

The Honorable Earl L. “Buddy” Carter

1. Georgia is the largest forestry state in the country, and it is our understanding that controlled burns help to prevent wildfires in your state.

a. How would the recent PM_{2.5} standard impact the amount of prescribed burn days in your state?

The recent PM_{2.5} standard could significantly decrease the number of prescribed burn days in Georgia. Areas of the State designated nonattainment would require limits on the number of burns and the size of the burns to bring the areas back into attainment. Areas of the State designated attainment would also require limits on the number of burns and the size of the burns to bring down the PM_{2.5} background and increase the PSD “head room” to allow new industry to pass PM_{2.5} permit modeling. The Georgia Forestry Commission (GFC) is currently burning 1.4 million acres per year, but GFC would like to increase that amount to 2 million acres per year. Not only will the new PM_{2.5} standard prevent that from happening, but it will also force the GFC to have less prescribed burning than it is currently performing.

b. If the amount is reduced, will the risk of wildfires and diminished air quality increase?

Yes. As the number of prescribed burns decreases, the risk of catastrophic wildfires increases resulting in diminished air quality. It should be noted that Georgia has very few wildfires each year thanks to our aggressive prescribed burning program.

2. During the hearing you stated the number of exceptional event petitions that States will have to submit to EPA because of the revised PM_{2.5} standard will increase significantly.

a. Has the EPA been timely and consistent in their review of exceptional events petitions to date?

Georgia has not had to previously submit any exceptional event demonstrations to EPA for approval because Georgia has been in statewide attainment under the previous standard. However, Georgia EPD is aware that EPA has been slow to review and approve exceptional event demonstrations submitted by other states which has resulted in difficulties for those states to maintain attainment with the standard.

b. What level of burden will the increased petitions place on State air quality agencies, such as yours?

Georgia has six to twelve different areas of the State that will be required to submit exceptional event demonstrations in order to remove high PM_{2.5} values from the dataset for comparison to the 2024 annual standard. It is estimated that hundreds of exceptional event demonstrations will be required in Georgia to bring all areas of the State into attainment with the standard. Each of these exceptional events will be 50-100 pages in length and will require significant work hours (three full-time employees) to complete. As previously mentioned, the Georgia Forestry Commission (GFC) is currently burning 1.4 million acres per year, but GFC would like to increase that amount to 2 million acres per year. To accommodate this, Georgia EPD will need to develop approximately 100

exceptional event demonstrations each year for every year in the future (until the end of time) to remain in attainment with the new standard. This does not seem to be a sustainable solution to address the need to continue to perform prescribed burning in the future.

- c. Do you think EPA should be transparent about its decisions relating to exceptional events and wildfire risk reduction decisions, and have a database of such decisions so other states may benefit from its decisions?**

Yes, EPA should maintain a public database of exceptional event decisions. This would be extremely beneficial to Georgia and others states that are assembling exceptional event demonstrations because it would allow us to see what is and is not acceptable to EPA for approval.

3. Your department is responsible for submitting State Implementation Plans to the EPA to implement NAAQS.

- a. In your opinion, would the draft's requirement on the agency to issue implementation regulations and guidance concurrently with a revised standard, help the States to implement the standard?**

Yes. Time is critical when a new standard is issued by EPA due to the significant amount of work that is required to be completed within statutory deadlines. Implementation regulations and guidance should be issued concurrently with the revised standard to allow States the maximum amount of time to implement the new standard.

4. The EPA has stated it does not need to issue updated guidance for its revised PM_{2.5} standard because its 2016 guidance applies.

- a. Will the EPA's 2016 guidance effectively assist States in implementing the lower 2024 standard?**

The 2016 guidance may assist States in implementing the lower 2024 standard. However, most States (including Georgia) have not actually needed to use the 2016 guidance yet, so it is unclear if this guidance will or will not be adequate for the many unique situations that are likely to arise as the entire country moves forward with implementing the 2024 standard.

5. I am concerned about States being punished for emissions outside of their control, particularly as standards reach background levels.

- a. Should states be fined for emissions outside of their control?**

No. States should not be penalized for emissions outside their control. Emissions outside a State's control include: (1) natural sources, (2) interstate transport, (3) international sources, (4) mobile sources such as heavy-duty diesel trucks, locomotives, airplanes, and marine vessels, and (5) military bases.

The Honorable Russ Fulcher

1. Tell me how Georgia would utilize the ability to be part of the “scientific review” requirement of this draft legislation, given this particulate matter stems from a diverse mix of sources - wildfires, fugitive and road dust, agricultural dust, vehicles, production, and so on? I ask because as we know, the federal government’s backlog of forest thinning projects to manage wildfire mitigation out West is horrendous. And yet, we continue to see the Biden Administration adding more acreage for federal management. I have introduced legislation that passed the House to extend Good Neighbor Authority to counties and tribes to help, but it remains a challenge.

Georgia would utilize the “scientific review” to examine the contribution of diverse sources of particulate matter, including wildfires, prescribed fires, fugitive and road dust, agricultural dust, mobile sources (including cars, trucks locomotives, airplanes, and marine vessels), and industrial sources to determine which sources were under the control of States (home state vs. neighboring states), which sources were under the control of the Federal government, and which sources were outside the control of both State and Federal governments. Taking all of these factors into account, determining which contributors are subject to federal or state regulation, and then setting standards based on that analysis would help set better nationwide standards for all criteria air pollutants.