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Comment On: FEMA-2017-0032-0001
Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

Document: FEMA-2017-0032-DRAFT-0001
Unrelated Comment Submitted by Anonymous

Submitter Information

Name: anonymous anonymous

General Comment

Nearly 8 million acres have burned in 2017, such wildfires will release thousands of tons of greenhouse gas emissions and other harmful air pollutants." impact of wildfires on the atmosphere. After smoke from the Chetco Bar Fire forced the Ashland Shakespeare Festival to cancel performances last month due to smoke and haze, Rep. Greg Walden declared, "Enough is enough." Newspaper report, 2007 said California wildfires pumped nearly 8 million metric tons of climate-warming carbon dioxide into the atmosphere, nov 29 2016 Wildfire smoke can result in significant air quality impacts to public health. Then we have 2017 wildfire again. Another report from Scientists study estimated that Fires in US release millions metric tons of carbon dioxide per year. Wildfires can produce more greenhouse gas (GHG) emissions then gas and oil , therefore we should manage forest better by stopping the regulations against clear cutting to help prevent co2 from mass wildfires in western states. US Forest service page; fuels buildup to unnatural levels and forests become overcrowded. This led to forests being more susceptible to insects and disease outbreaks, but also to unnaturally large fires on the landscape. Another report : , "Forest fires may produce as much co2 as half of all fossil-fuels burned", US Forest Service page, 2015 Pacific Northwest wildfire season Washington 130,000 tons Oregon 90,000 tons of fine particulate matter The greenhouse gas emissions alone were equivalent to more than 8.5 million passenger vehicles driven for a year or heating 3.7 million homes. government charge or fine california for Co2 wildfire pollutants? US forest service page wildfire report on 2015 year reported on greatest threat to many endangered species and their

habitat is catastrophic WILDFIRE leads to susceptible to insects and disease outbreaks ...MUST do thinning forest to protect habitat and more resistant to insect predation. concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, potential for catastrophic fire..... Currently, even utility crews must receive Congressional approval before preforming regular maintenance or the repairing of damaged power lines. When a right-of-way is not properly maintained, a tree can grow into or fall on to a power line, causing fires . 2017 Mr Secretary Zinke accumulation and thickening of vegetation exacerbates fuel conditions and often leads to larger and higher-intensity fires," .. ... 2015 USFS Chief Dave Bosworth Said, "We Do Not Have A Fire Problem On Our Nation's Forests; We Have A Land Management Problem" LITIGATION has had a profound impact on mismanagement of our national forests, Need to update or repeal the Equal Access to Justice Act (EAJA) of 1980 , subsection of EAJA, codified at 28 U.S.C. 2412(d) section 2412(b).

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Comment On: FEMA-2017-0032-0001
Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

Document: FEMA-2017-0032-DRAFT-0002
Unrelated Comment Submitted by Anonymous

Submitter Information

Name: anonymous anonymous

General Comment

recent California wildfires tells it all, over billion dollars in cost, lives lost, TIME FOR CHANGE... The greenhouse gas emissions alone from wildfires can be equivalent to more than 8.5 million passenger vehicles driven for a year . .....2015 Subcommittee Chairman Tom McClintock (CA-04), "The greatest threat to many endangered species and their habitat is catastrophic WILDFIRE..... Yet rather than thinning the forest to protect this habitat, we're spending millions upon millions on extraordinarily long, complicated, voluminous documents that IMPEDE our ability to properly manage the forests for the benefit of all species"..... Ozone is NOT OIL AND GAS COMPANIES ...Extreme events of WILDFIRES have significant impacts on air quality especially when they occur during periods conducive to ozone formation, Findings demonstrate a clear impact of wildfires on surface O3 nearby and potentially far downwind from the fire location, which means it is not in the Flawed EPA report for Greenhouse gas. US Forest Service page, 2015 Pacific Northwest WILDFIRE season Washington 130,000 tons Oregon 90,000 tons of fine particulate matter . ..... Not surprisingly, the clear and present danger of high-intensity fires on public lands in California have increased significantly over the last 20 years. Besides reducing the risk of catastrophic fire, trees in a restored healthy forest are more resistant to insect predation. POOR MANAGEMENT ALSO HAS LESS WATER FOR THE PEOPLE ....Being thinned, trees create right-sized gaps in the canopy to allow snow to fall to the ground yet receive enough shade to be protected from melting too early, unlike closed canopies from too many trees where 15 to 60 percent of snow

never reaches the ground and is lost to evaporation. Further, in restored forests faster growing large trees sequester carbon faster than smaller trees. ..... Dave Schulz, Commissioner, Montana, in 2015 testimony, "The consequences are a domino effect that results in forest management coming to a standstill." "I think there are environmental consequences to any action we take, and if we're not cautious and careful and cooperative toothat can cause harm," Schulz reiterated during the hearing. "At the same time, there's an environmental consequence to doing nothing, and that's what I'm concerned about."..... .....USFS Chief Dave Bosworth Said, "We Do Not Have A Fire Problem On Our Nation's Forests; We Have A Land Management Problem"..... Sunday, 17 May 2015 - There is no doubt that litigation has had a profound impact on the Forest Service and subsequently the management and mismanagement of our national forests. Millions of taxpayer dollars are spent on shuffling paper, over-analysis and ensuring process is followed. We currently estimate planning and environmental analyses are roughly 60% of the costs of forest management projects," While many environmental laws were originally passed for good reason at a time when more checks and balances were needed, the situation has dramatically changed. All of us understand that significantly more restoration needs to occur through aggressive active management." Sufficient mills no longer exist to handle wood processing. Economic depression of forest communities makes rebuilding more difficult. Lengthy and complex planning processes such as NEPA, CEQA, and the ESA must be complied with before any action is taken. CARB impedes prescribed therapeutic burns while promoting the unintended consequence of enabling larger, more damaging fires. ..... the past administration Forest Service instituted a strict policy of non fire suppression. Today, timber harvest in public forests is practically non-existent. Rather than a healthy 50 to 100 trees per acre, the west slope now averages 300-plus trees per acre. This concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, or a potential for catastrophic fire.....

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Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

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Unrelated Comment Submitted by Anonymous (n n)

Submitter Information

Name: n n

General Comment

2017 This year, 8.5 million acres have burned nationwide, costing $2.5 billion to suppress. We must address the impacts of catastrophic wildfire to guarantee the constitutional right . NEPA must be reformed as well as review. fire protection regulations were primarily established with the issuance of Appendix R to 10 CFR part 50 in 1980 and the NFPA [National Fire Protection Association] 805 alternative regulations adopted in 2004. "Streamlining the process for projects with strong local support, collaborative support and support of local land management professionals should be categorically EXCLUDED FROM LITIGATION OF ENVIRONMENTIALIST. We need to allow our professional land management agencies to get back to managing the land rather than managing litigation. the threat of wildfires in the West is a ticking time bomb that will negatively affect the economy and environment active forest management will reduce the threat of wildfire to our citizens and local communities in the West. By reducing the fuel loads on our national forests we can reestablish a healthy, thriving ecosystem that improves the economy and the environment. Healthy forests are essential to clean water supplies and clean air. Biodiversity increases when we manage our forests with practical, sound, and scientific practices. Local, state and national economies enjoy the benefits of both responsible resource use and recreation. Nobody loses when our forests are healthy and resilient. increasing commercial timber harvests from our national forests, reducing fuel loads through more mechanical thinning and controlled burns, reducing the red tape to get through the National Environmental Policy Act (NEPA) process, and combating frivolous special interest

lawsuits that serve only to delay much needed management of our National Forest System. landscape-scale catastrophic wildfires in the national forests in Montana and other Western states have had a disproportionately large impact on the ecological, social and economic life of the County and our neighbors. Fire seasons last an average of 78 days longer compared to 40 years ago. As the USFS wrote in its 2015 fire budget report, "The agency is at a tipping point." Every year, wildfire suppression eats up a greater share of the USFS budget. This, coupled with the approximately $350 million a year the USFS spends complying with federal law, ultimately reduces funding for other forest management priorities. 1995, 16 percent of the USFS's annual budget went to fire suppression. Today, that number is well north of 50 percent, and by 2025 will likely amount to two-thirds of their annual budget. Nature and poor policy decisions have forced the agency to change its focus. In the past, the USFS spent the bulk of its dollars on forest management, such as commercial timber harvests and mechanical thinning, whereas today, suppression has become its major priority. Today, more staff is devoted to fighting fires than managing the forests. nightmare of red tape and regulation forces agencies to create long "bullet proof" NEPA analyses that can still be held up by frivolous litigation. Rather than managing resources, the agency is forced to manage paperwork and litigation. This contributes to the unsustainable growth in fuel loads, leading to the explosion in catastrophic fires over the past few decades. USFS has to pull money from management accounts to help combat catastrophic fires, a process known as fire borrowing. This further delays much needed timber harvests, mechanical thinning, and controlled burns, leaving the USFS with fewer resources to meet its management objectives. Solving the problem of fire borrowing must also be a component of any action taken by Congress to improve forest resiliency. Our once vibrant timber economy has been left in shambles, its infrastructure decimated and our scenic beauty scarred for decades to come. Our citizens live with severely diminished air quality for weeks or months at a time. Both our human and wildlife habitat have been, and will continue to be, negatively impacted unless Congress acts to address the problem. fire has devastated the landscapedestroying wildlife habitat, emitting smoke into the air, and jeopardizing the safety of residents. detrimental effect on local public health. Thick clouds of smoke billow into the air, and citizens breathe it in. This particularly impacts our children, sick people, and the elderly. Air quality is commonly in the "unhealthy" or "hazardous" Warm air in the daytime sometimes helps to lift smoke higher into the atmosphere, but when cooler weather sets in at night, the smoke descends back into our communities.

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Document: FEMA-2017-0032-DRAFT-0004
Unrelated Comment Submitted by Anonymous (b b)

Submitter Information

Name: b b

General Comment

Inability of the Forest Service to thin forests due to overly cumbersome and lengthy environmental processes, increasing frivolous lawsuits filed by certain litigious environmental groups, and a lack of sufficient agency focus on this challenge has led to millions acres with millions of dead trees and bushes. that are at high risk of deadly and catastrophic forest fires that endanger communities, hurt local economies, destroy land and water quality and release massive amounts of emissions into the atmosphere. Environmental litigation that has bogged down thinning projects for nearly two decades." impact of wildfires on the atmosphere, Rep. Greg Walden declared, "Enough is enough." NEED federal review on the impact of wildfires on carbon dioxide and other greenhouse gases, as well as the threat to habitat, water quality and property destruction. We can do things about forest management that make sense so we can diminish forest fires for the future, a lack of active management has left our forests overly dense and stocked with dead and dying trees that feed catastrophic wildfires," said chairman Rob Bishop. "As management decreases, forest health deteriorates and fires grow in size, density and cost." Sen. Steve Daines, Montana ; How many more thousands of acres through the West must burn before we act?" Need to figure out ways to clear the dense thicket of litigation and regulation that has for years stalled projects aimed at cutting back the federal forests, many plagued with diseased and dying trees. A lack of active management has left our forests overly dense and stocked with dead and dying trees that feed catastrophic wildfires, As management decreases, forest health deteriorates and fires grow in size, density and cost. The reignited

debate comes as the Forest Service, which falls under the Agriculture Department, has watched its firefighting expenses soar, jumping from 15 to 55 percent of the budget and forcing cutbacks in areas such as facility maintenance and recreation. we can affect how we manage these forests to reduce the impact of forest fire. Nearly 8 million acres have burned so far in 2017, making this a worse-than-average wildfire year despite the wet winter and spring. A rash of wildfires include, the biggest blaze in Los Angeles history in terms of acreage. California Gov. Jerry Brown issued a Sept. 1 executive order extending an emergency proclamation allowing any licensed professionals to "remove dead trees that threaten life, property, and the environment." four states have declared states of emergency as a result of this year's wildfires, while the Oregon fires alone have cost state and federal agencies $100 million to date, Either we are going to manage the forests," Mr. Daines said, "or the forests are going to manage us." Additional statutory tools are also necessary to reduce excessive regulatory burdens that make job-supporting and environmentally sound infrastructure projects all but impossible in this country. Congress needs to provides a strong foundation upon which America can build in the fight of special interest groups. should require a rulemaking to address programmatic approaches in environmental reviews and makes other changes to existing law that should be addressed in a rulemaking.

