SEPA Nonproject Review Form

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. The Nonproject Review Form (NPRF) is an optional tool to help the lead agency evaluate the environmental consequences of a nonproject proposal and to provide information to decision-makers and the public.

The NPRF cannot be used as a substitute for the environmental checklist, but may be attached as supplemental analysis. Applicable information in the NPRF can be referenced in the environmental checklist without having to repeat the information.

The NPRF is intended to be used concurrently with the development of a nonproject proposal. To achieve maximum effectiveness and efficiency the initial use of the form should begin at the time a nonproject proposal is being contemplated, i.e. upon identification that a plan, policy or rule is likely to be needed or is mandated.

The information and analysis in the NPRF should be updated as the proposal is developed. The number of revisions will depend on the complexity of the proposal. If the proposal is minor, one iteration of the NPRF may be sufficient. For more complex proposals, the NPRF should be revised as analysis is completed or key issues resolved.

If you are unfamiliar with the form, you should review all of the questions before providing any answers. This will help familiarize you with the questions and should avoid duplication of information. Please note that when a nonproject proposal is first contemplated, it is often premature to respond to some questions in the NPRF. Answers may also change as the proposal is developed and analysis is completed.
1) Background

a) Name of proposal, if any, and brief description.
   Smoke Management Plan Update
   The proposal is an update of the State’s Silvicultural Smoke Management Plan, which is the tool that we use to manage the smoke from pile-burning for timber site preparation and broadcast burning to promote forest health and reduce fuels.

b) Agency and contact name, address, telephone, fax, email
   Jonathan Guzzo
   Department of Natural Resources, Wildfire Division
   1111 Washington St SE
   Olympia, WA 98504
   Phone: 360.292.5921
   jonathan.guzzo@dnr.wa.gov

c) Designated responsible official
   Chuck Turley, Wildfire Division Manager

d) Describe the planning process schedule/timeline
   October 2016 - June 2017  Public Outreach, identification of issues, development of options
   July 2017 – October 2017  Initial draft development
   October 2017 – July 2018  Public outreach and internal/external comment on draft plan
   July 2017 – October 2018  Develop final draft, prepare for state and federal public process
   December 2019 – Ongoing  Determine scope of analysis for EPA approval, revise WACs as necessary, conduct analysis, submit for federal approval

e) Location - Describe the jurisdiction or area where the proposal is applicable.
   The Smoke Management Plan applies to areas under DNR’s Fire Protection and all federal forested lands statewide.
f) What is the legal authority for the proposal?
The legal authority is contained in
RCW 70.94 Series-State Clean Air Act
RCW 76.04 Series-State Forest Protection Laws
WAC 332-24 DNR Burn Permit Procedures

g) Identify any other future nonproject actions believed necessary to achieve the objectives of this action.
N/A

2) Need and Objectives

a) Describe the need for the action. (Whenever possible this should identify the broad or fundamental problem or opportunity that is to be addressed, rather than a legislative or other directive.)

The Smoke Management Plan regulates smoke from silvicultural burning that may impact public health and property or contribute to impaired visibility in Class I Federal Areas. While the plan has not been updated since 1998, the underlying structure and processes still work to protect public health and allow a limited program of outdoor burning. Over the years, state and federal land managers and some segments of the timber industry have expressed concerns with the constraints placed upon them by the Plan, and as a result, the state legislature directed DNR to update the Plan, and funded a two-year timeline.

The need for action is a directive from the state legislature, but that directive proceeds from a sincere interest in increasing the pace and scale of forest restoration in eastern Washington, the need to strategically target unsafe fuel loads in dry side forests, and the business need for industry to prepare timberlands for harvest. The opportunity we have is to learn from the past and build on new technology, strengthened relationships, and more robust organizational structure to allow for more latitude in approving silvicultural burning while not impairing public health.

b) Describe the objective(s) of the proposal, including any secondary objectives which may be used to shape or choose among alternatives.

The objective of the proposal is to develop a Smoke Management Plan that:

- Is at least as protective of human health, air quality, and quality of life as the previous plan,
- Conforms to all necessary State and Federal statute and existing WACs,
- Provides new avenues for applying fire to Washington’s forested landscapes,
- Increases public understanding of silvicultural burning, its purposes, and its impacts.
- Fosters coordination and communication between silvicultural burning stakeholders, such as regulators, burners, and affected communities.
c) Identify any assumptions or constraints, including legal mandates, which limit the approach or strategy to be taken in pursuing the objective(s).

