



SOUTHERN GROUP OF STATE FORESTERS

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May 22, 2015

Environmental Protection Agency
Air and Radiation Docket and Information Center
Attention Docket ID No. EPA-HQ-OAR-2013-0691,
Mailcode: 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: EPA Proposed Rule for Fine Particulate NAAQS – State Implementation Plans

To Whom it May Concern,

The Southern Group of State Foresters (SGSF) would like to thank the EPA for the opportunity to comment on the proposed rule for Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements (80 Fed. Reg. 15340).

The SGSF is a non-profit organization representing the thirteen Southern state forestry agencies, Puerto Rico and the Virgin Islands. The respective agencies are responsible for providing wildfire prevention and suppression on state and private lands, as well as forest management assistance. In the South, this involves 214 million acres of forestland, of which 89% (180 million acres) are owned by more than 5 million individual private land owners.

As noted in the proposed rule, wildfires pose a direct threat to public safety—a threat that can be mitigated through management of wildland vegetation. Historically, attempts to suppress the vast majority of wildfires have resulted in unintended consequences on the landscape, including elevated risk to both humans and ecosystems. The use of prescribed fire can influence the occurrence, behavior, and effects of catastrophic wildfires which may help manage the contribution of wildfires to background PM_{2.5} levels and periodic peak PM_{2.5} events. Additionally prescribed fires can have benefits to those plant and animal species that depend upon natural fires for propagation, habitat restoration, and reproduction, as well as myriad ecosystem functions (*e.g.*, carbon sequestration).

The SGSF is pleased the EPA recognizes in the proposed rule the importance of prescribed fire, which mimics a natural process necessary to manage and maintain fire-adapted ecosystems, while reducing risk of uncontrolled emissions from catastrophic wildfires. We are also pleased to see that EPA is committed to working with federal land managers, tribes, and states to effectively manage prescribed fire use to reduce the impact of wildfire related emissions on

PM_{2.5}. As also noted in the proposed rule, fires are one tool that can be used to reduce fuel load, unnatural forest understory conditions, and tree density, helping to reduce the risk of catastrophic wildfires. The use of prescribed fire can influence the occurrence of catastrophic wildfires, which may reduce the probability of fire-induced smoke impacts and subsequent health effects.

The SGSF supports EPA's inclusion in the proposed rule of the concept of using vegetation management and prescribed fire as a Reasonably Available Control Measure (RACM). This would help mitigate PM_{2.5} resulting from wildfires, while also resulting in many other human and ecological co-benefits. We look forward to continuing to partner with EPA on this topic. Fire, whether it be prescribed fire or wildfire, is an inevitable reality in the South, but by working together we can effectively manage for both public health and safety and forest health.

Sincerely,

A handwritten signature in black ink, appearing to read "George Geissler", with a long horizontal flourish extending to the right.

George Geissler
State Forester, Oklahoma
Chair, Southern Group of State Foresters