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Document: FEMA-2017-0032-DRAFT-0005
Unrelated Comment Submitted by Anonymous (n n)

Submitter Information

Name: n n

General Comment

California wildfires tells it all, over billion dollars in cost, lives lost, TIME FOR CHANGE... The greenhouse gas emissions alone from wildfires can be equivalent to more than 8.5 million passenger vehicles driven for a year . .....2015 Subcommittee Chairman Tom McClintock (CA-04), "The greatest threat to many endangered species and their habitat is catastrophic WILDFIRE..... Yet rather than thinning the forest to protect this habitat, we're spending millions upon millions on extraordinarily long, complicated, voluminous documents that IMPEDE our ability to properly manage the forests for the benefit of all species"..... Ozone is NOT OIL AND GAS COMPANIES ...Extreme events of WILDFIRES have significant impacts on air quality especially when they occur during periods conducive to ozone formation, Findings demonstrate a clear impact of wildfires on surface O3 nearby and potentially far downwind from the fire location, which means it is not in the Flawed EPA report for Greenhouse gas. US Forest Service page, 2015 Pacific Northwest WILDFIRE season Washington 130,000 tons Oregon 90,000 tons of fine particulate matter . ..... Not surprisingly, the clear and present danger of high-intensity fires on public lands in California have increased significantly over the last 20 years. Besides reducing the risk of catastrophic fire, trees in a restored healthy forest are more resistant to insect predation. POOR MANAGEMENT ALSO HAS LESS WATER FOR THE PEOPLE ....Being thinned, trees create right-sized gaps in the canopy to allow snow to fall to the ground yet receive enough shade to be protected from melting too early, unlike closed canopies from too many trees where 15 to 60 percent of snow

never reaches the ground and is lost to evaporation. Further, in restored forests faster growing large trees sequester carbon faster than smaller trees. ..... Dave Schulz, Commissioner, Montana, in 2015 testimony, "The consequences are a domino effect that results in forest management coming to a standstill." "I think there are environmental consequences to any action we take, and if we're not cautious and careful and cooperative toothat can cause harm," Schulz reiterated during the hearing. "At the same time, there's an environmental consequence to doing nothing, and that's what I'm concerned about."..... .....USFS Chief Dave Bosworth Said, "We Do Not Have A Fire Problem On Our Nation's Forests; We Have A Land Management Problem"..... Sunday, 17 May 2015 - There is no doubt that litigation has had a profound impact on the Forest Service and subsequently the management and mismanagement of our national forests. Millions of taxpayer dollars are spent on shuffling paper, over-analysis and ensuring process is followed. We currently estimate planning and environmental analyses are roughly 60% of the costs of forest management projects," While many environmental laws were originally passed for good reason at a time when more checks and balances were needed, the situation has dramatically changed. All of us understand that significantly more restoration needs to occur through aggressive active management." Sufficient mills no longer exist to handle wood processing. Economic depression of forest communities makes rebuilding more difficult. Lengthy and complex planning processes such as NEPA, CEQA, and the ESA must be complied with before any action is taken. CARB impedes prescribed therapeutic burns while promoting the unintended consequence of enabling larger, more damaging fires. ..... the past administration Forest Service instituted a strict policy of non fire suppression. Today, timber harvest in public forests is practically non-existent. Rather than a healthy 50 to 100 trees per acre, the west slope now averages 300-plus trees per acre. This concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, or a potential for catastrophic fire.....

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Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

Document: FEMA-2017-0032-DRAFT-0006
Unrelated Comment Submitted by Anonymous (t t)

Submitter Information

Name: t t

General Comment

..... Given the high threat of litigation and the limited resources to make and review the necessary management planning decisions, the result is truly 'Analysis Paralysis'! The cost of litigation, as well as time and effort required of USFS staff to address litigation, is a significant burden," Wildfires, Saving our forests demands we tend our garden....
.....Unfortunately, there are many impediments to restoration management of our public forests. Sufficient mills no longer exist to handle wood processing. Economic depression of forest communities makes rebuilding more difficult. Lengthy and complex planning processes such as NEPA, CEQA, and the ESA must be complied with before any action is taken. CARB impedes prescribed therapeutic burns while promoting the unintended consequence of enabling larger, more damaging fires. .....
..... Adding insult to impediments, environmentalist lawsuits frustrate forest management at taxpayer expense. In the late 19th century, the past OBAMA administration Forest Service instituted a BAD strict policy of fire suppression. Today, timber harvest in public forests is practically non-existent. Rather than a healthy 50 to 100 trees per acre, the west slope now averages 300-plus trees per acre. This concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, or a potential for catastrophic fire.....
.....Absent large wildfires, CALIF Sierra forests currently sequester enough carbon to offset the annual carbon dioxide emissions of almost 2.7 million passenger cars. In March 2011, the Forest Service in Region 5 estimated restoration is sorely needed for a return to healthy forests

in the Sierra. Management believes an environmental restoration program of unprecedented scale can alter the direction of current high-intensity wildfire trends.....
Even some environmental groups have joined the consensus that many federally managed forests are dangerously overgrown and action need be taken to remove excessive growth and turn the resulting wood and biomass into products with economic value. "Preserving dynamic ecosystems in a static state is just not possible ... Many of the things causing forests to decline is an environmental disconnect people are removed, or disconnected, from the land that feeds and shelters them." (Bonnicksen, Protecting Communities and Saving Forests, 2008, p.4)

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Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

Document: FEMA-2017-0032-DRAFT-0007
Unrelated Comment Submitted by Anonymous (y y)

Submitter Information

Name: y y

General Comment

WILDFIRE and HEALTH AND HABITAT. 2015 Subcommittee Chairman Tom McClintock (CA-04), "The greatest threat to many endangered species and their habitat is catastrophic WILDFIRE..... Yet rather than thinning the forest to protect this habitat, we're spending millions upon millions on extraordinarily long, complicated, voluminous documents that IMPEDE our ability to properly manage the forests for the benefit of all species".....Not surprisingly, the clear and present danger of high-intensity fires on public lands in California have increased significantly over the last 20 years. Besides reducing the risk of catastrophic fire, trees in a restored healthy forest are more resistant to insect predation. ..... Further, in restored forests faster growing large trees sequester carbon faster than smaller trees. .....
POOR FOREST MANAGEMENT ALSO HAS LESS WATER FOR WILDLIFE AND PEOPLE....Being thinned, trees create right-sized gaps in the canopy to allow snow to fall to the ground yet receive enough shade to be protected from melting too early, unlike closed canopies from too many trees where 15 to 60 percent of snow never reaches the ground and is lost to evaporation...
Dave Schulz, Commissioner, Montana, in 2015 testimony, "The consequences are a domino effect that results in forest management coming to a standstill." "I think there are environmental consequences to any action we take, and if we're not cautious and careful and cooperative toothat can cause harm," Schulz reiterated during the hearing. "At the same time, there's an environmental consequence to doing nothing, and that's what I'm concerned

about."".....Economic depression of forest communities makes rebuilding more difficult. Lengthy and complex planning processes such as NEPA, CEQA, and the ESA must be complied with before any action is taken. CARB impedes prescribed therapeutic burns while promoting the unintended consequence of enabling larger, more damaging fires. .....Today, timber harvest in public forests is practically non-existent. Rather than a healthy 50 to 100 trees per acre, the west slope now averages 300-plus trees per acre. This concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, or a potential for catastrophic fire..... restoration is sorely needed for a return to healthy forests. environmental restoration program of unprecedented scale can alter the direction of current high-intensity wildfire trends.....many federally managed forests are dangerously overgrown and action need be taken to remove excessive growth and turn the resulting wood and biomass into products with economic value. "Preserving dynamic ecosystems in a static state is just not possible ... Many of the things causing forests to decline is an environmental disconnect .....

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Document: FEMA-2017-0032-DRAFT-0008
Unrelated Comment Submitted by Anonymous (d d)

Submitter Information

Name: d d

General Comment

Wildfires California Air Resources Board (CARB) and the California Department of Public Health (CDPH), BEFORE A FIRE all state public land officials and local public health officials must prepare for smoke events, to take measures to protect the public, and communicate with the public about wildfire prevention . Where roads have narrowed over the years as vegetation and trees have encroached, even into ditches and onto shoulders, they should have cleared this vegetation away. where California allowed the natural landscape to grow higher, they should have removed the fire threat to create defensible space. They should have cleared dead and dying trees that have become hazards that can carry fire across large areas, or into areas that are a threat to values-at-risk, state management must move aggressively to minimize that threat. All land managers across the state fire Departments. burnable vegetation, must think about fire in a new and aggressive way. implementing such a strategy is carrying out activities that address vegetation composition and structure and also alters fuel loads to reduce hazards. Such methods of fuel treatment safeguard public and firefighter safety and protect our landscapes, scenic vistas, and natural and historic objects; our neighbors, nearby communities, and infrastructure; and our own administrative and visitor service assets and facility, think about a different way of managing public lands to better incorporate fuels management into your resource-management planning. appropriate reviews and identification of resource needs and data gaps. California should ensure fire management plans are up to date and include the identified needs for a robust fuels-management program to support wildfire prevention and suppression efforts to be

developed and implemented by both fire and other resource staff. Identify ways to address the realities we face in a safer and more effective manner. .....We simply cannot afford to continue business as usual. .....We must do everything we can to address the steady accumulation of fuels on our Nation's public lands and the resulting increased threats from catastrophic wildfires.

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Document: FEMA-2017-0032-DRAFT-0009
Unrelated Comment Submitted by Anonymous (f f)

Submitter Information

Name: f f

General Comment

Stop wildfires build more dams, Infrastructure for dams, Report , overall number of high-hazard potential dams is increasing, with the number climbing to nearly 15,500 in 2016. Due to the lack of investment, the number of deficient high-hazard potential dams has also climbed to an estimated 2,170 or more. Fema web site The purpose of a dam is to store water or other liquid-borne materials for any of several reasons, to include human water supply, irrigation, livestock water supply, energy generation, containment of mine tailings, recreation, pollution or flood control. Many dams fulfill a combination of the above functions. There are now approximately 28,000 dams in the U.S. whose failure could cause property damage or a potential loss of life. More than 15,000 of these are considered high-hazard potential, meaning their failure would result in probable loss of life. To reduce the chances of a dam failing .....invest in repair and routine maintenance. DAMS that are more than 25 feet high, hold more than 50 acre-feet of water, or are considered a significant hazard if they fail. The NID is maintained and published by the U.S. Army Corps of Engineers with information from all 50 states, Puerto Rico, and 16 Federal agencies. 700 dams it operates and maintains, . effective manner within a constrained budget said in report, According to one survey, the number of people who believed that "government is run by people who don't know what they're doing" climbed from 27 percent in the early 1960s to 63 percent in 1980. lack of confidence in government and concerns about the environment generated opposition to water projects. Another problem was the federal budget. Discretionary programs, such as water resources, became one way of showing fiscal restraint in

the face of demands for increased expenditures for other programs. Infrastructure development no longer automatically means large construction and maintenance operations. It means developing management techniques, new approaches, to use our resources more efficiently and to reduce resource depletion instead of building and maintaining. effective manner within a constrained budget

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Document: FEMA-2017-0032-DRAFT-0010
Unrelated Comment Submitted by Anonymous (h h)

Submitter Information

Name: h h

General Comment

California needs to pay a carbon tax on California Wildfire greenhouse gas GHG) which harm local communities and surrounding areas lakes, rivers, and ocean, and contribute to regional and global air pollution problems of smog, particulate matter, and toxics (such as benzene, a carcinogen). Wildfire gas contributes to climate change, because the primary constituent is methane, an especially powerful greenhouse gas (GHG), with climate impacts of carbon dioxide (CO2), measures to avoid wildfires may significantly benefit local communities, public health, and the environment. U.S. Environmental Protection Agency (EPA) issued rules in 2012 and early 2016 to control emissions of methane and volatile organic compounds (VOCs) to address safety, waste, production accountability, and/or air quality concerns. but failed in this rule to include Wildfires ..why ?? Need to expedited procedures for planning and conducting certain projects to reduce the risk of wildfires on certain federal lands managed by the Forest Service or the Bureau of Land Management (BLM). Limit some environmental assessment requirements and shorten administrative and judicial reviews Cut the underbrush in Federal and state lands. Repeal and replace the Wildland Fire Leadership Council (WFLC), National Strategy Committee (NSC) , Fire Executive Council (FEC) , National Cohesive Wildland Fire Management Strategy, Federal Land Assistance, Wildland Fire Implementation Plan (WFIP), Wildland Fire Situation Analysis, The Wildland Fire Situation Analysis process, Guidance for Implementation of Federal Wildland Fire Management Policy (2009), Land/Resource Management Plan (L/RMP), Management and Enhancement Act of 2009 (FLAME Act),

WFLC was established in April 2002 by the Secretaries of Agriculture and the Interior to provide an intergovernmental committee to support the implementation and coordination of Federal Fire Management Policy. In April 2010, the Secretaries of Interior, Agriculture and Homeland Security authorized the continuation of the WFLC. WHY IS CALIF. NOT A PART OF CROSS STATE EMISSIONS ACT ?? AND WHY ARE WILDFIRES NOT A PART OF GREENHOUSE GAS STANDARDS. TIME FOR CHANGE.

