



# NATIONAL ASSOCIATION OF STATE FORESTERS

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March 28, 2023

Joseph Goffman

Principal Deputy Assistant Administrator, Office of Air and Radiation  
U.S. Environmental Protection Agency  
EPA Docket Center, Air and Radiation Docket, Mail Code 28221T,  
1200 Pennsylvania Avenue NW, Washington, D.C. 20460

Docket No. EPA-HQ-OAR-2015-0072; Reconsideration of the National Ambient Air Quality Standards for Particulate Matter

Dear Deputy Assistant Administrator Goffman,

The National Association of State Foresters (NASF), in cooperation with the National Alliance of Forest Owners (NAFO), the Society of American Foresters (SAF), and the Forest Landowners Association (FLA) are pleased to provide comments on the Reconsideration of the National Ambient Air Quality Standards for Particulate Matter (EPA-HQ-OAR-2015-0072). NASF represents the heads of state forestry agencies for all 50 states, five U.S. territories, three nations in compacts of free association with the U.S., and the District of Columbia. Our members, the nation's state foresters, support private landowners in sustainable forest management, which includes the use of prescribed fire, and provide wildfire response across lands of all ownerships. Data from the National Interagency Fire Center (NIFC) shows that state forestry agencies respond to 83% of wildfires<sup>1</sup>. Additionally, NASF conducts a biennial survey of prescribed fire use across the nation providing the authoritative source of data in this area. The most recent report shows 9.4 million acres treated using prescribed fire in 2020.<sup>2</sup>

Given our primary areas of expertise are forestry management and wildfire response, we do not see it as appropriate to comment on the level at which EPA should set the primary annual PM<sub>2.5</sub> standard at, nor to comment on potentially amending the daily standard. We trust EPA to use the best available science to set these levels where needed to protect public health. As managers of both prescribed fire and wildfire, we see firsthand the impacts that high levels of particulate matter can have on our firefighters and the public, and we take seriously efforts to reduce those impacts. Measures our agencies take to reduce the impacts of smoke on both firefighters and communities include identifying smoke sensitive areas establishing mitigation measures for burning around those areas, establishing state smoke management guidelines, including dispersion/lifting models, air mass capacities and regularly rotating fire personnel out of areas with high concentrations of smoke when responding to wildfires.

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<sup>1</sup> [https://www.predictiveservices.nifc.gov/intelligence/2022\\_statsumm/annual\\_report\\_2022.pdf](https://www.predictiveservices.nifc.gov/intelligence/2022_statsumm/annual_report_2022.pdf)

<sup>2</sup> [https://www.stateforesters.org/wp-content/uploads/2023/01/2021-National-Rx-Fire-Use-Report\\_FINAL.pdf](https://www.stateforesters.org/wp-content/uploads/2023/01/2021-National-Rx-Fire-Use-Report_FINAL.pdf)

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We do wish to raise an issue that must be considered. It is nearly universally agreed that a significant increase in prescribed fire and fuels treatments is needed to reduce wildfire threats and aid in ecosystem maintenance, restoration, and resilience across the country. The U.S. Department of Agriculture's Forest Service estimates a billion acres of land across America are at risk of catastrophic wildfires. Prescribed fire is a tool relied upon by natural resource professionals to reduce hazardous levels of vegetation that provide fuel for wildfires, and promote fire adapted ecosystems by simulating natural wildfire disturbance through carefully planned and managed ignitions. Many forests are fire adapted ecosystems, relying on low intensity wildfire to help them regenerate and improve conditions for wildlife habitat and native plant species. Prescribed fire can help to reduce hazardous fuel loads and protect communities from catastrophic wildfire and its associated heavy concentrations of smoke, minimize the spread of forest pest insects and disease, remove unwanted species that threaten species native to an ecosystem, provide forage and improved habitat for wildlife, recycle nutrients back into the soil, and promote the growth of trees, wildflowers and other plants.

