNR to

² See Environmental Protection Agency, *Comparative Assessment of the Impacts of Prescribed Fire Versus Wildfire (CAIF): A Case Study in the Western United States* (Sept. 30, 2021) (finding that "prescribed fire can reduce the overall size of a future wildfire" and that "prescribed fire is not without risk as it can result in smoke related air quality and public health impacts, but at a much smaller scale compared to a wildfire").

conduct the review, but only provides that DNR “may” do so. *See* Wash. Dept. of Natural Resources, *Smoke Management Plan* (May 10, 2022) at 6. Moreover, the 2022 SMP is similarly vague regarding who is included and what the AAR will produce.

Instead of occurring at DNR’s discretion, we suggest the AAR be adopted as an annual requirement. Additionally, the AAR should explicitly include prescribed fire practitioners so that DNR may collect the input of those directly impacted by the burn approval process. Finally, the AAR should begin to identify issues to address in the next SMP revision. We propose the 2022 SMP, page 6, be revised with our suggested changes in *italics*:

“Once each year DNR *must* convene state, federal, private burners, *prescribed fire practitioners*, partner agencies including Ecology and LCAAs, and relevant DNR staff for a full-day after-action review (AAR). *During the AAR, DNR and the participants shall identify and record issues that may require an update to the SMP.*”

Alternatively, we would support the creation of a separate advisory committee. In Appendix 9, the 2022 SMP suggests that “members of the Smoke Management Advisory Committee” may meet to evaluate DNR’s guidelines for the Eastern Washington forest burning emissions exemption. *See* Wash. Dept. of Natural Resources, *Smoke Management Plan* (May 10, 2022) at 80. However, the committee is not referenced elsewhere in the 2022 SMP. We are aware that Oregon’s Smoke Management Plan includes an advisory committee that meets annually. *See* OAR 629-048-0450(4). A similar committee, that includes prescribed fire practitioners, could also support the implementation process in Washington. We welcome the addition of an advisory committee if that is preferable to a robust AAR.

III. Distinguish Complaints from Inquiries

We also support the provisions in the 2022 SMP pertaining to complaint tracking. However, we want to ensure that mere inquiries are not miscategorized as complaints. For example, if a caller sees smoke and is concerned that a wildfire may be nearby, and only wishes to clarify whether the smoke is from a prescribed fire or a wildfire, this call should not be categorized as a complaint. This may be achieved by requiring each caller to first indicate whether they are seeking information or registering a complaint. Furthermore, we encourage DNR to collect caller information so that complaints can be followed-up on and a dialogue established with concerned parties.

IV. Support Eastern Washington Landowners Applying Under RCW 70A.15.5130(4)

The 2022 SMP would also benefit from reducing the burden on landowners who wish to request the exemption from emission limits for Eastern Washington forest health prescribed burning as

authorized by RCW 70A.15.5130(4). DNR should ensure that burn permit applications, and the burn portal webpage, provide clear instructions and a helpline for those requesting the exemption.

Conclusion

We applaud DNR and Ecology for developing the 2022 SMP. We look forward to collaborating with both agencies during the implementation process. We support Ecology's proposal to amend the SIP to include the 2022 SMP and hope the process moves forward swiftly.