The key constraints are the state and federal Clean Air Acts, as well as associated federal guidelines for adoption of Smoke Management Plans into overall regulatory frameworks, such as State Implementation Plans for clean air and regional haze.

The Federal Clean Air Act imposes the following limits:

- Silvicultural burning must not significantly contribute to an exceedance of National Ambient Air Quality Standards (NAAQS), currently set at 35 µg/m³ of PM 2.5 (Particulate matter 2.5 microns in diameter or smaller), averaged over a 24 hour period.
- Silvicultural burning must not impair visibility in a Class I Federal Airshed, which are a subset of National Parks and designated Wilderness established with passage of the Clean Air Act.
- Silvicultural Burning should not cause intrusions of smoke into populated areas. If it does, actions should be taken to reduce the severity and duration of the intrusion, and to support the well-being of people who are affected by smoke in the ambient air, including children, the elderly, and those with compromised cardiovascular function.

The State Clean Air Act imposes mandatory emissions reductions that proceed from federal law. These reductions were made in 1994 and 2000, and form the ceiling for our annual reported emissions from silvicultural burning of all kinds. Further, all emissions for burns that are ignited with the intent of improving forest health are exempt from mandatory emissions reductions—e.g., they will not be included in the annual tally of emissions from silvicultural burning.

Requestors must submit a formal request for exemption that includes:

1. **Legal description of the proposed burn.**

2. **A description of the health situation, forest health objectives and treatments schedule.**

3. **A brief description of the alternatives to silvicultural burning that could achieve the desired objective.**

4. **Reasons why the landowner does not believe alternatives to burning are appropriate in this situation.**

Exemption requests cannot be made after burning has been completed. To the best of our knowledge, using the most current reporting and the best available emissions tracking tools, we are well below our annual emissions threshold, so this does not impose a real limit on us.
We have not rigorously tracked our emissions from forest health projects, nor have we made a point of requesting exemption paperwork from burners. We may adopt a policy of strongly suggesting that these materials be provided as part of building out the set of procedures we use to implement the updated Smoke Management Plan.

d) If there is no legislative or other mandate that requires a particular approach, describe what approaches could reasonably achieve the objective(s).

3) Environmental Overview

Describe in broad terms how achieving the objective(s) would direct or encourage physical changes to the environment. Include the type and degree of likely changes such as the likely changes in development and/or infrastructure, or changes to how an area will be managed.

There are three primary changes to the environment that would result from changes to the Smoke Management Plan that we envision:

1. Increase in the acres of forest treated using fire: Should we make it easier to apply fire to the forested landscape, there will be an increase over time in the acreage of forestland treated for fuel loading, insects and/or pathogens, and species habitat restoration.
2. Increase in the amount of smoke from silvicultural burning in Washington’s airsheds, with commensurate potential increases in particulate matter delivery.
3. Increase in the amount of land clearing for timber and timber harvest purposes.

4) Regulatory Framework

a) Describe the existing regulatory/planning framework as it may influence or direct the proposal.

The current Smoke Management Plan, as described earlier, regulates smoke from silvicultural burning by giving or withholding permission to burners on the day of ignition, delegates roles and responsibilities to all parties either generating smoke or regulating it, and sets policies for approving multiple day burns, low risk area designations, plan exceptions, and emissions assessments. The current Smoke Management Plan is considered to be less permissive than our neighboring states’ plans and approaches, since DNR approves each burn using a spot forecast and extends or withholds approval on the day of ignition, rather than the day before or earlier. Further, DNR manages smoke to avoid intrusions entirely, which is a very stringent standard, given that an intrusion is defined roughly as the presence of smoke, which is a very high bar to hit. Finally, the Smoke Management Plan prohibits weekend burning between June 15 and October 1, which makes burning difficult because burn units are often at their best state of readiness for ignition, both from a burn prescription and an emissions perspective.

