

CAPCOA Policy Statement on Prescribed Burning

The California Air Pollution Control Officers Association (CAPCOA) represents the executive officers of the 35 local air pollution control and air quality management districts in California. Many of the local air districts oversee hundreds of thousands to millions of acres of forested land that is in significant need of aggressive fuel reduction and forest resiliency projects, including the increased use of prescribed fire. Air districts are also on the front lines as public health agencies responding to catastrophic wildfires and providing health information to the general public.

Role of Local Air Districts in Prescribed Burning Activities

Air districts are directly responsible for the regulation of stationary sources of air pollution, including overseeing activities such as prescribed burning, agricultural burning, residential open burning, and use of wood for heating. We work in collaboration with the California Air Resources Board (CARB) to balance the fuel reduction needs of land managers, agriculture, and property owners, while protecting public health¹. And while the district-permitted combustion activities mentioned above allow emissions into air basins that may be already burdened by other air pollution impacts, these emissions pale in comparison to emissions from catastrophic wildfires that have immediate and long-lasting health and economic impacts.

Managing Prescribed Burning Activities

State law imposes special requirements for land managers undertaking prescribed burns, including submittal of smoke management plans with meteorological and emissions information for district staff to assess smoke impacts, evaluation of alternatives to burning, possible deployment of monitoring equipment, and procedures for public notification and reporting of public complaints. Other sections of Title 17 provide meteorological criteria in different air basins that allow for CARB to forecast permissive burn, no burn, or marginal burn days, and to set a limit on total burned acreage based on current air quality and meteorological data.

Determining Burn Day Frequency

Land managers sometimes cite lack of available burn days as a barrier to prescribed burning. In response to concerns expressed through the Governor's Tree Mortality Task Force Prescribed Fire Work Group, CARB staff performed a review of burn days over a 4 year period in several air basins, coupled with actual reported burn acreage. The review indicated that overall, burn days are predominantly available and that land managers could increase the use of prescribed fire within the current air quality management structure set by CARB and the local districts through Title 17. Land managers can also request to burn on a no burn day by contacting the local air district. The challenge for land managers is to strategize ways to be ready when smoke management plans have been approved and burn windows are open, including usage of times of the year outside of the traditional prescribed fire season.

Air District Challenges

District Staffing- The staffing at each district generally reflects the number and size of stationary sources within the district, mobile source emissions, ongoing air quality relative to state and federal attainment standards, and other community and public health needs. In addition, in order to facilitate the effective use of prescribed fire, most air districts do not fully recover the costs of implementing their prescribed fire programs through their existing permit fee structure, especially in rural districts where the overwhelming majority of prescribed burning takes place. As such, most districts cannot devote significant staff time to on site monitoring and interaction with the land manager without significant increases in cost recovery, which

¹ Title 17 of the California Code of Regulations Sections 80100- 80330, regulating agricultural and prescribed burning through smoke management planning in coordination with CARB.

could have the unintended consequence of suppressing the increased use of fire as costs to land managers would increase.

During catastrophic wildfires, rural districts rely on CARB for significant support in air quality monitoring and equipment needs, modeling, and public messaging. While an expanded prescribed burn program would not require the level of staffing and resources needed for short term catastrophic wildfires, an efficient program run at a local district level would require increased support through additional funding, equipment, and continued support from CARB.

Public Health Impacts- In addition to the resource and staffing issue, both urban and rural districts have to also account for and mitigate air quality impacts in areas that are under significant federal and state pressure to meet and maintain air quality standards for criteria pollutants, including ozone and particulate matter. The majority of Californians live in areas that do not meet federal air quality standards for particulate matter, and periods with unhealthy air can result in immediate and observable public health and economic impacts. While prescribed burns are understood to have less impact than catastrophic wildfires, current federal policy does not allow for exceedances of air quality standards that may have been due in part to a prescribed burn. Economic and community impacts to attainment areas would be severe should they lose their attainment status due to poorly managed prescribed fires.

Monitoring and Modelling Capability- California has an extensive and robust stationary monitoring network; but by design, the majority of the particulate monitoring is in the vicinity of heavily populated areas that may not adequately represent communities, especially rural communities, that could potentially be impacted by increased prescribed burning. Wildfire events typically receive a robust level of attention from air quality regulators and land managers with continuous monitoring, modelling, and public health messaging that can last for weeks or months at a time. In implementing this, air districts, CARB, and land managers use portable particulate monitors during wildfires that can be placed in the vicinity of events or near potentially impacted communities. At the air district level, the majority of this work is unfunded, which can cause significant financial hardship; and in many rural air districts, such work does not happen without assistance from CARB.

Increasing prescribed burns, either the duration or the acreage of an individual burn, will likely require an increased level of monitoring and modelling in order to ensure that the resulting emissions do not directly result in localized public health impacts or contribute to exceedances of air quality standards. In addition, there will need to be an increase in public outreach and communication during prescribed burn events to better inform potentially impacted communities.

Prescribed Fire Recommendations

1. Air districts need to be recognized as a key partner and stakeholder in any proposals to increase the pace and scale of prescribed fire.
2. Air districts, CARB, land managers, and other stakeholders should continue discussing opportunities to increase prescribed burning through better use of technology, including modelling software, traditional portable air quality monitoring, or newer low cost sensor technology.
3. Air districts, especially rural air districts with minimal staffing, should receive financial, equipment, and training support to allow for increased staffing as the use of prescribed fire increases.
4. Continued and expanded funding for woodsmoke reduction programs can reduce the daily emission load from home wood heating, which would allow for expanded prescribed burn windows.
5. Land managers and stakeholders should increase outreach to communities affected by wildfire and prescribed fire to increase public understanding and acceptance of prescribed fire.