



SOUTHERN GROUP OF STATE FORESTERS

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Environmental Protection Agency
EPA Docket Center
Mailcode 28221T
Attention: Docket ID No. OAR-2008-0699
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Proposed Changes in the National Ambient Air Quality Standard for Ozone

To Whom it May Concern,

The Southern Group of State Foresters (SGSF) would like to thank you for the opportunity to comment on the proposed changes in the National Ambient Air Quality Standards for ozone (79 Fed. Reg. 75234).

The SGSF is a non-profit organization representing 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.

We submit these comments with the recognition that we are not in a position to comment on whether or not lowering the ozone standard is appropriate. We suggest that decision be left to those with more expertise in the applicable disciplines. However, our members extensive expertise in the realm of fire management (both prescribed fire and wildfire), including the relationships between fire emissions and ozone formation, provides the backdrop for our comments.

As noted in the proposed rule (79 Fed. Reg. 75242), fire in the forest is a natural occurrence. Natural fuels that are allowed to accumulate predispose the forest to increased wildfire and subsequently produce more smoke than



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would otherwise be generated by prescribed burning. Additionally wildfires preclude fire managers' use of smoke management techniques that would reduce the amount of smoke produced, or direct it away from smoke-sensitive population centers.

We appreciate the recognition of the important role that prescribed fire plays in reducing the number and intensity of wildfires by reducing the accumulation of natural woody fuels. Prescribed burning allows the managers of federal, state and private lands to burn under atmospheric conditions and use smoke management techniques that minimize the amount of smoke produced (and subsequently ozone) and its impact on the public. In almost all cases in the South, prescribed fire is the only practical means of reducing the buildup of natural fuels in the forest that create a high risk of wildfire.

As you have noted, if EPA does lower the ozone standard to between 65 to 70 parts per billion, additional counties would be designated as out of compliance, and state air quality agencies would thus be required to develop State Implementation Plans (SIP) to make progress toward getting in compliance with this new standard. The SGSF requests that EPA encourages through guidance that States should not restrict prescribed burning for forestry or wildlife proposes within SIPs. As EPA has noted, while prescribed burning emits ozone precursors, it may also result in a net reduction of ozone.

We again thank EPA for the opportunity to comment on this proposal, and look forward to continuing to work as partners on this issue. As referenced in the proposed rule (79 Fed. Reg. 75383), partnership between the federal government, states and tribes is the most efficient way to effectively manage the impacts of fire on ozone formation. Fire, whether it be prescribed fire or wildfire, is an in evitable reality in the South, but by working together we can effectively manage for both public health and safety and forest health.

Sincerely,

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