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Comment On: FEMA-2017-0032-0001
Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

Document: FEMA-2017-0032-DRAFT-0011
Unrelated Comment Submitted by Anonymous (t t)

Submitter Information

Name: t t

General Comment

Wildfires can pump as much carbon dioxide into the atmosphere in just a few weeks as cars do in those areas in an entire year, a study suggests. ....California Wildfire greenhouse gas GHG) which harm local communities and surrounding areas lakes, rivers, and ocean, and contribute to regional and global air pollution problems of smog, particulate matter, and toxics (such as benzene, a carcinogen). Wildfire gas contributes to climate change, because the primary constituent is methane, an especially powerful greenhouse gas (GHG), with climate impacts of carbon dioxide (CO2), measures to avoid wildfires may significantly benefit local communities, public health, and the environment. U.S. Environmental Protection Agency (EPA) issued rules in 2012 and early 2016 to control emissions of methane and volatile organic compounds (VOCs) to address safety, waste, production accountability, and/or air quality concerns. but failed in this rule to include Wildfires ..why ?? California Wild Fires.... MUST be in debate on greenhouse gas GHG, ozone, particle matters, MATT, clean air regulations, cross state emissions, Regional Haze Rule, carbon tax, and climate change, more than autos, more than industrial, more than oil and gas business. Wildfires are the biggest threat to ozone and humans and has most deaths Wildfire gaseous pollutants are precursors for ozone (O3) production. Millions of acres of forest and grassland have burned. Smoke is a complex mixture of carbon dioxide, water vapor, carbon monoxide, particulate matter, hydrocarbons and other organic chemicals, nitrogen oxides, and trace minerals. The individual compounds present in smoke number in the thousands. Particulate matter is the principal pollutant of concern from wildfire

smoke. these particles are within the fine particle PM2.5 fraction . EPA needs to conduct a study on the formation of atmospheric ozone describing the extent to which wildfire sources of air pollution affect the ability of states to comply with federal pollution limits under the Clean Air Act. NOTE Many states, including California have not yet decided whether or not to include wildfire emissions when setting greenhouse gas targets And why was California Not a part of Cross-State Air Pollution Rule (original CSAPR) on August 8, 2011? ... FLAWED GREENHOUSE GAS REGULATIONS ,

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Document: FEMA-2017-0032-DRAFT-0012
Unrelated Comment Submitted by Anonymous (t t)

Submitter Information

Name: t t

General Comment

California Wild Fires.... MUST be in debate on greenhouse gas GHG, ozone, particle matters, MATT, clean air regulations, cross state emissions, Regional Haze Rule, carbon tax, and climate change, more than autos, more than industrial, more than oil and gas business. Wildfires are the biggest threat to ozone and humans and has most deaths This week wildfire in North Calif has taken the lives of over 30 people so far, Smoke from wildfires is made up of a complex mixture of gases and fine particles produced when wood and other organic materials burn. The biggest health threat from smoke is from fine particles. These microscopic particles can get into your eyes and respiratory system, where they can cause health problems such as burning eyes, runny nose, and illnesses such as bronchitis. Fine particles also can aggravate chronic heart and lung diseases - and even are linked to premature deaths in people with these conditions. Wildfire gaseous pollutants are precursors for ozone (O3) production. Millions of acres of forest and grassland have burned. Smoke is a complex mixture of carbon dioxide, water vapor, carbon monoxide, particulate matter, hydrocarbons and other organic chemicals, nitrogen oxides, and trace minerals. The individual compounds present in smoke number in the thousands. Particulate matter is the principal pollutant of concern from wildfire smoke. these particles are within the fine particle PM2.5 fraction and can be inhaled into the deepest recesses of the lung and may represent a greater health concern than larger particles. Another pollutant of concern during smoke events is carbon monoxide, which is a colorless, odorless gas produced by incomplete combustion of wood or other organic materials. Carbon monoxide

levels are highest during the smoldering stages of a fire, especially in very close proximity to the fire. As the smoke moves downwind, it becomes more dilute and often more widespread, eventually reaching ground level into our lakes and rivers, and drinking water. Past practices of extinguishing every fire has not been followed, or cleaning brush and old growth, before the fires start, too much has been concerned with old growth impacts related to ecosystems, birds, and wildlife, instead of humans in the area, which are leading to larger, more intense, more frequent wildfires that threaten life, safety, and property. Wildfire smoke can result in significant air quality impacts to public health, particularly for at-risk groups, and impacts to safety and transportation through diminished visibility on roads and aviation corridors. Wildfire smoke also contains significant quantities of respiratory irritants, which can act in concert to produce eye and respiratory irritation and potentially exacerbate asthma. A tactical plan before fires outlining the critical steps with a cohesive wildland fire management strategy must be done, California should be charged a carbon tax on emission that impact the public health.

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Document: FEMA-2017-0032-DRAFT-0013
Unrelated Comment Submitted by Anonymous (y y)

Submitter Information

Name: y y

General Comment

The Regional Haze Rule, Wildfire gaseous pollutants are precursors for ozone (O3) production. Millions of acres of forest and grassland have burned in recent months. wildfires are producing tons of pollutions more than autos. oil and gas or factories . Currently requires states to submit state plans for compliance , mainly affect Western states (the rule aims to improve visibility in national parks, which are located primarily in Western states). EPA needs to conduct a study on the formation of atmospheric ozone describing the extent to which wildfire sources of air pollution affect the ability of states to comply with federal pollution limits under the Clean Air Act. the Moderate Resolution Imaging Spectroradiometer (MODIS) sensor. the burned surface can be mapped using a recently developed algorithm that uses multitemporal land surface reflectance data. MODIS is a satellite that monitors, among other factors land surface changes on the Earth's surface every 24 to 48 hours. It is usefully employed to estimate regional biomass burning emissions from grassland and woodland fires for a number of trace gases and particulates. Mercury emissions from forest fires (QHg) (in kg of mercury per year) can be estimated following a bottom-up approach by the equation: contribute substantial emissions of gases and particles to the atmosphere. These emissions can impact air quality and even climate. Daily emissions of particulate matter and numerous trace gases from fires mercury emissions from major natural sources and their variations with meteorological conditions is considered one of the major priority in estimating the relative contribution of major natural sources compared to industrial sources and ultimately to evaluate the mercury flux released to the

atmosphere on regional and global scale. estimate the contribution of wildfires to the total mercury released to the atmosphere, An accurate estimate of carbon fluxes associated with tropical deforestation from the last two decades is needed to balance the global carbon budget.

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Document: FEMA-2017-0032-DRAFT-0014
Unrelated Comment Submitted by Anonymous (r r)

Submitter Information

Name: r r

General Comment

Greenhouse Gas (GHG) from WILDFIRES IN FORESTS AND PUBLIC LANDS in California must be part of the Clean air or clean water standards... of which EPA left out... ... Flawed climate change and carbon tax has left out the Co2 from major causes. .. AND STOP BLAMING OIL AND GAS AND AMERICA BUSINESS ON GREENHOUSE GAS...Wildfire gaseous pollutants are precursors for ozone (O3) production. Millions of acres of forest and grassland have burned in recent months. Past agencies HAVE NOT prepared a tactical plan outlining the critical steps with a cohesive wildland fire management strategy that addresses these issues before a fire...and required wildfires in California to limit NOx emissions to reduce ozone, and to limit annual NOx and SO2 emissions to reduce fine particle pollution.. The federal government and California, Washington and Oregon, are spending BILLIONS OF TAX PAYER DOLLARS, ... in attempting to address our nation's wildland fire problems. BUT The wildland fire problems facing our nation continue to grow. GREENHOUSE GAS from wildfires is producing tons of pollutions to TAX PAYERS.... The number of acres burned by wildland fires annually from 2000 to 2005 was 70 percent greater than the average burned annually during the 1990s, while appropriations for the federal government's wildland fire management activities tripled from about $1 billion in fiscal year 1999 to nearly $3 billion in fiscal year 2005. Experts believe that catastrophic damage from wildland fire probably will continue to increase until an adequate long-term federal response, coordinated with others, is implemented.

ISSUE New research with New recommendations from agencies to develop a cohesive strategy that identifies the available long-term options for REDUCING EXCESS VEGETATION ON PUBLIC LAND THAT FUEL WILDFIRES and reducing excess vegetation that could FUEL WILDLAND FIRES . The last report Protecting People and Natural Resources: A Cohesive Fuels Treatment Strategy," this document DOES NOT identify long-term options to REDUCE EXCESS VEGETATION AND FUELS ON PUBLIC LANDS. CONSIDER requiring the Secretaries of Agriculture and the Interior to develop a tactical plan outlining the key steps and time frames required to complete this cohesive strategy. If the agencies and the Congress are to make informed decisions about an effective and affordable long-term approach to the issue, they should have a cohesive strategy that identifies long-term options and needed funding for addressing these wildland fire problems BEFORE THEY HAPPEN. New scientific knowledge of how to reduce the fuels and vegetation on the public lands is required and less of biological and sociological factors.

FIRST Government should CANCEL ....WORK RELATIONSHIP WITH ; Wildland Fire Leadership Council (WFLC), National Strategy Committee (NSC) , Fire Executive Council (FEC) , National Cohesive Wildland Fire Management Strategy, Federal Land Assistance, Wildland Fire Implementation Plan (WFIP), Wildland Fire Situation Analysis, The Wildland Fire Situation Analysis process, Guidance for Implementation of Federal Wildland Fire Management Policy (2009), Land/Resource Management Plan (L/RMP), Management and Enhancement Act of 2009 (FLAME Act), WFLC was established in April 2002 by the Secretaries of Agriculture and the Interior to provide an intergovernmental committee to support the implementation and coordination of Federal Fire Management Policy. In April 2010, the Secretaries of Interior, Agriculture and Homeland Security authorized the continuation of the WFLC. Involved Agencies: U.S. Department of the Interior, U.S. Department of Agriculture, Forest Service, National Park Service, Fish and Wildlife Service, Bureau of Land Management, Bureau of Indian Affairs, U.S. Geological Survey, U.S. Department of Homeland Security/U.S. Fire Administration, Western Governors' Association, National Governors' Association, National Association of Counties, Intertribal Timber Council, National League of Cities, National Association of State Foresters, International Association of Fire Chiefs. On February 13, 2009, the Fire Executive Council (FEC) approved Guidance for the Implementation of Federal Wildland Fire Management Policy. This Guidance provides for consistent implementation of the 1995/2001 Federal Fire Policy, as directed by the Wildland Fire Leadership Council.

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Document: FEMA-2017-0032-DRAFT-0015
Unrelated Comment Submitted by Anonymous (r r)

Submitter Information

Name: r r

General Comment

California Fires and Cross-State Air Pollution Rule, Wildfires can pump as much carbon dioxide into the atmosphere in just a few weeks as cars do in those areas in an entire year, a study suggests. .... flawed EPA science used a two-step process to set limits on upwind states' emissions. First, EPA determined whether a state's emissions were projected to contribute significantly to air quality problems in a downwind area (making it hard for a downwind area to attain or stay in attainment with ambient air quality standards). Second, EPA determined the amount of emission reductions that in upwind states could make without exceeding a cost threshold. But EPA only used Power Plants, and autos, and Not Wildfire air quality problems.. Wildfires should be required to limit NOx emissions to reduce ozone, and to limit annual NOx and SO2 emissions to reduce fine particle pollution. Federal agencies having primary responsibility for managing wildland fire issues--the Forest Service within the Department of Agriculture and the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), Fish and Wildlife Service (FWS), and National Park Service (NPS) within the Department of the InteriorRECOMMEND that the Dept. of Interior and Secretaries of Agriculture and complete a joint tactical plan outlining the critical steps before a Fires, for a NEW cohesive strategy like underbrush treatments, including tree thinning and prescribed burning to reduce the risk of high-severity fire. Underbrush treatments have multiple benefits for forests in addition to reduction of hazardous fuels, including higher understory biodiversity and a more heterogeneous habitat mosaic... study should also demonstrates the far-reaching impact of

ozone production from the fires. Wildfires are a significant direct source of atmospheric pollutants ... In responding to A NEW report, officials from Agriculture and Interior can produce an initial tactical plan. Agencies must complete prior to implementing such a strategy, including finishing data systems needed to identify the extent, severity, and location of wildland fire threats to the nation's communities and ecosystems; updating local fire management plans to better specify the actions needed to effectively address these threats; and assessing the cost-effectiveness and affordability of options for reducing fuels in the Forest and State and Federal Lands. Executive Order 13045: Protection of Children From Environmental Health and Safety Risks

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Document: FEMA-2017-0032-DRAFT-0016
Unrelated Comment Submitted by Anonymous (y y)

Submitter Information

Name: y y

General Comment

California Air pollution from Wildfires affects air quality in state and downwind states. In 2017 approx. 47,700 wildfires have burned millions acres across the country, with the majority of the devastation in the states of California , High-profile fires in California have caught national headlines, millions of acres of forest and grassland have burned in recent months. California public lands management needs aggressive fuels reduction management to save lives, homes, and wildlife habitat, lakes and streams , and stop polluting co2 greenhouse GAS in ozone. It is well settled that the steady accumulation and thickening of vegetation in areas that have historically burned at frequent intervals exacerbates fuel conditions and often leads to larger and higher-intensity fires," Office of Wildland Fire, said, "It is critical to fully consider the benefits of fuels reduction in the everyday management activities that we carry out for our public land management objectives, , California needs to focused on actively managing and addressing the on-the-ground conditions, they can no longer delay the implementation of this important work." reduce the fuel loads in our forests and rangelands avert the devastation caused by the wildfires. turn unhealthy, overgrown, and infested forests into thriving, healthy ecosystems help the Groundwater-Quality Conditions, help the air, has nothing to do with globe warming, only management of forests from damaging particles that end up in air and water of other states. NOTE Many states, including California have not yet decided whether or not to include wildfire emissions when setting greenhouse gas targets And why was California Not a part of Cross-State Air Pollution Rule (original CSAPR) on August 8, 2011? ... FLAWED GREENHOUSE

GAS REGULATIONS , Wildfires can pump as much carbon dioxide into the atmosphere in just a few weeks as cars do in those areas in an entire year, a study suggests. ....