The current Smoke Management Plan will act as a foundation for our update, but it will likely diverge in the areas of decision timing, summer weekend burning prohibitions, and burn approval criteria, specifically the criterion that regulates smoke to prevent intrusions rather than exceedances of state air quality standards. The primary roadblock to making these
changes is that the Smoke Management Plan was adopted into the State Implementation Plan (SIP) of the Clean Air Act, which means that any changes will have to pass muster with federal regulatory partners, namely the Environmental Protection Agency (EPA).

Finally the state’s newly-adopted 20 Year Forest Health Strategic Plan calls for significant forest restoration in dry side, fire adapted forests. We are unlikely to be able to meet the Department’s goals without significantly increasing the pace and scale of restoration including an increase in silvicultural burning.

b) Identify any potential impacts from the proposal that have been previously designated as acceptable under the Growth Management Act (GMA), chapter 36.70A RCW.

The Smoke Management Plan is not regulated under the Growth Management Act.

5) Related Documentation

a) Briefly describe any existing regulation, policy or plan that is expected to be replaced or amended as a result of the proposal. (Adequate descriptions in section 4.a may be referenced here, rather than repeated.)

Please see description of current Smoke Management Plan, which will be replaced by the plan update, in section 4(a).

b) List any environmental documents (SEPA or NEPA) that have been prepared for items listed in 4.a. or that provide analysis relevant to this proposal. Note: Impacts with previous adequate analysis need not be re-analyzed, but should be adopted or incorporated by reference into the NPRF. Identify the:

SEPA was conducted on the original adoption of the 1998 Smoke Management Plan, and included an environmental checklist resulting in a determination of nonsignificance (DNS). The Smoke Management Plan, as noted above, is incorporated into the Region Haze SIP, Adopted by the Washington State Department of Ecology on 12/22/10, and updated on 6/11/15. This document can be reviewed at https://fortress.wa.gov/ecy/publications/SummaryPages/1002041.html Type of document

c) List other relevant environmental documents/studies/models which have been identified as necessary to support decision making for this proposal.

We use and will continue to use a number of models to support our decision making, including:

CONSUME—an emissions modeling module developed by the Forest Service

AirFire Tools—a suite of atmospheric modeling and monitoring tools that help predict the extent and direction of smoke plumes resulting from silvicultural burning.
6) Public Involvement (Optional)

a) Identify agencies with jurisdiction or expertise, affected tribes, and other known stakeholder groups whose input is likely to be specifically solicited in the development of this proposal.
Washington State Department of Ecology
Washington State Department of Health
County Health Departments
Regional and local Clean Air Agencies
United States Forest Service
Washington Department of Fish and Wildlife
National Park Service
Industrial timber operations (represented by Washington Forest Protection Association)
Small Forest Landowners (represented by Washington Farm Forestry Association)
Conservation organizations interested in forest restoration
  Local, regional, and national non-profits
  Washington Prescribed Fire Council
  Forest Health Collaboratives

b) Briefly describe the processes used or expected to be used for soliciting input from those listed. [Examples: ad hoc committees, tribal consultations, interagency meetings, public workshops or hearings, newsletters, etc.]
The currently-operating Smoke Management Plan Update Task Force, which includes:
  Julie Oliver, Spokane Clean Air Agency
  Eric Schallon, Green Diamond Resource, LLC
  Tonya Neider, National Park Service
  Janice Peterson, United States Forest Service
  David Grant, Washington State Department of Ecology
  Julie Fox, Washington State Department of Health
  Jesse Boyd, Leavenworth Chamber of Commerce

Focus Groups at each of DNR’s Regions and with
  Washington State Department of Ecology and EPA
  Federal and State burners
  Private Timber Industry representatives
  Public Health Officials
  Local and Regional Clean Air Agencies
7) Affected Environment

Generally describe the existing environmental landscapes or elements (e.g., character and quality of ecosystem, existing trends, infrastructure, service levels, etc.) likely to be affected if the proposal is implemented. Include a description of the existing built and natural environment where future “on the ground” activities would occur that would be influenced by the nonproject proposal.