Prescribed fire is a necessary tool for reducing threats from wildfire and improving the health of our forests. Healthy forests provide a number of public benefits including clean air and water, watershed protection, carbon sequestration, and rural jobs. All of these benefits help improve the efficacy of our forests to help address climate change, and in turn, aid the EPA in achieving its goals for reducing greenhouse gases, ensuring community safety, and improving air and water quality.

It is important that through any proposed rulemaking, we do not place undue or unintended restrictions or hardships on the ability of landowners, both public and private, to conduct prescribed burning. As air quality standards tighten, the likelihood of prescribed fire causing an exceedance in the standards increases, even in areas where fire has been utilized effectively, such as in the southeast. The potential impact is also significant in areas facing a hazardous backlog of fire use and fuels treatments, such as in the west.

We appreciated the EPA's recognition in its 2016 Exceptional Events Rule of the nature of both wildfire and prescribed fire emissions related air quality monitoring data. It recognized fire as part of U.S. ecosystems and the importance of managing wildfire for resource benefit where appropriate, with fuels treatments, and with prescribed fire to reduce the risk of catastrophic wildfire. In doing so, it allowed for state environmental agencies to remove fire-related particulate-matter exceedances from monitoring data that may impact non-attainment determinations. However, to our knowledge, the exceptional event determination process for fire has not been used to date by any state agency.

If EPA lowers the annual primary standard as proposed, it will be increasingly important to ensure state agencies have the tools and understanding to pursue the exceptional events process. As wildfire experts, state forestry agencies have an essential role in the process and stand ready to assist, but anything EPA can do to proactively support state environmental agencies in this area will be key. This may include, but not be limited to, streamlining processes, issuing clear guidance, and providing training.

Going forward under a lowered standard, it will be increasingly important for EPA staff both at the national and regional levels to proactively engage with state foresters and other wildfire and prescribed fire stakeholders. Building and strengthening relationships will be key to help all parties meet their missions – EPA and state environmental agencies to protect public health and state forestry agencies to sustainably

manage our nation's forests and protect them from catastrophic wildfire. One excellent example of where this relationship building is currently happening is in the south with biennial regional smoke summits.<sup>3</sup> These events bring together state forestry, state air quality, and EPA Region 4 personnel to identify regional prescribed fire and air quality activity coordination needs, build relationships, and develop goals and actions to guide collaboration between summits.

Ensuring prescribed fire remains in the toolbox for land managers across the country is critical for reducing wildfire risk to communities and ensuring healthy forests continue to provide clean air and water, carbon sequestration, and rural jobs, which help EPA achieve its mandates including ensuring community safety, improving air and water quality, and reducing greenhouse gas emissions. We have seen firsthand too many examples from Gatlinburg, TN in the east to Paradise, CA in the west where the build-up of hazardous fuels combined with the right weather conditions have been devastating. We need to do everything we can to ensure our nation's communities are safe from wildfire and its associated smoke and air quality threats. Catastrophic wildfire, which can be forest stand replacing and has the potential to burn across an unmanaged amount of acres is more likely to produce higher levels of PM compared to a properly managed prescribed fire, targeting a finite number of acres in a way to reduce only the understory trees. Additionally, catastrophic wildfire and subsequent burned area erosion cause significant impacts to water quality, particularly in rural communities. The more prescribed fire we can put on the landscape, the more likely we are to avoid catastrophic wildfire and associated impacts on water quality.

Thank you for your consideration of these comments, and your continued proactive engagement with state forestry agencies on smoke management.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kacey KC', with a long horizontal flourish extending to the right.

Kacey KC  
NASF President  
Nevada State Forester

Endorsed by:  
Forest Landowners Association  
National Alliance of Forest Owners  
National Association of State Foresters  
Society of American Foresters

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<sup>3</sup> <https://southernwildfire.net/success-stories/smoke-summits-work-toward-achieving-both-air-quality-and-prescribed-fire-goals/?searchterm=Smoke%20summit>