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Document: FEMA-2017-0032-DRAFT-0017
Unrelated Comment Submitted by Anonymous (T T)

Submitter Information

Name: T T

General Comment

California people need to cut old growth in forest and fields, the Smoke Exposure at Western Wildfires 2000 study ,by United States Department of Agriculture Forest Service Pacific Northwest Research Station project measured smoke exposure among wildland firefighters in the Western United States between 1992 and 1995. Smoke from wildland fires is composed of hundreds of chemicals in gaseous, liquid, and solid forms. The chief inhalation hazards seem to be carbon monoxide (CO), aldehydes, respirable particulate matter with a median diameter of 3.5 micrometers (PM3.5), and total suspended particulate (TSP). Many low- to middle-molecular weight aldehydes are present in smoke, but formaldehyde and acrolein have been the most studied. Benzene (C6H6) is present in wildland fire smoke, but earlier work In a situation such as firefighting, where workers face multiple air pollutants, it is prudent to consider the combined effects of the pollutants. Acrolein, formaldehyde, and respirable particulate all cause irritant effects in the same organs: the respiratory tract and mucous membranes. Beyond the physical irritation caused by fine particles, chemical analyses of woods moke particulate have shown it to be composed of many organic compounds, some of which are chemical irritants. Without detailed knowledge of the chemical composition of the particulate, it is reasonable to assume that exposure to PM3.5 and the aldehydes produces an additive irritant effect in the respiratory. tract and mucous membranes of the eyes, nose, and throat. The objectives of the study were to assess firefighter
exposure to air pollutants in smoke at wildland fires in the Western United States, Breathing-

zone measurements of acrolein, benzene, carbon dioxide (CO2), carbon monoxide (CO), formaldehyde, and particulate matter (total and respirable) were obtained concurrently during active firefighting by using personal sampling pumps and sampling media worn by the firefighters. Electrochemical dosimeters also were used to measure CO, thereby providing the advantage of continuous exposure records. Over 1,750 separate measurements of pollutant exposure were collected and analyzed by the project laboratory of the U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. Smoke exposure measurements were made at 13 wildfires in California. And California, Idaho, Montana, and Washington, CO was shown exceed full-shift permissible exposure limits (PELs), as established by the Occupational Safety and Health Administration (OSHA),

About 3 percent of the firefighters' exposures exceeded the adjusted OSHA PEL for CO at project wildfires. About 3 percent of the shift-average respiratory irritant exposures and about 5 percent of the CO exposures at project wildfires exceeded the recommended ACGIH Threshold Limit Values.

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Document: FEMA-2017-0032-DRAFT-0018
Unrelated Comment Submitted by Anonymous (r r)

Submitter Information

Name: r r

General Comment

Sounds like Wildfires are most likely cause bad air and water, not oil and gas . so why EPA and BLM not doing rule making over 8 years ON WILDFIRES IN Calif, or Washington, or Oregon ?? see study by...Washington Department of Health; California Office of Environmental Health Hazard Assessment, U.S. Environmental Protection Agency; in 2001 , Smoke rolls into town, blanketing the city, turning on streetlights, creating an eerie and choking fog. Smoke is composed primarily of CARBON DIOXIDE, water vapor, CARBON MONOXIDE, PARTICULATE MATER, hydrocarbons and other organic CHEMICALS, nitrogen oxides, trace MINERALS and several thousand other compounds. The actual composition of smoke depends on the fuel type, the temperature of the fire, and the wind conditions. Particulate matter is the... principal pollutant .....of concern from WILDFIRE smoke for the relatively short-term exposures (hours to weeks) typically experienced. Moreover, such small particles can be inhaled into the deepest recesses of the lung and are thought to represent a greater health concern than larger particles. Another pollutant of concern during smoke events is CARBON MONONXIDE. Carbon monoxide levels are highest during the smoldering stages of a fire. Other air pollutants, such as acrolein, BENZENE, and formaldehyde, are present in SMOKE. The effects of smoke range from eye and respiratory tract irritation to more serious disorders, including reduced lung function, bronchitis, exacerbation of asthma, and premature death. carbon monoxide exposure can cause headaches, dizziness, visual impairment, reduced work capacity, and reduced manual dexterity, even in otherwise healthy individuals. Wildfire smoke

also contains significant quantities of respiratory irritants. Formaldehyde and acrolein are two of the principal irritant chemicals that add to the cumulative irritant properties of smoke, The major carcinogenic components of smoke are polycyclic aromatic hydrocarbons (PAHs). Although the carcinogens benzene and formaldehyde are also present in smoke. Individuals with chronic obstructive pulmonary disease (COPD), which is generally considered to encompass emphysema and chronic bronchitis, may also experience a worsening of their conditions because of exposure to wildfire smoke. where fires are likely to occur, state and local public health agencies should consider CUTING THE UNDERGROWTH, CLEANING THE FOREST OF DEAD TREES, NOTE wildfire smoke and EPA and BLM , forest service, fema, should adequately do work in wild areas to stop health risks and more precautions in fighting problem . Need to get the collaborative effort by scientists, air quality specialists and public health professionals from Federal, state and local agencies back to the real world of where co2 is really coming from. And stop blaming the hard working men and women to make a living in the oil and gas industry .

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Document: FEMA-2017-0032-DRAFT-0019
Unrelated Comment Submitted by Anonymous (V V)

Submitter Information

Name: V V

General Comment

WIND-POWER TURBINES ARE BAD FOR FARMERS...AND FOREST ..by threatening.... populations of insectivorous bats in North America. Bats are voracious predators of nocturnal insects, including many ....crop and forest pests. .... There are no continental-scale monitoring programs for assessing wildlife fatalities at wind turbines, so the number of bats killed across the entire United States is difficult to assess. By 2020 an estimated 33,000 to 111,000 bats will be KILLED ANNUALLY by wind turbines in the Mid-Atlantic Highlands alone . Mortality from factors is substantial and will likely have long-term cumulative impacts on both aquatic and terrestrial ecosystems. the economic consequences of losing so many bats could be substantial.
Loss of bats .... could lead to... agricultural losses ...estimated at more than the value of bats may be as low as... $3.7 billion/year and as high as $53 billion/year..... These estimates include the... reduced costs of PESTICIDE applications that are not needed to suppress the insects consumed by bats . Save More Money by helping with impacts of PESTICIDES on ecosystems,... which can be substantial ,... or other secondary effects of predation, such as ,,,reducing the potential for evolved resistance of insects to PESTICIDS ,,,and genetically modified crops,,,,,, , bats can exert top down suppression of forest insects. For example, a single colony of 150 big brown bats (Eptesicus fuscus) in Indiana has been estimated to eat nearly 1.3 million pest insects each year, possibly contributing to the disruption of population cycles of agricultural pests . Other estimates suggest that a single little brown bat can consume 4 to 8 g of

insects each night during the active season. published estimates of the value of pest suppression services provided by bats ranges from about $12 to $173/acre (with a most likely scenario of $74/acre) in a cotton-dominated agricultural landscape in south-central Texas. The value of bats to the agriculture industry is estimated nearly $23 billion per year, but may range from $3.7 billion to $53 billion a year. Brazilian free-tailed bats (Tadarida brasiliensis) form enormous summer breeding colonies, mostly in caves and under bridges, in south-central Texas and northern Mexico. Their prey includes several species of adult insects whose larvae are known to be important agricultural pests, including the corn earworm or cotton bollworm (Helicoverpa zea). We estimate the bats' value as pest control for cotton production in an eight-county region in south-central Texas. Our calculations show an annual value of $741 000 per year, with a range of $121 000-$1 725 000, compared to a $4.6-$6.4 million per year annual cotton harvest. Bats feed on some of the most damaging crop pests - including the moths of cutworms and armyworms - which helps to protect food crops naturally. Farmers appreciate the pest control provided by bats and many look forward to having bats return to their farms each year,
Urgent efforts are needed to educate the public and policy-makers about the ecological and economic importance of insectivorous bats and to provide practical conservation solutions.
North America are under severe pressure from major new threat. bats of several migratory tree-dwelling species are being killed in unprecedented numbers at wind turbines across the continent . Why these species are particularly susceptible to wind turbines remains a mystery, and several types of attraction have been hypothesized .
Wind is Not clean If it removes important Bat that helps the environment with lower use of PESTICIDES, and cost to farmers are too great for use windmills that generating occur less than 30% of the time. There is NO market for electricity that cannot be delivered on demand. The "demand" that exists is nothing more than legislated policy artifice - in the absence of mandated fines, penalties and/or endless subsidies the wind industry would have never got going at all. Endless streams of massive subsidies for a meaningless power source fits the "unsustainable" . taking billions from farmers to produce to give to wind farms is a waste money and totally nonsense.

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Document: FEMA-2017-0032-DRAFT-0020
Unrelated Comment Submitted by Anonymous (v v)

Submitter Information

Name: v v

General Comment

Stop environmentalist activist against Forest Service and States from doing their jobs correctly, Wildfires are bad for ozone layer, cause of PM3.5 , TSP , CO, emissions , Smoke is composed primarily of CARBON DIOXIDE, water vapor, CARBON MONOXIDE, PARTICULATE MATER, hydrocarbons and other organic CHEMICALS, nitrogen oxides, trace MINERALS and several thousand other compounds Change fire suppression regulations wrong need pre-cutting, clearing and build more dams.....California leaders should establish a program to cut old growth in forest and fields, wildfires bad for wildlife, bad for farmers, billions of damage ,bad for Ozone, build more dams , the Smoke Exposure at Western Wildfires 2000 study by United States Department of Agriculture Forest Service Pacific Northwest Research Station project measured smoke exposure among wildland firefighters in the Western United States between 1992 and 1995. Smoke from wildland fires is composed of hundreds of chemicals in gaseous, liquid, and solid forms. The chief inhalation hazards seem to be carbon monoxide (CO), aldehydes, respirable particulate matter with a median diameter of 3.5 micrometers (PM3.5), and total suspended particulate (TSP). Many low- to middle-molecular weight aldehydes are present in smoke, but formaldehyde and acrolein have been the most studied. Benzene (C6H6) is present in wildland fire smoke, but earlier work In a situation such as firefighting, where workers face multiple air pollutants, it is prudent to consider the combined effects of the pollutants. Acrolein, formaldehyde, and respirable particulate all cause irritant effects in the same organs: the respiratory tract and mucous membranes. Beyond the

physical irritation caused by fine particles, chemical analyses of woods moke particulate have shown it to be composed of many organic compounds, some of which are chemical irritants. Without detailed knowledge of the chemical composition of the particulate, it is reasonable to assume that exposure to PM3.5 and the aldehydes produces an additive irritant effect in the respiratory. tract and mucous membranes of the eyes, nose, and throat. consequences of wildfire smoke exposure on respiratory health in children PM10 concentrations ranged from 104 to 252 g/m3 in the affected communities, which was about 3 to 8 times the long-term averages for these regions. BLM and EPA, why are these states not removing the old trees, and outgrowth to fight the co2 going over the western states?? ..... Wildfires devastating effects on community drinking water supply In recent decades, of fuel load accumulation. wildfire for many downstream water concerning, safe drinking water.decades of fire suppression, contributing to increase wildfire . The accumulation of forest fire fuels has been an consequence of aggressive fire suppression policies, creating conditions in extreme wildfire . have contributed to increasing wildfires. Wildfires liberate accumulated heavy metals, possibly in alarmingly high pulses, to the atmosphere.
University study WILDFIRES... epidemiologic investigations have suggested that increases in irritative symptoms, self-reported respiratory problems, emergency department visits for asthma and chronic obstructive pulmonary disease (COPD), and hospitalizations for asthma, COPD and Ischemic Heart Disease (IHD) can be observed in communities exposed to elevated levels of particulate matter from forest fires.
exposure to air pollutants in smoke at wildland fires in the Western United States, Breathing-zone measurements of acrolein, benzene, carbon dioxide (CO2), carbon monoxide (CO), formaldehyde, and particulate matter (total and respirable) were obtained concurrently during active firefighting by using personal sampling pumps and sampling media worn by the firefighters. Electrochemical dosimeters also were used to measure CO, thereby providing the advantage of continuous exposure records. Over 1,750 separate measurements of pollutant exposure were collected and analyzed by the project laboratory of the U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. Smoke exposure measurements were made at 13 wildfires in California. And California, Idaho, Montana, and Washington, CO was shown exceed full-shift permissible exposure limits (PELs), as established by the Occupational Safety and Health Administration (OSHA),

About 3 percent of the firefighters' exposures exceeded the adjusted OSHA PEL for CO at project wildfires. About 3 percent of the shift-average respiratory irritant exposures and about 5 percent of the CO exposures at project wildfires exceeded the recommended ACGIH Threshold Limit Values.

