



NATIONAL ASSOCIATION OF STATE FORESTERS

444 North Capitol Street NW | Suite 387 | Washington, DC 20001 | www.stateforesters.org

August 5, 2024

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Via email: goffman.joseph@epa.gov

Dear Mr. Goffman:

Our association is writing to you today to raise a critical issue related to national ambient air quality data and prescribed fire. As you are aware, the EPA recently lowered the PM2.5 National Ambient Air Quality Standard (NAAQS) from 12 mg/m³ to 9 mg/m³. In the final rulemaking for this decision, the EPA also continued to recognize and support the applicability for exceptional events demonstrations for prescribed fire. We appreciate the tools EPA has released since the final rulemaking, including tools for data visualization, the PM2.5 Wildland Fire Exceptional Events Tiering Document, and the prescribed fire exceptional events demonstration from Nevada County, CA.

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.

With the new lowered PM2.5 NAAQS in place, we expect an immediate increase in exceptional events demonstrations for prescribed fire. For example, the Georgia Environmental Protection Department (EPD) envisions submitting over 100 demonstrations for 2022 and 2023 data needing to be approved by February 2025 to meet its data needs for documenting attainment of the new standard across the state. Based on an assessment of areas at risk of non-attainment

Executive Director
Jay Farrell

2023-2024 Executive Committee

President Scott Phillips, SC
Vice President Patty Cormier, ME
Treasurer Jason Hartman, KS
Past President Kacey KC, NV

Northeast-Midwest Representative Tee Jay Boudrea, RI
West Representative David Smith, HI
South Representative Russell Bozeman, MS

under the new standard which also have significant need for prescribed burning to maintain forest health, we understand at least 27 other states are likely to have need for an adequate exceptional events process. At present, the EPA has only received and processed one such demonstration, from April 20, 2021, at the Grass Valley monitoring site (Air Quality System Site ID 06-057-0005) in Nevada County, California¹.

With this in mind, we ask that EPA proactively prepares, in partnership with state foresters and state air quality agencies, for significantly increased use of the prescribed fire exceptional events process at each of its regional offices. It is essential that we learn from the demonstration example in California, with a focus on finding ways to both shorten required documentation and processing timelines leading to a decreased workload on state and federal staff to go through the process.

In particular, we request your support in ensuring that each EPA regional office:

1. Is adequately oriented to handle and process exceptional events demonstrations, with at least one staff person designated as the point of contact for state engagement throughout the process;
2. Issues clear guidance to state agencies on what documentation is needed for an exceptional events demonstration to be approved, which, to the extent possible, is aligned across EPA regions; and
3. Establishes clear internal and external timelines for processing and approval of exceptional events demonstrations that adequately meet state data needs.

Associated with these asks, we would like to reiterate our association comments from the November 2023 public comment period for EPA's proposed Revisions to the Air Emissions Reporting Requirements (EPA-HQ-OAR-2004-0489). These comments highlight significant reporting burdens that EPA is envisioning for prescribed fire, which would make use of the Exceptional Events rule even harder.

Thank you for your prompt attention to this critical issue, and we look forward to continuing the strong partnerships we currently have with your office and the EPA regional offices in implementing the Clean Air Act.

Sincerely,



Scott Phillips
President, National Association of State Foresters
South Carolina State Forester

¹ <https://www.epa.gov/air-quality-analysis/exceptional-events-documents-particulate-matter-nevada-county-ca>