

Excerpt on wildland fire emissions, in the context of "how air agencies and the EPA will move forward to implement the 2015 ozone standards"

from:

Janet G. McCabe. October 1 2015. Memorandum from the EPA Office of Air and Radiation Re: Implementing the 2015 Ozone National Ambient Air Quality Standards.

Full text available at:

<http://www3.epa.gov/ozonepollution/pdfs/20151001memo.pdf>

standards. We are committed to working with states as they engage their most vulnerable communities toward achieving this goal.

Opportunity for Multi-pollutant Planning. Ozone pollution does not need to be addressed independently from other air pollution concerns. Emissions affecting compliance with other criteria pollutant NAAQS and contributing to greenhouse gases may have similar sources. We encourage air agencies to consider multi-pollutant planning, as a means to ensure environmental protection and at the same time take advantage of potential efficiencies, synergies, and provide more certainty to the regulated community. It is possible to work within the statutory requirements to plan and implement in a multi-pollutant fashion. Most recently, in the preamble for the final Clean Power Plan, the EPA noted “... the Clean Power Plan provides an opportunity for states to consider strategies for meeting future CAA planning obligations as they develop their plans under this rulemaking. Multi-pollutant strategies that incorporate criteria pollutant reductions over the planning horizons specific to particular states, jointly with strategies for reducing CO₂ emissions from affected EGUs needed to meet Clean Power Plan requirements over the time horizon of this rule, may accomplish greater environmental results with lower long-term costs.” We believe that the coincident planning periods for the Clean Power Plan and the NAAQS for ozone, PM_{2.5} and SO₂, and for the Regional Haze program, should encourage states to take a multi-pollutant approach in addressing these regulatory requirements.

Emissions from Wildland Fires. We understand that fire is an unavoidable occurrence on many types of wildland, and that changing climate conditions will increase the occurrence of damaging wildfires unless fuel loads are managed by other means including science-based use of prescribed fire.^{12,13,14} Emissions from fires on wildland, particularly large wildfires, can impact concentrations of ozone and other harmful pollutants, such as PM_{2.5}, both in the locations with fire and downwind. In areas where wild fires have been prevalent or are likely, we encourage air agencies to work with state, federal and private land managers on promoting prescribed fire and other strategies that may reduce wildfire emissions and their effects on ozone exceedances; we appreciate that such strategies may have other public safety, ecological, and property protection benefits as well. Recognizing the importance of various fire management strategies, in the proposed revisions to the Exceptional Events Rule we intend to encourage air agencies to rely on burn managers’ use of basic smoke management practices¹⁵ by identifying a set of generally applicable practices that would be employed during prescribed fires. The EPA and the federal land management agencies will support state efforts to educate the public on the ecological role of fire, and wildfire and prescribed fire concepts. Where a prescribed fire program has been developed and is being implemented in and/or upwind of a nonattainment area, the EPA recommends that air agencies account for the expected prescribed fire emissions in the attainment and maintenance planning process. In those areas where prescribed fires are known to be capable of causing occasional ozone exceedances, the EPA will continue to work with air agencies and stakeholders to improve the long-term effectiveness of the existing basic smoke management practices and smoke management programs.

¹² The Administrator’s finding on the adverse effects of greenhouse gases included the observation that wildfires have increased, and that there are potential serious adverse impacts from further wildfire occurrence. (74 FR 66530, December 15, 2009).

¹³ *Climate Change in the United States: Benefits of Global Action*, U.S. EPA, EPA-430-R-15-001, June 2015. Available at <http://www2.epa.gov/cira>.

¹⁴ *The National Strategy: The Final Phase in the Development of the National Cohesive Wildland Fire Management Strategy*, Report to Congress developed by the U.S. Department of Agriculture and the U.S. Department of the Interior, April 2014. Available at <http://www.forestsandrangelands.gov/strategy/thestrategy.shtml>.

¹⁵ *Basic Smoke Management Practices*, October 2011, U.S. Forest Service and Natural Resources Conservation Service, http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1046311.pdf.