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Comment On: FEMA-2017-0032-0001
Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

Document: FEMA-2017-0032-DRAFT-0021
Unrelated Comment Submitted by Anonymous (r r)

Submitter Information

Name: r r

General Comment

... Forest fires may produce as much co2 as half of all fossil-fuels burned", Wildfires can produce more greenhouse gas (GHG) emissions , newspaper report, 2007 said California wildfires pumped nearly 8 million metric tons of climate-warming carbon dioxide into the atmosphere , Another report from Scientists study estimated that Fires in US release millions metric tons of carbon dioxide per year. air pollution affects air quality in downwind states. In 2017 approx. 47,700 wildfires have burned 8 million acres across the country, with the majority of the devastation in the states of California and Montana. High-profile fires in Yosemite and Glacier National Parks have caught national headlines, however millions of acres of forest and grassland have burned in recent months. aggressive and scientific fuels reduction management to save lives, homes, and wildlife habitat, lakes and streams , and stop polluting co2 in ozone It is well settled that the steady accumulation and thickening of vegetation in areas that have historically burned at frequent intervals exacerbates fuel conditions and often leads to larger and higher-intensity fires," Office of Wildland Fire, said, "It is critical to fully consider the benefits of fuels reduction in the everyday management activities that we carry out for our public land management objectives, , California needs to focused on actively managing and addressing the on-the-ground conditions, they can no longer delay the implementation of this important work." reduce the fuel loads in our forests and rangelands avert the devastation caused by the wildfires. turn unhealthy, overgrown, and infested forests into thriving, healthy ecosystems help the Groundwater-Quality Conditions, help the air, has nothing to do with globe warming, only

management of forests from damaging particles that end up in air and water of other states. why did the past administration not count wild fires in ozone rules, should resend all mining and gas and oil rules and regulations. and California needs to pay a ozone emission tax on wildfires.

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Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

Document: FEMA-2017-0032-DRAFT-0022
Unrelated Comment Submitted by Anonymous (v e)

Submitter Information

Name: v e

General Comment

Impact of California wildfires on the atmosphere is out of control , thousands of tons of greenhouse gas emissions and other harmful air pollutants, why does California continue to blame other sources of emissions, and why did the past administration report not include Co2 from wildfires in ozone emissions?? Wildfires produce more greenhouse gas (GHG) pollutants than hundreds of thousand of cars or gas and oil or mining operations. Wildfires particles pollute our lakes and rivers and prevent clean waters. Agencies need to re think the emissions standards sources.A lack of active management has left our forests overly dense and stocked with dead and dying trees that feed catastrophic wildfires, Inability of the Forest Service to thin forests due to overly cumbersome and lengthy environmental activist processes, increasing frivolous lawsuits filed by certain litigious environmental activist , and a lack of sufficient agency focus on this challenge has led to millions acres with millions of dead trees and bushes. that are at high risk of deadly and catastrophic forest fires that endanger communities, hurt local economies, destroy land and water quality and release massive amounts of emissions into the atmosphere. Environmental litigation that has bogged down thinning projects for nearly two decades. Enough is enough. NEED federal review on the impact of wildfires on carbon dioxide and other greenhouse gases, as well as the threat to habitat, water quality and property destruction. We can do things about forest management that make sense so we can diminish forest fires for the future, As management decreases, forest health deteriorates and fires grow in size, density and cost. How many more thousands of acres through the West must burn before

we act? Need to figure out ways to clear the dense thicket of litigation and regulation that has for years stalled projects aimed at cutting back the federal forests, many plagued with diseased and dying trees. A lack of active management has left our forests overly dense and stocked with dead and dying trees that feed catastrophic wildfires, As management decreases, forest health deteriorates and fires grow in size, density and cost. The reignited debate comes as the Forest Service, which falls under the Agriculture Department, has watched its firefighting expenses soar, jumping from 15 to 55 percent of the budget and forcing cutbacks in areas such as facility maintenance and recreation. we can affect how we manage these forests to reduce the impact of forest fire. Nearly 8 million acres have burned so far in 2017, making this a worse-than-average wildfire year despite the wet winter and spring. A rash of wildfires include, the biggest blaze in Los Angeles history in terms of acreage.

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Unrelated Comment Submitted by Anonymous (r r)

Submitter Information

Name: r r

General Comment

California catastrophic wildfire on forests directly and negatively impact lives and property and long and short term health effects of greenhouse gas over many states, which can hang in air for months, then end up in our waters ,lakes , and rivers causing additional harm. Wildfires can pump as much carbon dioxide into the atmosphere in just a few weeks as cars do in those areas in an entire year, a study suggests . Smoke is a complex mixture of carbon dioxide, water vapor, carbon monoxide, particulate matter, hydrocarbons and other organic chemicals, nitrogen oxides, and trace minerals. The individual compounds present in smoke number in the thousands. Particulate matter is the principal pollutant of concern from wildfire smoke. these particles are within the fine particle PM2.5 fraction and can be inhaled into the deepest recesses of the lung and may represent a greater health concern than larger particles. Another pollutant of concern during smoke events is carbon monoxide, which is a colorless, odorless gas produced by incomplete combustion of wood or other organic materials. ... Flawed climate change and carbon tax has left out the Co2 from wildfires which is major causes to earth Ozone, not gas and oil industry, or mining, or factories .. Wildfire gaseous pollutants are precursors for ozone (O3) production.
Improvement of forest health and ecological functions are vital to maintain watersheds and fish and wildlife habitat on lands that may be subject to wildfires, we live with the consequences of our in actions. Agencies need to review or change or appeal forest rules that are subject to NEPA and ESA and other federal regulations. Agency need to review update or repeal The law

guiding Federal, State Forest , BIA and tribal management of forests. Need to update or repeal the Equal Access to Justice Act (EAJA) of 1980 , subsection of EAJA, codified at 28 U.S.C. 2412(d) section 2412(b). The National Indian Forest Resource Management Act of 1990 (PL 101-630, Title III), is the most recent for greater federal forest management and, The Indian Self-Determination Act (PL 93-638). supports the "Resilient Federal Forests Act" (H.R.2936), more to reduce the threat of wildfire. Section 701 of H.R. 2936 improves the Tribal Forest Protection Act (TFPA). The TFPA, authorized by Congress 13 years ago, authorized the Forest Service and BLM to enter into agreements or contracts with tribes to address risks and threats originating on nearby Forest Service and BLM administered lands. the TFPA has not met expectations on the ground. Since 2004, only a handful of TFPA projects have been effectively implemented on Forest Service lands. One project proposed by the Tule River Tribe took over ten years to navigate the Forest Service's environmental review process. providing timelines for review, approval and implementation of old growth projects on federal land. litigious environmental activist , and a lack of sufficient agency focus on this challenge has led to million acres in California to get out of control. These areas of let it burn policy of past administration is high risk of deadly and catastrophic forest fires that endanger communities, hurt local economies, destroy land and water quality and release massive amounts of emissions into the atmosphere. the causes of catastrophic wildfire are complex of old trees, dead bushes, etc, the status quo of inaction has exacerbated present forest conditions, which now present a great risk to both communities and the environment. Stop the environmental activist that are preventing forest service and BLM from doing their jobs.

Direct and comprehensive management of our forests must be revised. Must understand that a "let it burn" approach is not acceptable given the forest health conditions found across our nation's landscape. Instead we are need effectively responding to and reversing unnatural conditions in the forest, also respond to fires more effectively before they start by cleaning old growth allowing more timber sales. If forests are devastated by wildfire, we lose revenue and jobs, a myriad of ecological benefits we rely upon from our forests, and the traditional and cultural sustenance our forests have provided since time immemorial. Wild Fires create a toxic health risk to humans and wildlife. While the comparison is not completely equivalent, the average size of a fire on BIA-managed lands is one-third the size of fires on Forest Service land. Fire fuels in forest need weekly or monthly inspection team to respond to old growth to stop fires from damaging economic value and rehabilitate landscapes. Fires once start can come at a devastating financial and ecological cost. Rehabilitation costs are generally equal to the suppression cost, but can be as much as three times higher. We can help move the country forward to create a healthier, sustainable future for our forests and natural resources.

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Unrelated Comment Submitted by Anonymous (e e)

Submitter Information

Name: e e

General Comment

California Environmental activist need to allow Forest service, BLM, and other agencies to do their job in fighting wildfire in the grass lands and forest by management of old growth, removing fallen trees, timber sales, cutting of bushes. Idea to encourage the state , do a California wildfire greenhouse rulemaking to reduce the interstate transport of wildfire emissions fine particulate matter (PM2.5) NAAQS . To protect public health and welfare of neighbor states by reducing interstate emission transport that significantly contributes to nonattainment, or interferes with maintenance, of the 2008 ozone NAAQS in the western U.S. Wildfire greenhouse gas causes a variety of negative effects on human health, vegetation, and ecosystems. In humans, acute and chronic exposure to ozone is associated with premature mortality and a number of morbidity effects, such as asthma exacerbation. Wildfire Ozone exposure can also negatively impact ecosystems, for example, by limiting tree growth. Studies have established that ozone occurs on a regional scale (i.e., hundreds of miles) over much of the California with elevated concentrations occurring in rural as well as metropolitan areas. To reduce this regional-scale ozone transport, assessments of ozone control approaches have concluded that NOX control strategies are effective. Further, studies have found that EGU NOX wildfire emission reductions can be effective in reducing ozone pollution. Rule would require California to prohibit emissions from wildfires that will contribute significantly to nonattainment or interfere with maintenance in any other state with respect to any primary or secondary wildfire greenhouse gas. With the primary responsibility to address interstate

emission transport through the development of good neighbor State Implementation Plans (SIPs).

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Document: FEMA-2017-0032-DRAFT-0025
Unrelated Comment Submitted by Anonymous (e e)

Submitter Information

Name: e e

General Comment

Wildfires in calif must stop.... over Billion dollars in tax payer COST ,bad for budge, bad for wildlife, lives lost, time to tend your garden... Investigate and review policy of Environmentalist activists which seem to be causing more harm then good. REPORT 2007 said California wildfires pumped nearly 8 million metric tons of climate-warming carbon dioxide into the atmosphere; 2017 fire worse..... REPORT: from Scientists study estimated that Fires in US release millions metric tons of carbon dioxide per year; REPORT "Forest fires may produce as much co2 as half of all fossil-fuels burned . We have a clear and present danger of high-intensity fires on public lands in California , fuels buildup to unnatural levels ... Misguided Obama policy Suppress of Wildfire and Unwise ideas of environmentalist give too much power where environmental analyses were 60% of the costs .Manage forest BEFORE they start...OCT 2017 The Wildfire Prevention and Mitigation Act of 2017 will simplify forest management to help prevent & mitigate wildfires and protect wildlife by greatest threat to many endangered species and their habitat is catastrophic WILDFIRE ,leads to susceptible to insects and disease outbreaks ...MUST do thinning forest to protect habitat and more resistant to insect predation. concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, potential for catastrophic fire.....2017 Mr Secretary Zinke accumulation and thickening of vegetation exacerbates fuel conditions and often leads to larger and higher-intensity fires,".. ... We Do Not Have A Fire Problem On Our Nation's Forests; We Have A Land Management Problem" Agencies need to review or change or appeal forest rules that are subject to NEPA and ESA and

other federal regulations. Agency need to review update or repeal The law guiding Federal, State Forest , BIA and tribal management of forests. Need to update or repeal the Equal Access to Justice Act (EAJA) of 1980 , subsection of EAJA, codified at 28 U.S.C. 2412(d) section 2412(b).
Wildfire Ozone regulations compliance costs could measure in the trillions of dollars for california.
inability of the Forest Service to thin forests due to overly cumbersome and lengthy environmental processes, increasing frivolous lawsuits filed by certain litigious environmental groups, and a lack of sufficient agency focus on this challenge has led to nearly 60 million acres that are at high risk of deadly and catastrophic forest fires that endanger communities, hurt local economies, destroy land and water quality and release massive amounts of emissions into the atmosphere. Why did the past admin. leave out wildfires in the studies of harmful Emissions??

