



THE ALABAMA CHAPTER OF THE WILDLIFE SOCIETY

March 27, 2023

Docket # EPA-HQ-OAR-2015-0072
Environmental Protection Agency
EPA Docket Center, Air and Radiation Docket
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

To Whom it May Concern:

The Environmental Protection Agency (EPA) proposed a rule (Proposed Rule) in the federal register (88:5558-5719) on January 27, 2023 to lower the primary annual/daily PM_{2.5} levels. The Alabama Chapter of The Wildlife Society appreciates the opportunity to provide comments on the Proposed Rule.

Founded in 1937, The Wildlife Society (TWS) is an international network of over 11,000 leaders in wildlife science, management and conservation who are dedicated to excellence in wildlife stewardship. The mission of TWS is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation. The Alabama Chapter of TWS (ACTWS) was formed in 1978 and has a current membership of approximately 125 wildlife professionals representing academia, state and federal agencies, non-governmental organizations and private industry.

The majority of our membership is comprised of biologists whose primary focus is habitat and/or species management. It would not be appropriate for us to comment on the level of needed revisions to the PM_{2.5} standards. We believe EPA should use the best available science to determine where these levels should be set to protect human health.

However, the scientific community has almost universally accepted that significantly more prescribed fire needs to be applied to our country's landscape to aid in ecosystem maintenance, restoration and resilience. In Alabama, prescribed fire has been used for many decades to benefit species such as bobwhite quail, white-tail deer and the Eastern wild turkey. More recently, regional partnerships through federal and state agencies, as well as non-governmental organizations, have occurred to proactively apply prescribed fire for the benefit of threatened, endangered or imperiled species such as red-cockaded woodpeckers, gopher tortoises, indigo snakes and many more species in fire-dependent habitats. The Wildlife Society also provides detailed information on the effects of prescribed fire on wildlife and wildlife habitat across North America in its [2016 Technical Review](#).

It is imperative that any revisions to the PM_{2.5} standards not cause any unintended consequences that limit the ability of landowners, both public and private, to apply prescribed fire to the landscape for the purposes of ecosystem restoration and management, including wildlife habitat management and fuels

reduction. EPA recognized fire as a tool to be used by landscape managers in its 2016 Exceptional Events Rule. This rule allowed state environmental agencies to remove fire-related particulate matter exceedances from monitoring data that might possibly impact non-attainment determinations. Prescribed fire could possibly cause additional particulate matter exceedances if standards are lowered through the Proposed Rule. We don't know if the 2016 Exceptional Events Rule has been utilized in Alabama but moving forward it appears to be an essential component of ecosystem management if EPA lowers the PM_{2.5} standards. EPA engagement with and training of state agencies, prescribed fire councils and other parties involved in prescribed fire activities (both application and monitoring) regarding the 2016 Exceptional Events Rule and other facets of the Proposed Rule will be imperative to allow for this highly beneficial management tool to be applied as needed for the benefit of our natural landscapes.

Increased application of prescribed fire also can reduce the risk of catastrophic wildfire which has many detrimental impacts to our nation's citizenry and environment. Keeping prescribed fire in the toolbox of land managers is essential for many reasons including health and human safety, as well as the benefits to our nation's landscape and wildlife resources.

Again, we appreciate the opportunity to comment on the Proposed Rule and look forward to your proactive engagement with entities involved in application of prescribed fire to our nation's landscape.

Submitted on behalf of the Executive Board of the Alabama Chapter of The Wildlife Society.

A handwritten signature in cursive script that reads "J. Allison Cochran".

Allison Cochran, President
Alabama Chapter of The Wildlife Society