
September 23, 2019

Anne Idsal
Acting Assistant Administrator
Environmental Protection Agency
Office of Air and Radiation, 6101A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Acting Assistant Administrator Idsal:

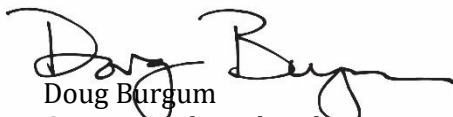
Western Governors appreciate the Environmental Protection Agency's (EPA) consultation with state air quality agencies on its "Final Exceptional Events Guidance: Prescribed Fire on Wildland that May Influence Ozone and Particulate Matter Concentrations" ([Guidance](#)). Smoke from wildfires can result in exceedances of the air quality standards for particulate matter and ozone, affecting public health, safety and transportation. Prescribed fire, which is carefully managed and monitored by state air quality agencies and land managers, can reduce these effects.

This Guidance is responsive to the Governors' request in WGA Policy Resolution [2018-05, Air Quality and Methane Emissions Regulation](#), for simplified exceptional events guidance for prescribed fire and additional tools to address the air quality effects of uncharacteristic wildfire. It also addresses many of the issues outlined in the January 10, 2019 comments of the Western States Air Resources Council. Governors encourage EPA to apply the consultation process employed for the Guidance – which included the exchange of documents with state agencies prior to their public release – to other EPA actions affecting states.


This meaningful exchange resulted in more effective policy by incorporating the views of state air quality agencies, EPA's primary partners in implementation of the Guidance. Among other things, the Guidance now: identifies the elements that apply to particulate matter (in addition to ozone); emphasizes a weight-of-the-evidence approach; clarifies its application to exceptional events on private lands or in adjacent states; and provides greater detail on the certification process for Smoke Management Plans. Building on this exchange and the resulting Guidance, the Governors urge EPA to work with states to determine the regulatory significance of any flagged monitoring data and to act on state exceptional event demonstrations in a timely manner.

Thank you for encouraging the responsible use of prescribed fire as a management tool and developing this Guidance through an exemplary collaborative process with states. We look forward to continuing to work with EPA to address the air quality effects of uncharacteristic wildfire in the West.

Sincerely,



Doug Burgum
Governor of North Dakota
Chair, WGA



Kate Brown
Governor of Oregon
Vice Chair, WGA