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Document: FEMA-2017-0032-DRAFT-0026
Unrelated Comment Submitted by Anonymous (e e)

Submitter Information

Name: e e

General Comment

Protect our Homes, Children , Wildlife, Crops, Water, Ecosystems and Forest from Wildfires, we can do more, much more to prevent wildfires before they start. Need to update or repeal the Equal Access to Justice Act (EAJA) of 1980 , subsection of EAJA, codified at 28 U.S.C. 2412 (d) section 2412(b). Wildfire Carbons and Ozone Greenhouse gas coming from WILDFIRES destroy life , too many rules against America energy and no rules against states that do not do enough with wildfire prevention ...Extreme events of wildfires have significant impacts on Crops, and on air quality especially when they occur during periods conducive to ozone formation, Findings demonstrate a clear impact of wildfires on surface O3 nearby and potentially far downwind from the fire location, Wildfires were not in in the Flawed past administration EPA report for Greenhouse gas. US Forest Service page, 2015 Pacific Northwest wildfire season Washington 130,000 tons Oregon 90,000 tons of fine particulate matter . July 2016, EPA's 2013 guidance did not completely provide sufficient guidance to states to fulfill their oversight responsibilities. The greenhouse gas emissions alone were equivalent to more than 8.5 million passenger vehicles driven for a year or heating 3.7 million homes. Also see Cato institute web page at cato.org/publications/policy-analysis/case-against-us-carbon-tax ... Executive order, Roll Back Burdensome Regulations and Executive Order (EO) 13771, "Reducing Regulation . these are not only Burdensome and costly but based on flawed Science. Forest service needs Americas help to stop environmentalist activist from lawsuits and fighting our forest service from doing a job that protects the people, the forest, the wildlife . Disasters

from wildfires hurt health of all living things. should do more to cut and sell more timber, remove old dead trees, change the endanger species act to stop law suits against our forest service. It is well settled that the steady accumulation and thickening of vegetation in areas that have historically burned at frequent intervals exacerbates fuel conditions and often leads to larger and higher-intensity fires," said Secretary Zinke. "These fires are more damaging, more costly, and threaten the safety and security of both the public and firefighters.
California wildfires pump millions metric tons of climate-warming carbon dioxide into the atmosphere over many states, Wildfire smoke can result in significant air quality impacts to public health.
Review the fire protection regulations were primarily established with the issuance of Appendix R to 10 CFR part 50 in 1980 and the NFPA [National Fire Protection Association] 805 alternative regulations adopted in 2004." final rule in 1980 that issued appendix R to part 50 of title 10 of the Code of Federal Regulations (10 CFR) and revised 10 CFR 50.48 (45 FR 76602; November 19, 1980). The 2004 final rule (69 FR 33536; June 6, 2004) further revised 10 CFR 50.48 and added alternative fire protection

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Agency Information Collection Activities: Proposed Collection; Comment Request; National Fire Academy Long-Term Evaluation Form for Supervisors and National Fire Academy Long-Term Evaluation Form for Students/Trainees

Document: FEMA-2017-0032-DRAFT-0034
Unrelated Comment Submitted by Anonymous (x x)

Submitter Information

Name: x x

General Comment

A bible verse for rule makers : Be strong and of a good courage; be not afraid, , for the Lord thy God is with thee ; knowing you are doing God's work by lifting the burdens past regulations that is hurting Gods Children and poor in American, who thank you against the past false regulators.
Stop the lumber imports, Job losses in forestry and related economic sectors in the millions, or nearly 9 percent of all related unemployment during the past administration. Further fallout came with the temporary and permanent closure of nearly 1,000 wood-processing mills. Net imports to the United States increased from 1.0 billion ft3 in 1965 to 4.2 billion ft3 in 2005. the U.S. forest products industry employed about 1 million workers and accounts for approximately 6 percent of the total U.S. manufacturing gross domestic product, or GDP, placing it roughly on par with the automotive and plastics industry. The forest products industry was among the top 10 manufacturing sector employers in 48 States and generates more than $200 billion a year in sales and about $54 billion in annual payroll. Today, Globalization of manufacturing contributed to a decline in U.S. pulp, paper, and paperboard output and American timber jobs Since the early 1990s, roundwood harvest for export has declined, and roundwood equivalent of imports has increased. Domestic roundwood harvest increased from 1950 through the mid-1980s, peaking at 15.6 billion cubic feet (ft3) in 1989, and roundwood harvest declined to 10.5 billion ft3 by 2009. In 2009, lumber production hit the lowest level since 1981 at 5.1 billion ft3 (30 billion board foot equivalent). This level has not been a normal production level since the

1950s. pulpwood production. had declined sharply in the late 1990s and today, like lumber, is at a nearly 30-year production low at 4.5 billion ft3. Per capita consumption of wood and paper products in 2011 was 907 pounds (lb), down from 1,480 lb in 2006. In addition, 157 lb of fuelwood was consumed per capita in 2011, a 20-percent reduction from 2006.
stop fires in the West by REFORM and amendment The Equal Access to Justice Act (EAJA) . Revise Improper Payments Information Act of 2002 (IPIA). GREATER use of Regulatory Flexibility Act to assess rules effects on small businesses. BETTER USE OF REINS Act.
Ecosystem services (PES) act were initiated in the 1985 Farm Bill with the creation of the Conservation Reserve Program followed by the Wetlands Reserve Program, Forest Legacy Program, the Forest Stewardship Program, and the Stewardship Incentives Program in the 1990 Farm Bill. Need to review this type of funding; Forest PES by the Federal Government increased about 53 percent from $340 million in 2005 to $520 million in 2011. In 2007, Federal PES accounted for 20 percent of all payments (public and private) to private forest landowners payments from all sources of about $2.6 billion in 2011. The Resources Planning Act (RPA) Assessment Update for 2015 mandate in the Forest and Rangeland Renewable Resources Planning Act of 1974, P.L. 93-378, 88 Stat. 475, as amended. The Forest Inventory and Analysis (FIA) program of the Forest Service, an agency of the U.S. Department of Agriculture (USDA), conducts inventories of the attributes of forest resources and reports them in the RPA Assessment and various supporting documents.
Recent changes in public land policy have had significant impacts on harvesting declined in the West by 20 percent. Nearly 20 Federal programs currently pay private forest landowners to enhance ecosystem services But NOT Harvesting or timber sales.
The sound of Timber jobs In 1873 Union Lumber Company had 15 mills in Yuba County along, and manufactured 4 to 6 million board feet of lumber annually . At first, the product from the mill was sold "at the saw' . And because the early mills were powered by water, a stream or pond in close proximity. The mills themselves were relatively simple and usually contained a single circular saw that cut 4,000 to 20,000 board feet daily (Cronise 1868). Transporting the logs from the woods to the mill was by oxen, with four or five yoke to a team . They pulled heavy wagons, called trucks, which usually carried just one or two large logs. The four wheels on the trucks were made of solid wood and sheathed with iron rims. wood shrank tightened up with wooden pegs. The standard method for loading the logs onto the truck was with a "crosshaul." This was facilitated by cutting a small trench into the hillside next to the truck and just slightly above it. Logs were piled just above the trench, and by means of peaveys and bars individual logs were hand-rolled into the trench and onto the truck. Larger logs were loaded with the help of oxen. The first members of the team were unhitched, placed on the other side of the truck, and used to pull (crosshaul) the logs onto it.

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Unrelated Comment Submitted by Anonymous (d d)

Submitter Information

Name: d d

General Comment

Back of our heritage, Logging again in our Forest , remembering the early lumber industry which was strongly influenced by its geography, a network of creeks and streams which played a crucial part in transporting logs to the mills. Waterways also transported the finished product from the mills to markets on the lower lakes. The lumber would be piled high on the decks of modified sailing ships known as "barges" or lumber "hookers." Later, railroads transported much of the lumber. It was Michigan white pine that provided the lumber for the building of the Midwest and prairie towns, and frequently was exported to European markets. It was also Michigan pine that rebuilt Chicago after its great fire.
Pine was popular with the loggers because it floated easily and thus could be driven down rivers and streams to the mills, or assembled into rafts and transported over the open lakes. Denser hardwoods like maple could not easily be felled and rapidly dulled the saws in the mills. The unmarketable hardwoods were often burned in local kilns to make charcoal for iron production. Three Michigan inventions of the 1870s were responsible for increasing the transportation of logs regardless of the weather. The first of the innovations called "big wheels," was invented by Cyrus Overpack of downstate Manistee. These ten feet diameter wheels were pulled by a team of oxen or horses and allowed rapid movement of logs without the need for snow cover. The high axle clearance easily allowed the wheels to move over stumps and rough clear cut ground. Prior to the big wheels, the logs were normally "skidded out" with oxen or horse teams to the main logging road. There they were loaded onto sleighs and hauled over ice roads to river banks

where they were stored until spring. The ice roads were also primarily a Michigan innovation. The unique roads were made by running a sprinkler over a logging road during frigid nights. By morning, the normally rutted and rough trails were turned into sheets of ice. During the day heavy sleighs loaded with logs could rapidly move over them.
The third innovation was the use of a narrow gauge railway to haul the logs instead of sleds or big wheels. First tried in Clare County, Michigan, during the winter of 1876-77 by Winfield Scott Gerrish, the narrow guage railroad rapidly became an industry standard.

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Document: FEMA-2017-0032-DRAFT-0036
Unrelated Comment Submitted by Anonymous (c c)

Submitter Information

Name: c c

General Comment

Electric cars Bad and wild farms bad for wildlife and humans, Toxic Rare Earth elements mined by children in Africa and made in China contained in both, also per a report done in 2014 maybe cancer-causing as they emit extremely low frequency electromagnetic radiation. Among other things, non-ionizing radiation includes: electro-magnetic fields (EMF) that are produced by electric power. Small business administration, Consumer Product Safety Commission, National Highway Traffic Safety Administration , and DOT should do further study to protect the public on electric cars, the standards of American National Standards Institute and the Institute of Electrical and Electronic Engineers regarding safety levels with respect to human exposure to RF in the 3,000 to 300 billion Hertz range. Past study have vested interests on one side of the issue or the other which makes it difficult to know which studies are trustworthy. numerous peer-reviewed laboratory studies conducted over several decades have found biologic effects from very limited exposures to ELF EMR. These studies suggest that the EMR guidelines established by the self-appointed, International Commission on Non-Ionizing Radiation Protection (ICNIRP) are inadequate to protect our health. Thus, even if EMR measurements do not exceed the ICNIRP guidelines, occupants of hybrid and electric automobiles may be at increased risk for cancer and other health problems. public should demand that governments adequately fund high-quality research on the health effects of electromagnetic radiation that is independent of industry to eliminate any potential conflicts of interest. SINTEF, the largest independent research organization in Scandinavia, The external

fields in the proximity of electric vehicle (EV) wireless power transfer (WPT) systems requiring high power may exceed the limits of international safety guidelines. Another Study; Results for the measured EVs showed that the exposure reached 20% of the ICNIRP 2010 reference levels for general public exposure near to the battery and in the vicinity of the feet during vehicle start-up, Larger surveys in standardized and well-described settings should be conducted with different types of vehicles and with spectral analysis of fields including lower frequencies due to magnetization of tires. Another study; Since batteries are distributed, the currents in the batteries and in the interconnectors may become a significant source for EMF emission. Another Study ; recorded radiation figures of up to 100 mG during acceleration. Measurements also peaked when the batteries were either full (and in use) or empty (and being charged from the engine), another study problem to determine a danger level for low-frequency radiation, in part because dosage is determined not only by proximity to the source, but by duration of exposure. May 2011 the World Health Organization added RF radiation from cell phones to its list of possible carcinogens, putting it in the same category as lead, chloroform, and coffee. There is a similar debate on the health effects of EMF from power lines. ionizing radiation, such as X-rays, has very high frequency, in the range of 100 billion Hertz, and very short wavelengths, 1 million millionth of a meter. Ionizing radiation has extremely high energy and can damage biological tissue and cause a number of health effects, including cancer. Non-ionizing radiation includes a variety of forms of electromagnetic radiation with enough energy to cause atoms in a molecule to vibrate or move, but not enough energy to remove electrons from the molecules (ionize them). Agencies need to study how to get rid of the Toxic elements made in China, after the end of the useful life? Example the 1000 lb electric car Toxic Battery.