Since the Smoke Management Program is not site-specific, it is difficult to describe, even in general terms, the existing natural landscapes likely to be affected, but in broad terms, they include:

Central and Eastern Washington fire-adapted forestlands, including ponderosa pine savannah, mixed-conifer forests, and adjacent grasslands. Most of these forestlands are in departure from historic fire regimes, meaning that they are often the site of insect infestations, are impacted by pathogens and parasites, and subject to severe overstocking. They often display conditions that put them in danger of catastrophic wildfire, such as high levels of tree mortality, crowding, and multiple canopies. Drought and climate change combine with these conditions to speed up an already frequent fire return interval. Despite being primarily rural in character, Central and Eastern Washington are home to communities as diverse in culture and economy as Omak, Winthrop, Chelan, Wenatchee, Leavenworth, Ellensburg, Cle Elum, Yakima, Richland, Walla Walla, Spokane, Colville, and Republic. Generally speaking, prescribed burning occurs in Eastern Washington, since reducing fuels, eliminating insects and pathogens, and altering stand structure and composition are key elements of forest health restoration.

Western Washington forestlands are predominantly Douglas fir, western red cedar, sitka spruce, and hemlock dominated. Western Washington is much wetter than Central or Eastern, which has tended to obviate forest health concerns, since a tree with a weakened root system due to laminated root disease can still thrive in an abundantly wet system. Since Western Washington is among the most productive forestland in the world, timber operations tend to be centered there. The primary use of fire on Western Washington forestlands is post-harvest burning of piled slash to clear land for replanting. Generally speaking, piles are easier to manage from a smoke perspective. Since they tend to burn hot and produce less smoke smoldering is generally reduced, and it is much easier to refrain from igniting new piles in order to lessen smoke impacts when detected. Finally, Western Washington’s weather is generally more favorable, with prevailing winds often
transporting smoke away from communities and out to sea.

**Note:** When complete, this section needs to provide information on existing conditions for the elements of the environment discussed in sections 8 and 9. A list of both the built and the natural elements of the environment is found in WAC 197-11-444, and included at the end of this form.

8) **Key Issue Assessment**

List the identified key issues or areas of controversy or concern and include a brief statement of why each is a key issue. For each item listed:

**Timing of Smoke Management Decision**
Per the current Smoke Management Plan, DNR informs burners that they have received permission or been denied permission to burn on the morning of ignition. This is an area of controversy/concern because it pits the need of burners to have time to deploy staff and resources on site to ignite the burn in a timely fashion against the needs of smoke-impacted communities and laws protecting visibility in Class I Federal Airsheds.

a) Alternatives: Approve or deny burns 24 hours in advance. Approve or deny burns by 4:00 PM the day before ignition.

b) Environmental Impacts:

24 hour advance notice: At 24 hours out from the morning of ignition, we would be working with forecast models that ran at midnight the evening before. That means that the forecasting tools we would apply for a spot forecast would be 32 hours old. At that remove in time from the moment of ignition, forecasts can degrade enough that the risk of smoke impacts to communities could rise to potentially unacceptable levels. Further, the risk that a burner will ignite under an air quality curtailment increases, as does the danger of smoke from silvicultural burning mixing with agricultural or other smoke and leading to an exceedance of state or national air quality standards.

4:00 PM day prior to ignition: Making decisions at this moment means that we are working with models that last ran at noon. That means that going into ignition, our forecast is 20 hours old, at which point it is more reliable, but not as robust as a spot weather forecast procured on the day of ignition. There may be slightly elevated potential for impacts to communities, and forecasts do not always hold overnight. When offering approval the day before ignition, we will reserve the right to rescind permission to ignite on the morning of ignition. We expect that we will have to resort to that very rarely. We will need to develop an operating procedure to ensure that each decision made the day before is reviewed on the morning of ignition.

c) Describe reasonable mitigation of adverse impacts identified.

For both options, the ability to deny approval once it’s given—e.g. on the morning of ignition, when there are indications that the forecast has degraded enough ignition will impact communities. Further, the option of saying maybe rather than just yes or no—
effectively shifting approval or denial to the morning of ignition—provides an important
safety valve should there be indication that conditions could change.

d) Identify those alternatives to be carried forward for further analysis.
   We will analyze the 4:00 PM day prior to ignition alternative.

e) Briefly describe why those alternatives rejected from further consideration were not carried
   forward.
   We rejected 24 hour approval because of the forecast uncertainty inherent in that timeline.

