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## **Comment:**

In 2015 USFS Chief Dave Bosworth Said, We Do Not Have A Fire Problem On Our Nations 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). Ventura county fire Dec 2017, California Northern Wine county, 2016 fires, etc Million acres in California 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 due to smoke and haze, when will California get to the real issue 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," .. particularly for at-risk groups and to safety, and to transportation through diminished visibility on roads and aviation corridors as well as impacts to fire personnel. In contrast, prescribed fires provide an opportunity to adjust the timing of fire and some ability to manage the amount of smoke and its path, thereby reducing the impact of fire emissions. Prescribed fire, managed using basic smoke management practices, can reduce the impacts on air quality while meeting fire-related objectives. 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 regulations based on National Fire Protection Association Standard 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants. California should provide compensatory measure guidance documents ensure protecting the public.

**First Name:** Anonymous

**Last Name:** Anonymous

**ZIP/Postal Code:** 

**Email Address:** 

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