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Document: FEMA-2017-0032-DRAFT-0027
Unrelated Comment Submitted by Anonymous (j t)

Submitter Information

Name: j t

General Comment

Fire Management agencies like Forest Service, Departments of the Interior, Agriculture, BLM, need update rules and regulations in Reclamation Manual Directives and Standards on how stop wildfires. Need New management teams for National Wildfire Coordinating Group, the old policies are not working to protect public from wildfire prevention The National Wildfire Coordinating Group (NWCG) is a group formed under the direction of the Secretaries of the Departments of the Interior and Agriculture to improve the coordination and effectiveness of wildland fire activities and to coordinate programs of the participating wildfire management agencies. We need new people in the Fire Executive Council. That understand the old policy are not working on wildfire prevention. The Fire Executive Council is a group formed to provide "coordinated interagency federal executive level wildland fire policy leadership, direction, and program oversight." Its membership is comprised of representatives from the Department of the Interior, the US Forest Service, and the Department of Homeland Security. According to the National Interagency Fire Center, more than eight million acres have burned in the United States by wildfires in 2015. That's an area larger than the state of Maryland. California wildfires burned million acres. Ecosystem-based management to control the adverse impacts of very large wildfires has become a societal imperative given the wide-ranging impacts from wildfires on water supply and water quality, particularly in the western U.S.
The 2001, the Secretary of Interior instructed Deputy Commissioner of the Bureau of Indian Affairs; Commissioner of Reclamation; and the Directors of BLM, NPS, FWS, and Geological

Survey to implement the FWFMP requires New ideas, and re-appeal Series 34-Public Land, Part 620 Wildland Fire Management, 620 DM Guidance for Implementation of Federal Wildland Fire Management Policy that are not working.
Only Wildfire Suppression is NOT working.. Response to wildfire including eliminates identified threats from particular landscape by MORE Fire fuel removal, timber sales, cutting dead and dying trees, Management of over grown bushes and trees.
Hazard Fuels Reduction. Reclamation should review and study better ways to undertake programs to reduce hazard fuels, especially in California areas of past burns. Develop new cooperative agreements with Indian tribes, state agencies, or local agencies, or through private contractors. Reclamation will undertake such programs in the most cost effective manner which is doing more before the fires, and based upon saving lives. update rules of engagement I National Fire Plan Operations and Reporting System by providing more resources , less red tape, less regulations, less reports.
Regional Fire Management Officer/Fire Program Manager. Regional Fire Management Officer (FMO)/Fire Program Manager (FPM) responsibility for coordinating all wildfire agreements, fire prevention ,education programs, burn plans, hazard fuels reduction programs, interagency need new directives.
Agencies should investigate and identify individual, organization, or agency to determined responsible acts that prevent wildfire fuel reduction, to pursue recovery of damages and costs .Update rules of NEPA documentation for hazard fuels reduction projects, burn plans, and BAER activities before implementation compliance with the NHPA according to RM D&S, Cultural Resources Mgt, LND 02-01 must change or rescinded .
A key impact of fires is the increase of soil erosion on health to public and wildlife . After the destruction increased transport of sediment, nitrogen, phosphorus into the downstream reservoirs during storm events. Such a wildfire storm event can severely impact the drinking-water quality, fish, and the health of wildlife and ecosystems and public . In particular, pollution from PM3 has been a widespread concern. wildfire pollution in rivers, wetlands, and estuaries is a pervasive concern in California. Question Why did the Cross-State Air Pollution Rule (CSAPR) 2012 act only cover 28 states and NOT include California? Wildfires in California, Wash, and Oregon produce massive amounts of Co2 ?? the act was to address air pollution from upwind states that crosses state lines and affects air quality in downwind states. wild fires affect vegetation interception, soil structure, erodibility, burn severity, sediment erosion, and speciation in soil and receiving waters, post-fire runoff affect soil erosion. recent series of high-intensity wildfires in the Western United States should make Reclamation facility managers aware of the potential large areas of dead or fallen fuels for severe fires upstream. response is required before a fire to prevent adverse impact to the public. Too much Hazard Fuel. A fuel complex defined by kind, arrangement, volume, condition, and location that presents a threat of ignition and resistance to control.

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Unrelated Comment Submitted by Anonymous (e e)

Submitter Information

Name: e e

General Comment

To put Wildfire emissions from combustion and decay into perspective, they are equivalent to adding an estimated 7 million more cars onto California's highways for one year, each spewing tons of greenhouse gases out tailpipe. Stated another way, this means 50 percent of all cars in California would have to be locked in a garage for one year to make up for global warming greenhouse gas impact of these wildfires. Greenhouse gas emissions from decay are generally larger than combustion emissions. The reason is that 3.67 times the carbon content of biomass is released as CO2 during decomposition. Therefore, forests emit more CO2 when they decay than when they burn because large quantities of biomass remain in the forest after combustion. However, chaparral and brush fields burn more completely, so combustion emissions can exceed decay emissions. Combining combustion and decay emissions provides a more complete picture of the impact of wildfires on global warming. In general, CO2 emissions from decay after a forest fire are three times the amount emitted during combustion.
Timber sales are one big answer to compensate for greenhouse gas emissions from wildfires is to lower the amount of biomass available for decay. Removing dead trees and storing carbon they contain in solid wood products consumers need can reduce total CO2 emissions by 15 percent. with interim harvests for wood products after planting, effectively reverses impact of wildfire emissions on global warming. illustrate an opportunity that is still available to remove dead trees from public forestlands and to manufacture solid wood products before the trees lose their economic value. The money could be used to help pay for planting. This would restore

these forests at minimal cost to the public, reduce and recover greenhouse gases from these wildfires, protect nearby communities from another wildfire, and help fight global warming. it is essential to remove dead trees. Not only does it make it safe to plant, but it also reduces emissions from decay by storing CO2 in solid wood products. Equally important, removing dead trees and replanting would help protect surrounding communities from a second wildfire, which is called a reburn, that often occurs in fire-killed forests that become brush fields filled with dead trees. Without money made available from harvesting and selling fire-killed trees, there is little chance that the Forest Service will be able to pay to remove dead trees, plant young trees, and manage the young forest by releasing overtopping brush to ensure that a brush field doesn't take over the area.

Tree density, especially young trees growing under larger trees as ladder fuel, and surface fuels are the two most important contributors to the size and severity of wildfires. Most natural fires didn't sweep across landscapes destroying whole forests as wildfires do today. Underlying cause of modern catastrophic wildfires is overcrowded with trees or too many trees. with trees of all sizes intermixed to form a uniform mass of fuel spreading over the landscape. They averaged 350 trees per acre when 50-60 trees per acre would be natural. Those who have not stood in the midst of flames 200-feet high, felt the overwhelming heat from a temperature more than 3,000 degrees Fahrenheit, and smelled the smoke and gases released, cannot fully appreciate a catastrophic wildfire. It is awesome and terrible, and firefighters who brave these conditions deserve our respect.an industrialized world can't live with fire. We would have to move out of our forests to be safe and get out of our cars to eliminate tailpipe emissions to make up for the greenhouse gases that wildfires emit into the atmosphere. only solution is to fight and protect our communities and forests by reducing the threat of catastrophic wildfires. The Angora Fire of 2007 blackened 3,100 acres of forest and destroyed 254 homes in the Tahoe Basin because most of the forest was so dense. Estimates that combustion emissions could have been lowered from 46.2 tons per acre to 12 tons per acre if the density of trees had been reduced from 273 per acre to the more natural density of 60 per acre. A fire burning in the same forest after thinning would not have been catastrophic. It would have killed few large trees, covered less acreage, and left adjacent communities relatively unharmed. The Angora, Fountain, Moonlight, and Star Fires wildfires burned over 144,825 acres of forestland. Forest also contained unnaturally heavy surface fuels composed of litter, duff, down dead wood, shrubs, and small trees that ranged from an estimated 25 to 40 tons per acre. Tree density, especially young trees growing under larger trees as ladder fuel, and surface fuels are the two most important contributors to the size and severity of wildfires. The most important question is: Can we recover from our mistake of letting forests become unnaturally overcrowded with trees and vulnerable to catastrophic wildfire

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Unrelated Comment Submitted by Anonymous (r r)

Submitter Information

Name: r r

General Comment

The United States has suffered one of the worst wildfire seasons in recent history this year. According to the National Interagency Fire Center, as of now, more than 8.5 million acres have burned in 2017 so farmore than 47% higher than the 10 year average. In 2016, the Department of the Interior and the USFS spent almost $2 billion combined on wildfire suppression. Interjurisdictional coordination challenges and an accumulation of hazardous fuels in national forests due to a lack of active forest management increase fire risk to communities and threaten the federal government's ability to rein in firefighting costs. We must address the chronic litigation that hinders our resource/land management professionals
Federal Firefighting Costs (Suppression Only) per year 2016 total fires 67,743 with 5,509,995 acreage burned cost was $1,975,545,000,.... 2015 we had 68,151 fires on 10,125,149 burned acres and costs $2,130,543,000, 2014 total fired 63,312 on 3,595,613 Acres burned at costs $1,522,149,000, ... 2013 fires 47,579 on 4,319,546 acres burned with cost of $1,740,934,000,..... 2012 fires 67,774 on 9,326,238 acres burned at cost of $1,902,446,000, In 2011 fires 74,126 with 8,711,367 acres burned at cost of $1,374,525,000. This is outrageous, new management new ideas are need.
Time to Sell Timber for Forest Service income which also thins the forest of old growth and dead bushes. USFS should expedite regulatory analyses for timber sales. This will provide the USFS with some of the revenue it needs to execute critical and time-sensitive pre-fire thinning and cutting work. improving forest health and reducing wildfire risk. Increased active

management will generate more revenue for the federal treasury and the critical services provided by counties, and promote job creation and economic growth in counties across the nation. a market-driven approach to forest management projects can work to achieve both forest management goals and increased forest production. Increased utilization of commercial thinning activities reduces fire risk, provides ecological benefits, and can provide the federal government with additional financial resources to better manage our forests. USFS with an opportunity to implement improved and efficient forest management practices and minimize the impacts of catastrophic fire. The Equal Access to Justice Act (EAJA) must be reformed to ensure litigants are not able to exploit the law, and avoid legal caps on attorney's fees against the USFS.

So why can the past EPA administration criticize gas and oil industry, coal, pipelines, greenhouse gas emissions when the clear and present danger was right in front of them in the form of Wildfires. Wildfires contain particulate matter, hydrocarbons and other organic chemicals, nitrogen oxides, and trace minerals. The individual compounds present in smoke number in the thousands. Particulate matter is the principal pollutant of concern from wildfire smoke. these particles are within the fine particle PM2.5 fraction and can be inhaled into the deepest recesses of the lung and may represent a greater health concern than larger particles. Another pollutant of concern during smoke events is carbon monoxide, which is a colorless, odorless gas produced by incomplete combustion of wood or other organic materials. Wildfire gaseous pollutants are precursors for ozone (O3) production.

Wildfire was not even in the reports as to cause of greenhouse gas emissions. Total witch hurt. Agencies need to re examine all emission reports. California should be part of Cross-State Air Pollution Rule (CSAPR). Repeal and replace or review the Wildland Fire Leadership Council (WFLC), National Strategy Committee (NSC) , Fire Executive Council (FEC) , National Cohesive Wildland Fire Management Strategy, Federal Land Assistance, Wildland Fire Implementation Plan (WFIP), Wildland Fire Situation Analysis, The Wildland Fire Situation Analysis process, Guidance for Implementation of Federal Wildland Fire Management Policy (2009), Land/Resource Management Plan (L/RMP), Management and Enhancement Act of 2009 (FLAME Act), WFLC was established in April 2002 by the Secretaries of Agriculture and the Interior to provide an intergovernmental committee to support the implementation and coordination of Federal Fire Management Policy. In April 2010, the Secretaries of Interior, Agriculture and Homeland Security authorized the continuation of the WFLC.

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Submitter Information

Name: w w

General Comment

The immensity of greenhouse gas emissions from California wildfires has been a warning for years. the causes of catastrophic wildfire are complex of old trees, dead bushes, etc, the status quo of inaction has exacerbated present forest conditions, which now present a great risk to both communities and the environment. If managed wisely, and remove the environmental activists that has stop forest personal from cutting old growth. America's national forests can provide clean water, wildlife habitat, recreational opportunities, and abundant domestic supplies of wood products and support rural communities and thousands of jobs in the timber industry. Clearly, we must make every effort to reduce the amount of excess biomass in forests to prevent catastrophic wildfires. That means decreasing the number of trees by thinning to make them more resistant to crown fires, which will also restore the natural health and diversity of our forests. Reducing the number and severity of wildfires may be the single most important action we can take in the short-term to lower greenhouse gas emissions and fight global warming. The catastrophic wildfires that ravage California each year don't resemble the historic fires that took place in these forests for millennia. Just too many over grown bushes and trees. They exceed emissions that would have occurred in historic fires because the biomass available to burn is so much greater than it was in natural forests. Consequently wildfires, when the massive amounts of fuel in these forests burned, they released an estimated 9.5 million tons of greenhouse gases into the atmosphere just from combustion. That is an average of about 63 tons per acre. However, combustion is only part of the story because dead trees also gradually release CO2 as

they decay. CO2 emissions from decay are generally three times greater than emissions from combustion because large quantities of wood and other plant material remain unburned after a forest fire. Combining combustion and decay emissions. Estimates that fires will emit a staggering 38 million tons of greenhouse gases into the atmosphere. Fires released one fourth of the gases during combustion, and post-fire decay will release the remainder during the next 100 years, most of it during the next 50 years. Wildfire gaseous pollutants are precursors for ozone (O3) production. California should be required to limit wildfire NOx emissions to reduce ozone, and to limit annual NOx and SO2 emissions to reduce fine particle pollution. Mercury emissions from forest fires (QHg) (in kg of mercury per year) can be estimated following a bottom-up approach by the equation: contribute substantial emissions of gases and particles to the atmosphere.

Over the years, outside the regulatory process, well-funded special interest groups have use lawsuits to force federal agencies to issue regulations that advance their priorities. At some point, this exercise of "Sue-and-Settle" and the practice of acquiescence through consent decrees or settlement agreements, which were often crafted behind closed doors and without the transparency of the rulemaking process, became all too common, paying tens of thousands of dollars in attorney's fees to these groups with which were settled. More transparent process in which impacted parties and states have a voice and creates more awareness for the general public is needed. Policies and rules should reflect common sense, consistent with statutory authorities so the public will benefit from greater un-regulatory providing economic certainty not the Environment activist .