Changing go/no-go standard from Intrusion to Exceedance

Large Burn Approval Criterion #1 asks whether a burn is likely to cause an intrusion of smoke
into the ambient air up to 2000' above a critical area designated by the Department of Ecology.
However, the plain language of the statute speaks to an exceedance of state air quality standards
at the same elevation over the same designated communities. An intrusion of smoke is defined as
visible smoke, whereas an exceedance of state air quality standards is an exceedance of the
National Ambient Air Quality Standards (NAAQS), since Washington has not promulgated a
more stringent standard than the NAAQS. The threshold for exceeding NAAQS is 35 µ/m^3 of
PM 2.5 averaged over a 24-hour period, which is much more than visible smoke. Since the
criterion diverges from its enacting RCW (70.94.6538), DNR is considering aligning the two,
because we are concerned that our daily smoke management decision is open to challenge.

a) Identify alternative options or solutions for the objective or concern.
   The alternatives are:
   
   Extend or withhold Smoke Management Approval based on whether a burn is likely to cause
   an exceedance of state air quality standards,
   
   Or
   Whether a burn is likely to cause an intrusion of smoke.

b) Describe the environmental considerations/impacts relevant to each of the alternatives
   identified in 8.a.
   
   Exceedance standard: Using an exceedance of state air quality standards as our benchmark
   means that we will no longer make go/no-go burns against the intrusion criterion, with the
   result that intrusions will become at least slightly more likely.
   
   Intrusion standard: Using the current approach will not cause new adverse impacts.

c) Describe reasonable mitigation of adverse impacts identified.
   In the event that we choose to change the standard of Criterion #1 from intrusion to
   exceedance, we monitor for any potential ongoing air quality impacts and mitigate their
   public health consequences by using a procedure identified and approved by DNR. The
   Smoke Management Plan Update Task Force has approved a draft procedure to monitor for
   and respond to intrusions:

   **Smoke Intrusions caused by all burning**
   Particulate matter concentrations not exceeding NAAQS can still impact the public
   and should be avoided. When smoke enters a designated area or sensitive area at
unacceptable levels at ground level, it is called a smoke intrusion. Knowing when and where an intrusion is occurring is possible, using either monitoring data or visibility (in miles) indexes.

Smoke concentrations are considered unacceptable for the purposes of this plan when the 3-hour rolling concentration average exceeds the current Washington State 24-hour average concentration for protecting sensitive individuals from fine particulate matter. As of 2019 this value is 20.5 μg/m³ for PM2.5.

To foster coordination and trust between burners, regulators, and impacted parties, DNR will follow the procedure below to detect and respond to smoke intrusions:

1. On days when burns are ignited, DNR Wildfire Division staff will check monitor readings, communicate with DNR Regional staff and burners, track community webcams, and use other resources to establish the level of smoke, if any, in potentially impacted communities.

2. If weather conditions, burn conditions, monitor readings (when available), or public complaints suggest that smoke has entered a designated or sensitive area(s) at a 3-hour rolling average, using generally accepted forecasting tools, at a concentration equal to or greater than Ecology's 24-hour average goal for protecting sensitive individuals (20.5 μg/m³ of PM2.5) from fine particulate matter, DNR will contact:
   a. The burn practitioner to discuss actions to mitigate smoke quantity and transport, and to foster coordination with other burners operating in the area.
   b. The relevant DNR Region, Ecology and LCAA.

3. As the day of ignition progresses, DNR will monitor available field resources, including permanent and portable air quality monitors, distributed private monitoring networks, community cameras, and field observations by DNR staff to track the increase or decrease of smoke in impacted communities.
   a. If particulate matter levels continue to increase, DNR will alert the burn practitioner and all other burn practitioners operating in a 20 mile radius to:
      i. Take photos of their burn sites, including column and plume photos, if possible.
      ii. Record hourly wind speed and direction for their sites.
      iii. Record hourly temperature for their sites.
      iv. Record atmospheric conditions, such as cloud cover and precipitation for their sites.
   b. DNR will keep all officials mentioned in 2 (b) of this procedure apprised of developments.
   c. If DNR determines that an intrusion of smoke has occurred from a DNR approved burn, the accountable burner will write a preliminary intrusion report (see Appendix 4 of this report), and deliver it to DNR within 24 hours of the intrusion.
   d. Within 5 days of the intrusion a thorough report will be submitted to DNR (See Appendix 4).

