



May 31, 2023

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The Honorable Doug LaMalfa
U.S. House Of Representatives
Washington, DC 20515

Dear Congressman LaMalfa:

It was a pleasure to meet you at the Subcommittee on May 16, on
“Examining the Challenges Facing Forest Management, Wildfire
Suppression, and Wildfire Firefighters Ahead of the 2023 Wildfire Year.”

After the hearing you asked if I would send you follow up information
on EPA’s proposed revisions to the National Ambient Air Quality
Standards for particulate matter (“PM 2.5”). This revision, if
implemented as proposed, would severely impede the use of
prescribed fire. We are concerned that this change will result in a
significant limitation on available burn days in many areas across the
U.S. Many of our fire scientists and agency experts worry this new rule
will stifle the state and federal plans to expand the use of prescribed
fire as a core strategy to stem out-of-control wildfires. The proposed
rule is currently not finalized and still under consideration by EPA.

The National Association of Forest Service Retirees, have [submitted comments detailing their concern \(PDF\)](#) that the proposed rule “will reduce the Nation’s ability to implement strategies intended to reduce unwanted wildfire effects on communities and forest lands, including barriers to increasing the pace and scale of prescribed burning.”

Many of our county’s scientists view prescribed burning as [a protective trade-off](#) — some pollution now in exchange for greater fire safety and less pollution in the future. Smoke from prescribed fires is less intense and less damaging than smoke from wildfires.

The EPA is aware of these concerns around prescribe fire. In its proposed rule, it acknowledges the importance of having prescribed fire. EPA has said that [prescribed fires have the potential to qualify for exceptional events \(PDF\)](#), which could encourage its continued and expanded use. Some outside groups, however, have raised concerns about the legal underpinning of such an approach. A recent Government Accountability Office report says [the EPA could do a better job working with other agencies to reduce impacts from wildfires \(PDF\)](#), including making it easier to conduct prescribed fires. GAO went on to say that state and local agencies are not likely to use the exceptional events provision for prescribed burns because “the agencies would not likely approve prescribed burns that could cause National Ambient Air Quality Standards exceedances in the first place.” And they said that “exceptional event demonstrations are technically complicated and resource intensive.”

EPA’s final decision on its air quality PM 2.5 standard will determine the course for how much prescribed burning is allowed or not allowed on the part of air districts over the next five to 10 years. Our hope is that the final rule will prioritize both the protection of air quality while also allowing for the continued and expanded use of prescribed fire to reduce future wildfire effects on communities and forests lands.

If you have any questions or wish to discuss these comments with our organization, I can be reached at rmcnair4953@gmail.com or 208-660-4994.

Sincerely,

Ranotta McNair

Ranotta McNair, Board Member
National Association of Forest Service Retirees (NAFSR)