

**Response from Collin O'Mara to the House Committee on Energy and Commerce
Subcommittee on Environment
Hearing entitled "Air Quality Impacts of Wildfires: Mitigation and Management Strategies"
September 13, 2018**

Thank you again for the opportunity to testify, and for the additional questions you have posed. My answers are contained below.

1. What is necessary to increase the pace and scale of prescribed burning and other active forest management activities? More specifically what needs to happen at the Federal level vs State and local levels?

Funding, collaboration, and focus. Earlier this year Congress passed the Fire Fix that will ensure that, starting in fiscal year 2020, the Forest Service will no longer have to extinguish all resources from its forest management accounts to cover the increasing costs of fighting the larger, more numerous, and more intense forest fires being fueled by climate change. This was an extremely important step that Congress took and we thank all of the Members of this Committee who supported it and worked to enact it.

That said, we are extremely frustrated that the Fire Fix will not take effect until FY20, when it should have begun in the second half of FY18. Given the severity of fires we experienced in FY18 and what we're expecting for FY19, we urge this Committee to work with other committees of jurisdiction to begin the fire funding fix this year (FY19), rather than waiting for yet another year to begin restoration at-scale, while local communities suffer even more devastating health and economic impacts.

Further, the fire funding fix in and of itself is not enough. After years of starving the Forest Service budget combined with its own restoration budget cannibalization to fight fires, we urge Congress to follow through by making sure the Forest Service has sufficient funding on an annual basis to restore our National Forests to health and resilience, through forward-thinking restoration projects, prescribed burns, and other efforts. Such funding should at least be commensurate with the new wildfire disaster funds to be allocated for fighting wildfires, so we are reducing the long-term restoration deficit. Further, in out years, Congress should ensure that the Forest Service is spending the resources freed up by the fire funding fix on the restoration, reforestation, and proactive management.

More collaboration by the Forest Service with more partners will also increase the pace and scale of forest restoration projects. The more buy-in and local, regional, and national support the Forest Service has for its work, the more likely those projects are to move forward without controversy or pushback. The Forest Service's Shared Stewardship strategy released earlier this year sets it on the right course toward increased coordination with the full range of national forest stakeholders and the public. This strategy seeks to address fire at scale, and emphasizes and prioritized greater coordination with states in particular, and with other stakeholders. Congress should support the agency in implementing the shared strategy and provide funding as well as oversight to make sure the Forest Service stays on track and delivers forest restoration results.

A focus on restoration results will also be needed to increase the number of prescribed burns and other forest restoration projects. The Forest Service has plenty of policy and programmatic tools to restore the national forests, and now it has more funding available for this purpose thanks to Congressional action earlier this year. Some additional policy tools or flexibility from Congress might help around the edges but are not a priority right now, when the Forest Service has barely begun to implement the tools Congress recently provided this spring as part of the fire funding fix. Instead, the agency must make sure all of its forest restoration tools and authorities, and the restoration projects it is implementing on-the-ground through them, are actually focused on improving the resilience of forest ecosystems and on improving wildlife habitat and delivering results. The restoration work these authorities were set up to achieve is far too important, and the scale of restoration needed far too great, to allow any projects under these programs to focus on anything but restoring the health and resilience of our national forests. Yet there is a tendency for the Forest Service to prioritize generating receipts from the sale of commercially viable timber to cover costs over delivering restoration results. A commercial timber program is a legitimate and important use of the national forests, but seeking receipts through forest restoration programs and projects serves as a distracting and corrupting influence on those programs. Receipts from the sale of timber must be a byproduct of restoration projects, not an objective. The Forest Service therefore needs to measure the success of its forest restoration program in terms of community fire risk reduction, forest resilience, wildlife habitat, carbon storage, water quality, and other measurable results on the ground. Congress can help by providing oversight to make sure objective forest restoration results are being delivered irrespective of receipts generated. For example, Congress should make sure the restoration authorities it has provided the agency such as the Collaborative Forest Landscape Restoration Program, Stewardship Contracting, and Good Neighbor Authority are fulfilling their restoration purposes and not authorizing commercial timber sales except as necessary to achieve a specific restoration result.

2. Can you provide your perspective on whether more coordination among federal and state authorities is needed to make a meaningful difference in reducing the risks of catastrophic wildfires?

More—earlier and more strategic—coordination among federal and state authorities will lead to a meaningful difference in reducing the risk of catastrophic wildfires. The key will be to make sure the coordination is centered on the restoration of forest resilience, for example through prescribed burns, the removal of flammable understory, or the retention of mature fire resistant trees. Some steps the Forest Service could take to improve coordination with states include providing more oversight of the Good Neighbor Authority program to make sure projects under this authority are prioritizing restoration over receipts, and adopting policies or regulations making sure Stewardship Contracts are only signed for legitimate forest restoration projects.

3. Should air quality considerations play a greater role in informing decisions related to wildfire suppression and forestry management planning, and if so, how so?

Air quality considerations need to play a greater role in informing forest restoration projects. As I mentioned in my testimony, prescribed burns emit 10 times to 100 times less particulate matter than typical wildfires—and prescribed burns are one of the most important forest restoration and fire risk reduction strategies. The USFS and States already take precautions to reduce the health impacts from prescribed burns, such as establishing hourly and daily PM 2.5 limits, as well as specific plans to support at-risk populations. These plans should continue to be improved to

minimize further any potential health impacts from prescribed burns, but potential impacts should always be compared to the health consequences of inaction, which are often orders of magnitude greater as residents across the Northwest have experienced.

There are administrative actions that EPA can take to remove some of the disincentives for prescribed burns through both changes to implementation guidance and policy. The most important change is to eliminate the perverse incentive whereby emissions from prescribed burns (“anthropogenic ignition”) are included in the calculations to determine whether a state is in attainment of the National Ambient Air Quality Standards, but wildfires (“natural ignition”) are regularly excluded, despite typically emitting 90-99% more pollution. In other words, states that proactively utilize prescribed burns to reduce risks of megafires often need to find further reductions elsewhere in their state economy to offset the emissions from the prescribed burns; whereas a state that does not take such preventative action is not held accountable for the emissions from a megafire that could have been mitigated. Instead, we believe that EPA should account for all emissions and prioritize the granting of wildfire accounting exceptions to those states and communities who have ecologically-sound and landscape-scale fire programs and in doing so encouraging states to prioritize forest restoration, including prescribed burns, as a means of reducing overall emissions and adverse impacts to public health. We would glad to work with the Committee on this effort.