4. DNR will respond to the intrusion report within 10 business days. DNR’s communication will include:
   a. Any dissension from the facts of the report.
b. A summary of all actions taken to mitigate the severity of the intrusion by DNR.

c. A review of future actions to be taken to decrease the likelihood of a future intrusion.

d. All procedural, operation, or policy changes arising from the intrusion.

e. DNR will share all data and the final intrusion reports resulting from this process with applicable partner regulators, including Ecology, LCAA, State and Local Health Departments, and EPA.

d) Identify those alternatives to be carried forward for further analysis.

We will further analyze using the exceedance standard in Criterion #1

e) Briefly describe why those alternatives rejected from further consideration were not carried forward.

See 8.b. Timing of Smoke Management Decision/24 hour advance notice option.

**Lifting the prohibition on weekend burning from June 15-October 1**

Our current Smoke Management Plan prohibits burning on weekends (defined as Friday-Sunday) from June 15 through October 1, in the service of preventing impacts to regional haze and preserving recreational opportunities during prime summer recreation months. The weekend burning prohibition was developed and implemented as part of the 1998 Smoke Management Plan development process.

There are strong arguments to be made for allowing more burning in the summer. With better smoke transport and drier fuels come cleaner burns. If burners implemented some of the burns that they would ignite in the summer months instead of in October or later in the fall, there is some likelihood that we would see fewer resulting smoke impacts. In any event, DNR is implementing a review of key historical smoke transport factors—e.g., ventilation index—on weekends during the summer prohibition window, going back 10 years to assess whether or not the experience and wisdom of burners and regulators is corroborated by data.

a) Identify alternative options or solutions for the objective or concern.

There are three alternatives:

1. Eliminate the prohibition on weekend burning.
2. Leave the prohibition in place

b) Describe the environmental considerations/impacts relevant to each of the alternatives identified in 8.a.

Alternative 1: Using Summer 2019 as an example, lifting the weekend burn prohibition would result in 45 more potential ignition days, which means that more burns could be ignited than would normally be the case. Our experience and that of burners suggests that ventilation of smoke is better in late summer than it is in October, and that fuels are drier in the summer months. Drier fuels lead to cleaner ignitions, so, in combination with the daily smoke management decision, we would expect to see fewer smoke impacts than if burns were ignited in October or later in the fall. Finally, there is a strong possibility that burners would choose not to ignite, since their own rules on burning during high fire precaution levels would prohibit them from igniting. We do not expect to see transient smoke impacts
increase, since our daily smoke management go/no-go decision is calibrated to avoid cumulative effects from lingering smoke.

Alternative 2: Leaving the weekend burning restriction in place for its full extend would result in fewer burn days, so ostensibly fewer smoke impacts. But burning later in the year means burning fuels that are not as dry as earlier in the year and combust less completely. Incomplete combustion results in more emissions.

In our estimation, lifting the weekend burn prohibition is at worst a wash in terms of emissions, and at best, results in fewer impacts to communities due to better overall ventilation and more complete combustion of dry fuels.

c) Describe reasonable mitigation of adverse impacts identified.

Under the proposed new Smoke Management Plan, all burns conducted on summer weekends would be subject to the same smoke management approval process as all others, which takes into account the potential public health and visibility impacts of burning, regardless of season. This prevents rather than mitigates. Should smoke impacts in populated areas rise to the level of an intrusion, we would implement our intrusion policy outlined in the previous discussion of the intrusion vs. the exceedance standard.

d) Identify those alternatives to be carried forward for further analysis.

We have opted to carry forward both alternatives 1 and 2 for further analysis.

e) Briefly describe why those alternatives rejected from further consideration were not carried forward.