REFORM The Equal Access to Justice Act (EAJA) . Revise Improper Payments Information Act of 2002 (IPIA). GREATER use of Regulatory Flexibility Act to assess rules effects on small businesses. BETTER USE OF REINS Act expedited congressional vote on all major or significant rules before they are effective. REFORM National Environmental Policy Act (NEPA). Wildfires need to be included in EPA issued rules in 2012 and early 2016 to control emissions of volatile organic compounds (VOCs) to address safety . These emissions can impact air quality and even climate. Daily emissions of particulate matter and numerous trace gases from wildfires mercury emissions from major natural sources and their variations with meteorological conditions is considered one of the major priority in estimating the relative contribution of major natural sources compared to industrial sources and ultimately to evaluate the mercury flux released to the atmosphere on regional and global scale. estimate the contribution of wildfires to the total mercury released to the atmosphere. An accurate estimate of carbon fluxes associated with California wildfire over the last two decades is needed to balance the global carbon budget not oil and gas or coal, or factories. and train more personal for forest mills.

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Submitter Information

Name: j j

General Comment

Wildfires should be part of Carbon emissions standards. (CSAPR) , which the regulation failed to consider. States that restrict forest service work, and allow forest fuel to build up need to pay their fair share. If we add Wildfire to the cause of climate Ozone impact then we could save billions on Regulations of the wrong industries the past administration was fighting. Environmentalist activists like to blame drought, but California received record-breaking rains in the winter of 2016-2017, with historic levels of tree die-off, makes you wonder who is watching the hen house.
WILDFIRES contain substantial amounts of MERCURY emissions (2 to 7 mg Hg-m-2 per fire event) due to the build-up in surface material over long time periods. Large wildfires have a considerable impact on the atmospheric concentrations of CO2, CO, O3, NOx, and carbon dioxide C02 carbon monoxide (CO) and METHANE (CH4) across North America. Carbon releases can be as high as 4 to 8 kg C-m-2 per fire event. Wildfire emissions significantly affect concentrations far downwind. Atmospheric measurements have pointed to wildfires as a significant source of CO to the atmosphere. With CO, O3, nitrogen oxides, and equivalent black carbon show fires to be of great levels of these gas to a hemispheric scale. Large regional fire events over short time periods produce very high rates of emissions.
PAST ADMINSTRATION BACKWARD THINKING....Last year fire management alone consumed 56 percent of the USDA Forest Service's national budget. As fire suppression (AFTER THE FIRE), costs continue to grow as a percentage of the USDA Forest Service's

budget, funding is shrinking for non-fire programs(BEFORE THE FIRE STARTS), that protect watersheds and restore forests, making them more resilient to wildfire and drought. Most of fire budget should be for before fires not after fires.
During summer 2004 there were times when CO from the Alaska/Canada fires exceeded anthropogenic CO in the New England region and exacerbated ozone levels as far south as Houston. Wildfire increase regional and global carbon and trace gas emissions.
Chronic litigation is hindering our Forest Service, Agriculture, Fish and wildlife, and other resource/land management professionals.
With a staggering all time high of 129 million dead trees in California along, impacts have MAJOR ISSUE on Ozone atmospheric conditions.
Government spend billions to fight oil, gas, coal, factories under the pretense of flawed reports, yet the clear and present danger is Wildfire emission CO2, CO, O3, NOx, and CH4 and (PM2.5) but nothing is spend to stop the flawed ideas of not cutting and thinning old growth.
Possible shell game by Environmental activist, or global religion called diversion strategies which diverts the regulators from these serious concerns.
Estimates of NOx, formaldehyde, and glyoxal emissions from biomass burning events derived from enhancements measured by a OMI (Ozone Monitoring Instrument). The location of a particular ozone isopleth is defined by the ratio of the VOC and NOx coordinates of the point, referred to as the VOC/ NOx ratio. The VOC/NOx ratio is important in the behavior of the VOC-NOx-O3 system. Moreover, it has a major effect on how reductions in VOC and NOx affect ozone concentrations. The increase in peak ozone concentration at relatively low VOC/NOx ratios that occurs when NOx is reduced has been a major issue in the development of ozone control strategies. NOx reductions will have significantly different effects depending on the particular VOC/NOx ratio, which varies significantly within an air basin
Public exposure to wildfire smoke is a concern because a large proportion of wildland fire smoke emissions is fine particulate matter (PM2.5) that can penetrate to the deepest parts of the lungs. are 2.5 micrometers in diameter or smaller, and can only be seen with an electron microscope. Fine particles are produced from all types of combustion, including residential wood burning, forest fires.
December 11, 2017 - The USDA Forest Service additional 27 million trees, died throughout California since November 2016, to an historic 129 million on 8.9 million acres.
The dead trees pose a hazard to people and critical infrastructure. The number of dead and dying trees has continued to rise, along with the risks to communities and firefighters. Regional Forester of the USDA Forest Service. California's trees remain vulnerable increased wildfire threat. The USDA Forest Service focus on mitigating hazard trees and thinning overly dense forests so they are healthier and better able to survive stressors like this in the future.
Fires are very large and often severe in many ecosystems of the region. In 2004, more than 5.8 million ha burned in Canada and Alaska, one of the largest fire year on record for the North American. Forest Service needs to stop the environmentalist for doing their job to protect the lands and people.

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Unrelated Comment Submitted by s s

Submitter Information

Name: s s

General Comment

Wildfires NOT Agriculture, can you imagine Past EPA wanted you to believe sand was bad thing?? What? EPA lacked actual measurements of what agriculture emits in the form of fine particulate. Agriculture is not a major emitter of this pollutant, but Wildfire is sending major PMs ozone emissions , However, nothing has been done to date to correct faulty documentation that overestimates agricultural sources. The data used to develop this inventory was based on erroneous emission factors published by CPA for cattle feed yards, feed mills, grain elevators and dust from farmers' field operations. there has never been any actual PM-2.5 emission data taken on agricultural tillage equipment using EPA approved PM-2.5 samplers. And nothing was added from wildfires emissions to the data.
Wildfires was not part of EPA issued rules in 2012 and early 2016 to control emissions of volatile organic compounds (VOCs) to address safety but These wildfire emissions can impact air quality and even climate. Daily emissions of particulate matter and numerous trace gases from wildfires mercury emissions from major natural sources and their variations with meteorological conditions is considered one of the major priority in estimating the relative contribution of major natural sources compared to industrial sources and ultimately to evaluate the mercury flux released to the atmosphere on regional and global scale.
Agencies should emphasize the necessity to fully study PM-2.5 before deadlines are set and rules are developed. The science employed in developing this rule is not up to par, and concerned that farmers could bear the brunt of a bad policy based on equally bad science. We

don't have the research yet to know whether rules can actually attain theme standards, how much it will cost the agriculture industry and the consuming public, and bow much agriculture activity actually contribute to air pollution problems.
Agencies should be careful by not tipping the balance of regulation in this country too far, and force our grocers to fill market orders with food purchased from other countries that do not always meet the same safeguards and health standards as U.S. produced commodities. The agriculture community enjoys breathing clean air as much as anybody, yet doesn't want to waste money on control measures that have little or no effect on cleaning up the air of this nation.
Over the past 4 decades, there has been a doubling of the annual area burned across the North American regions which has resulted in an increase in the atmospheric emissions from fire. Fuel consumption in ecosystems with large organic deposits (peatlands and forests with deep duff layers) is highly variable, depending primarily on fuel moisture and layer thickness.
Fire in these surface organic layers are subject to more carbon to combustion and often burn in residual smoldering combustion which results in less efficient burning and higher levels of non-CO2 trace gasses than flaming fires. New evidence indicates wildfires in the forest regions generate substantial amounts of mercury emissions (2 to 7 mg Hg-m-2 per fire event) due to the build-up in surface material over long time periods. Estimates of NOx, formaldehyde, and glyoxal emissions from biomass burning events derived from enhancements measured by OMI (Ozone Monitoring Instrument). Emissions from biomass burning. The location of a particular point on the ozone isopleth is defined by the ratio of the VOC and NOx coordinates of the point, referred to as the VOC/ NOx ratio. The VOC/NOx ratio is important in the behavior of the VOC-NOx-O3 system.
When local air quality administrators make decisions about which pollution control programs to implement they should consider factors such wildfires that is caused activity or sources, and costs and benefits of implementing a set of controls on these activities.
Conditions, technology and practices, along with a number of other factors determine emissions.
government policies that are based on sound scientific evidence; emissions of identifiable atmospheric pollutants; better understanding and research on the implications of atmospheric pollution and the means of preventing it. The evidence is quite strong that conservation has been a priority for farmers and ranchers for many years.
It is an absolute necessity to allow science surrounding PM-2.5 to develop so that intelligent, reasonable and justifiable decisions should not be from faulty documentation that overestimates agricultural sources impacting of new air standard on the agricultural community.
the National Ambient Air Quality Standard (NAAQS) for particulate matter hinder farms and poor taxpayers. Agency should allow the necessary time for the agriculture community and EPA to gain a more accurate understanding of agriculture emissions by adding wildfires to understand what extent the air quality standards and the impact from industry and nature for PM-2.5 standard if any.

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Unrelated Comment Submitted by Anonymous (d d)

Submitter Information

Name: d d

General Comment

stop the wildfires in west, time to change, support timber sales in west....In 1630, the estimated area of U.S. forest land was 1,023 million acres or about 46 percent of the total land area. Forestry issues on Harvesting and sale should be considerable significance to the United States. In 1995 USA had 5 percent of the Earth's population and consumes an estimated 28 percent of the Earth's industrial wood products. Although domestic timber inventory is only 10 percent of the Earth's total, 96 percent of U.S. consumption of industrial wood comes from domestic supplies. By 1910, the area of forest land had declined to an estimated 754 million acres, or 34 percent of the total land area. In 2012, forest land comprised 766 million acres, or 33 percent of the total land area of the United State. Forest area has been relatively stable since 1910, although the population has more than tripled since then. Of the total forest land, 10 percent are classified as reserved. This classification indicates that these forest lands are not managed for timber harvest, which is prohibited by law on these lands in most cases. Reserved forests have changed very little since 2007, with a very small (2 percent) reduction in area. Nationwide, reserved forest area is more than three times what it was only 59 years ago. Most reserved land is in the West, reflecting a larger proportion of publicly owned land in that region. In general, U.S. private forest land is classified as "timber land" by FIA, even if landowners do not intend to harvest timber. The South contains 40 percent of the Nation's 521 million acres of timber land.
In contrast, the West constitutes only 28 percent of national timber land, and the North 32

percent. Time for change to timber sales to stop fuel build. The South is often referred to as the "woodbasket" of the United States because of the extensive timber supply, (yet few fires). West is host to most of the Nation's reserved forest and national parks. (time for change to timber sales to stop fires). Other woodlands, including scrub forests, are found in the highest concentrations in the West. U.S. forest ownership patterns are quite diverse with public forests dominant in the West. Federal Government predominantly owns public forest lands in the West and State and county governments own most of the public lands in the East. Of all public forest acres, 75 percent are in the West. Removals have shifted in recent years from public lands in the West to private lands in the East. Recent studies show that only 8 percent of the families and individuals who own U.S. forest land have a written management plan. Private forests provided 88 percent of the Nation's timber harvest in 2011. In 2001, the forest industry owned 66 million acres (13 percent) of the Nation's 504 million acres of timber land but supplied 29 percent of wood production.

Recent changes in corporate strategies have shifted the traditional view of industrial forests. Age of timber, In the South, where more acres of short-rotation yellow pine trees are planted, 51 percent of timber land is less than 40 years old compared with 20 percent in the North and 22 percent in the West.

In contrast, 56 percent of northern timber land is more than 60 years old, compared with 27 percent in the South and 69 percent in the West. In the West, hemlock-Sitka spruce forests and ponderosa pine have declined since 1977, while western pine forests have increased. In the West, planting is generally used to augment natural regeneration. In recent years, western U.S. forest planting has subsided, a trend that mirrors reduced harvesting in that region. U.S. timber land growing stock inventory, growth, removals, and mortality, by region.

Inventory West in 1953 was 363,666 Million cubic feet, in 2012 inventory grew to 397,968 Million cubic feet. Removal in 1952 was 3,765 Million cubic feet in 2011 dropped to only 2,446 Million cubic feet, yet Mortality (dead trees) 1952 was 2,242 Million cubic feet and 2011 grew to 3,679 Million cubic feet.

During the past 60 years, net growing-stock growth has consistently exceeded growing-stock removals in the United States. In terms of percent of standing volume, removals are at the lowest level in the past 60 years and growth has also slowed. The volume of annual net growth is currently 2 times higher than the volume of annual removals. Forest biomass consumption for energy has declined during the past several years.

Mortality rates relative to inventory continue to rise in the West where mountain pine beetle affected millions of acres of forest between 2009 and 2010.

Need for timber sale and clean the dead and dying for Root diseases, bark beetles, were the leading contributors to mortality risk in the coterminous United States.

Stop importing lumber ..... and tend to America's garden.