



March 28, 2023

Lars Perlmutter
Health and Environmental Impacts Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code C539-04
Research Triangle Park, NC 27711

RE: Docket No. EPA-HQ-OAR-2015-0072; FRL-8635-01-OAR – Reconsideration of the National Ambient Air Quality Standards for Particulate Matter

Dear Mr. Perlmutter:

The California Forest Watershed Alliance (CAFWA) is a unique coalition of diverse interests including organizations that represent water, environment, local government, timber, and agricultural interests all dedicated to finding solutions to California's every-growing forest health and wildfire problem. The members of CAFWA are:

- Association of California Water Agencies (ACWA);
- California Farm Bureau (CAFB);
- California Forestry Association (Calforests);
- The Nature Conservancy (TNC); and
- Rural County Representatives of California (RCRC).

Since its founding in 2014, CAFWA members have been working together to seek new ways to promote proactive, science-based, and ecologically sound forest management practices that will reduce the risk of destructive megafires. Our goal is to protect our forests, our natural resources, and our local economies and communities by accelerating the pace and scale of forest restoration.

Improving forest stewardship in California has been challenging, particularly given the varying management strategies that are needed in order to restore our state's forest lands to a more resilient and sustainable condition. One of the most vital components of reducing wildfire fuels



The California Forest Watershed Alliance (CAFWA) is an urban-rural coalition representing water interests, local governments, the conservation community, agriculture, and the forestry sector, created to promote the restoration and improvement of California's forested watersheds. For more information, visit www.caforestsandwatersheds.org.

in overgrown forest lands is prescribed fire, a tool which was used for generations by indigenous people to promote culturally important vegetation and reduce forest density. In the past century, we have altered historical fire regimes through excessive suppression practices and hesitance to mechanically thin forest stands, which has led to the excessive fuel accumulation we see today in many of our forested landscapes.

California's wildfire seasons have grown longer and more severe. Extended periods of drought resulting from a changing climate has made it critical to increase the pace and scale of fuel reduction across our state. Recent studies have illuminated the extreme duration of smoke exposure since the mid-2010's due to catastrophic wildfires, with more than 1.5 million people in the western United States routinely exposed to levels of smoke that carry immediate risk in wildfire prone regions.¹ These studies are also showing that these fires have effectively negated much of the good work done by state, federal and local air pollution reduction measures because of the frequency and severity of the particulate emissions from each wildfire event.

Our organizations have a vested interest in ensuring wildfire prevention, suppression, and forest recovery investments by the state are sufficient to mitigate and prevent the catastrophic wildfires that have plagued the state in recent years. Prescribed fire is a crucial component in California's forest resilience efforts, as properly managed burns can provide numerous ecosystem benefits including reducing excess brush, shrubs and small-diameter trees, encouraging new growth of native vegetation, and maintaining plant and animal species whose habitats depend on natural, episodic fire. Additionally, when used as part of a larger fuels reduction treatment plan, regular, planned use of prescribed fire has also been shown to prevent the kinds of catastrophic wildfires that have set back California's particulate matter (PM) emissions reductions goals in the past decade.

Due to California's tremendous fuels treatment needs, our organizations must express concern with the impacts from the U.S. Environmental Protection Agency's (EPA) Reconsideration of the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM) as proposed on beneficial fire. Currently, the proposal is to reduce the primary annual average PM_{2.5} NAAQS from 12 ug/m³ to between 8 ug/m³ and 10 ug/m³. This proposed change would significantly limit the number of windows available in California for land managers to conduct essential prescribed burns to prevent future catastrophic wildfires at a time when state and federal land managers, including the USDA Forest Service (Forest Service) are acknowledging the dire need to increase prescribed fire on the landscape. Further, limiting prescribed burn windows at this critical stage in California's efforts to pursue and maintain forest resilience, would be disastrous to both our state's air quality goals and the public health and safety of its residents.

¹ Daily Local-Level Estimates of Ambient Wildfire Smoke PM_{2.5} for the Contiguous US. Marissa L. Childs, Jessica Li, Jeffrey Wen, Sam Heft-Neal, Anne Driscoll, Sherrie Wang, Carlos F. Gould, Minghao Qiu, Jennifer Burney, and Marshall Burke. *Environmental Science & Technology* **2022** 56 (19), 13607-13621

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Furthermore, while we understand that EPA considers prescribed burns covered under the Exceptional Events Rule, the 2016 regulatory process that codified the conditions under which prescribed fires could qualify as exceptional events is not sufficient enough to enable a robust prescribed fire program. Exceptional Events filings are also resource-intensive and are often denied by local air boards. Without explicit regulatory allowances for prescribed fire to cause NAAQS exceedances, our organizations fear that the proposal could reduce potential burn windows by as much as 80 percent.

The members of CAFWA strongly urge EPA to develop regulations that enable greater use of prescribed fire in tandem with the NAAQS in order to prevent future emissions from high severity wildfires. We appreciate your consideration of our comments and are happy to discuss further if you have any questions.

Sincerely,



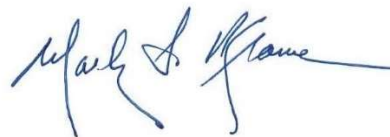
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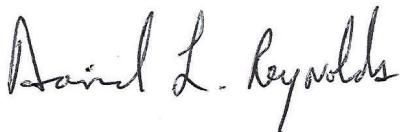
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