Dear Tricia,

I am writing in regards to the development of the NAAQS SIP. For the past 5 years I have been working with other researchers to document fuel loading in forest communities in Arkansas. We have found fuel loading estimates to be much lower than default fuel loads used by such cover type classifications such as Fuel Characteristic Classification System (FCCS) and Society of American Foresters/Society of Range Management (SAF/SRM) which are used in many smoke emission models (like CONSUME and FOFEM (First Order Fire Effects Model)).

I am wondering if you could tell me what fuel loading estimates you are using or the EPA is using to predict smoke emissions in forest communities in Arkansas and what models are being used to make those predictions? This information is critical to emphasizing why our research on fuel loading in Arkansas is important.

Thanks,
Virginia