N/A

9) Proposed Nonproject Action or Alternative Actions

Describe a range of reasonable alternatives or the preferred alternative that will meet the objective(s). For each alternative, answer the following questions referring again to the list of the elements of the environment in WAC 197-11-444:

Preferred Alternative

The preferred alternative is our current Smoke Management framework with some the following changes:

1. Change the standard in our first go/no-go criterion to an exceedance of State air quality standards rather than an intrusion of smoke.
2. Provide burners with a Smoke Management decision by close of business the day before ignition vs. the morning of ignition.
3. Lift the prohibition on weekend burning.
4. Require more air quality monitoring, assessment of ignition progress, and coordination of burners seeking to ignite multiple day burns.
5. Develop a more transparent, efficient, and timely exceptions process.
6. Institute a process for adjusting the provisions of the Smoke Management Plan in response to changing conditions and new information.
a) Changes/Effects/Increased Demand

The key change/impact of the preferred alternative will be on air quality. The combined effects of using exceedance rather than intrusion as our criteria standard, making smoke management decisions earlier than we do now, and partially lifting the weekend burn prohibition will be to allow more burns to be ignited, which could increase impacts in specific areas.

b) Potential Mitigation Measures

1. Smoke Management Decision: Making a site-based smoke management decision, combined with the option to rescind approval should conditions change overnight, will mitigate most impacts.

2. The above-cited intrusions procedure will further help mitigate impacts to public health in the event that an intrusion of smoke into populated area occurs.

c) Identify unavoidable impacts and those that will be left to be addressed at the project level. There are no unavoidable impacts of the Smoke Management Plan that are not accounted for by the site-based Smoke Management Decision.

d) Describe how the proposal objectives will or will not be met if the impacts described in 9.c were to occur. N/A

Note: Alternatives may be rejected at any point in the process if: they have no environmental benefit, are not within existing authority, are determined unfeasible, or do not meet the core objectives.

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PART III – IMPLEMENTATION CONSIDERATIONS

10) Consistency of the proposal with other plans, policies and laws.

a) Internal consistency - If there are internal inconsistencies between this proposal and your agency's previously adopted or ongoing plans and regulations, identify any strategies or ideas for resolving these inconsistencies.

The Smoke Management Plan Update is internally consistent with the Twenty Year Forest Health Strategic Plan recently adopted by DNR. The plan calls for treatment of 1.4 million acres of forest over the next twenty years. Forest health treatments using prescribed fire are not the only way to implement those treatments, but they are likely a necessary element of achieving that goal.

b) External consistency - If there are external inconsistencies between this proposal and adopted or ongoing plans and regulations of adjacent jurisdictions and/or other agencies, identify any strategies or ideas for resolving these inconsistencies.
There are no external inconsistencies, since the approaches we have outlined are consistent with the goals of the State Implementation Plan of the Clean Air Act and the Regional Haze Rule.

11) Monitoring and Follow-up

a) Describe any monitoring that will occur to ensure the impacts were as predicted and that mitigation is effective, including responsible party, timing, and method(s) to be used.

DNR will use field monitoring resources on a site-by-site basis, to include:

- The statewide network of permanent air quality monitors
- Temporary air quality monitors deployed by DNR and the United States Forest Service
- Distributed private monitoring networks, such as the Purple Air Monitoring network
- Local webcams for visual confirmation of air quality conditions
- Field observations by DNR Region staff.

b) Identify any plans or strategies for updating this proposed action based on deviation from impact projections or other criteria.

The Smoke Management Plan Update Task Force has adopted an adaptive management module that creates a procedure for updating the Plan based on new information or changing conditions. Further, we are instituting a five-year update cycle as part of the new Smoke Management Plan.

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WAC 197-11-444, Elements of the Environment

Natural Environment
a. Earth
   Geology, Soils, Topography, Unique physical features, Erosion/enlargement of land area
b. Air
   Air quality, Odor, Climate
c. Water
   Surface water movement/quantity/quality, Runoff/absorption, Floods
d. Plants and animals
   Habitat for and numbers or diversity of species of plants, fish, or other wildlife, Unique species, Fish or wildlife migration routes
e. Energy and natural resources
   Amount required/rate of use/efficiency, Source/availability, Nonrenewable resources, Conservation and renewable resources, Scenic resources

Built Environment
a. Environmental health
   Noise, Risk of explosion, Releases or potential releases to the environment affecting public health
b. Land and shoreline use
   Relationship to existing land use plans and to estimated population, Housing, Light and glare, Aesthetics, Agricultural crops
c. Transportation
   Transportation systems, Vehicular traffic, Waterborne, rail, and air traffic, Parking,
Movement/circulation of people and goods, Traffic hazards
d. Public services and utilities
    Fire, Police, Schools, Parks and other recreational facilities, Maintenance, Communications,
    Water/storm water, Sewer/solid waste, Other governmental services or utilities