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Hi and thank you for the opportunity to comment today. My name is Karina Silvas-Bellanca and I am here today representing Sierra Forest Legacy, a conservation based organization focused on protecting and promoting resilience to forest in the Sierra Nevada. I am also here today representing the Southern Sierra Prescribed Fire Council, a group that is dedicated to promoting the responsible use of prescribed fire to restore forest to a more resilient condition.

More stringent ground level ozone standards as proposed will dramatically increase the areas in the U.S. that fails to meet the standards. In California, (as well as other States) there are many ecosystems that are fire dependent where it may become more difficult to use fire to maintain fuel loading, plant and wildlife habitat quality, long-term sustainability of forests and rangeland resources, and increases the risks to public health and safety.

Nationally, an increase in standards from 75 ppb to 70 ppb will result in a doubling of federal and non-federal acres that will be in nonattainment (that is 140 acres currently to 280 million acres). In California, nearly 2/3rds of the state would fall under non-attainment if the EPA determines 60 ppb is the new standard. Many of the non-attainment areas will be in the Sierra Nevada, Coastal, and Klamath Regions of California, which are fire-dependent and these standards could lead to control strategies that will make it more difficult to use fire leading to increased susceptibility of forests to high severity wildfires. These uncharacteristic fires produce long duration and widespread smoke events that have widespread and negative impacts on communities, both from a health perspective and economic impacts as well. Prescribed fire activities are vital to maintain and enhance the resiliency of these ecosystems, and to prevent long duration, severe wildfires like the Rim Fire and King Fire.

In the proposed Rule, EPA acknowledges the complex inter-relationship of wildfire, prescribed fire and fuels, but there is no specific language to ensure prescribed fire activities will be treated any differently than other contributing industrial sources in non-attainment areas. Wildfire is noted as a “natural background” condition but no clear statement made to outline how prescribed fire dependent ecosystems fit into natural background. This is concerning for California because the ecosystems are in a deficit of “good fire”, fire that promotes resilience to stressors such as climate change and uncharacteristic wildfires. The EPA does not address the current changes in climate trends and links to increasing wildfires, but does point out these trends could result in more stringent requirements to make progress towards attainment.

We urge the EPA to take a closer look at these trends and the relationship of smoke events produced by uncharacteristic and large smoke events (like Rim and King

Fires) vs. short duration events caused by prescribed fire activities. Additionally, the proposal outlines the Exceptional Events Policy to exclude wildfires for nonattainment. This is a risky strategy because costs to monitor are high and the current policy is not user friendly. The current policy is being avoided due to high costs of monitoring and reporting events.

In closing, the EPA should clarify and consider how the proposed changes to the ground level ozone standards will affect natural fire regimes and how fuel accumulations will be addressed in fire-dependent ecosystems and consider these activities as natural background conditions.

Thank you.