

**Testimony of Collin O'Mara  
President and CEO of the National Wildlife Federation  
Before the United States House of Representatives  
Committee on Energy and Commerce  
Subcommittee on Environment  
Hearing on Air Quality Impacts of Wildfires: Mitigation and Management Strategies  
September 13, 2018**

Thank you to Chairman Walden, Ranking Member Pallone, Subcommittee Chairman Shimkus, Ranking Member Tonko, and the members of this subcommittee for convening this important hearing on a critical issue facing our communities, public health, and wildlife.

My name is Collin O'Mara and I serve as the president and CEO of the National Wildlife Federation—America's largest conservation organization, comprised of 51 state and territorial affiliates and more than 6 million members who are committed to ensuring that wildlife thrive in our rapidly changing world. Prior to joining the Federation, I served as Secretary of Natural Resources and Environment for the State of Delaware, where I oversaw forest management efforts on Delaware's State Parks and State Wildlife Refuges, as well as coordinated with our State Forester on projects to improve the health of our State Forests.

Healthy forests underpin a healthy economy and help protect clean water, clean air, our climate, and essential ecosystems. Yet, the ability of our National Forests to do so has been jeopardized by inadequate restoration and management and escalating climate impacts, both of which exacerbate the threat and consequences of increasingly intense wildfires.

Across our country, wildlife and human communities are living alongside the threat of wildfire. For high-risk communities that have not burned, residents fear evacuation orders and the ominous red glow fire casts on the horizon. For those that have experienced modern megafires, they are rebuilding or helping neighbors recover — even as the threat of future fires looms.

Over the past three years, more than 25 million acres of U.S. forests have burned, including more than 10 million acres in both 2015 and 2017. We are on pace to near 10 million acres burned again this year with more than 8.1 million acres burned this year-to-date. Right now, [84 wildfires](#) are actively burning across 12 states from Alaska to Arizona, currently covering more than 1.4 million acres, posing significant risks to people, property, and wildlife. We honor the brave firefighters and offer our deepest condolences for those who have lost friends and family.

In our report issued last year, [Megafires: The Growing Risk to America's Forests, Communities, and Wildlife](#), the National Wildlife Federation demonstrated how these catastrophic fires are the leading edge of an emerging, tragic trend. Wildfires have been burning more intensely and frequently than in previous decades. These increasingly large, fast-spreading, intensely hot fires — fueled by decades of fuel loading, fire suppression efforts, and climatic changes like decreased precipitation, warming temperatures, and increased pest problems — have fundamentally altered the natural fire cycle and reduced the resilience of forest landscapes.

Wildfire is a natural, and even healthy, phenomenon for forests and wildlife habitat, but this new normal is anything but for millions of Americans and the forests central to our wildlife heritage.

Last year, we saw smoke so thick in places, like Missoula, Montana, and Los Angeles, California, that residents couldn't see across their front yards. Again today in Southern California, Eastern Oregon, and other states, children and the elderly are choking on smoke and need filters to simply breathe. These situations, particularly tragic for low-income families and those on fixed incomes, are becoming commonplace in our age of escalating megafires. The unhealthy levels of fine particulate matter (especially PM 2.5 and PM 10) and toxic fumes (such as heightened ozone levels caused by the reaction of oxides of nitrogen, volatile organic compounds, and carbon monoxide) exacerbate risks of asthma, pneumonia, and other respiratory and cardiac problems. In some cases, the increase in air pollution due to wildfires is [undermining years of progress](#) reducing air pollution from power plants, industrial facilities, and vehicles. Studies have shown that the annual carbon emissions released by U.S. wildfires can range from 160 million to 290 million tons, which is the equivalent of are equivalent to the emissions of 34-63 million passenger vehicles or 2-4% of total U.S. carbon emissions.

The National Wildlife Federation firmly believes that collaborative, science-based active restoration of our forests, including ecologically-sound controlled burns and mechanical treatments, is absolutely necessary to improve forest health. We believe providing sufficient funding, enhancing collaborative forest management, advancing ecologically-sound prescribed burns, acting on climate, and ensuring implementation oversight are all necessary components of a comprehensive strategy. Here are our specific recommendations:

### **Providing Sufficient Funding**

This March, Congress took a significant step forward to address the problem of wildfire by passing the fire funding fix. Unlike other disasters, such as hurricanes, wildfires have been ineligible for disaster assistance under the Stafford Act and thus the Forest Service has been forced to raid other accounts, such as forest restoration programs, to fund fire response activities. This ends up reducing the pace and scale of restoration efforts that could have otherwise reduced fire threats in future years. The fire funding fix adopted this spring eliminates this uncertainty by capping the amount of money that the Forest Service has to spend of fire response, before having access to emergency funding. This should free up significant resources for proactive forest restoration efforts in future years.

We at the National Wildlife Federation were proud to champion this effort alongside Members of both parties. Unfortunately, the funding component of the final compromise does not take effect until Fiscal Year 2020, which provides no funding relief for this year's catastrophic fires.

We urge Congress to fully fund and implement this common-sense strategy as soon as possible, while continuing to provide sufficient annual appropriations the federal land management agencies need to manage our forests and respond to wildfires.

## **Enhancing Collaborative Forest Management**

A flexible, collaborative decision-making process is key to minimizing the threat of megafires. The U.S. Forest Service recently released a new plan, “[Toward Shared Stewardship Across Landscapes: An Outcome-Based Investment Strategy](#),” for managing forests more effectively to reduce fire risks. Built upon the new funding and management tools Congress provided the agency alongside the fire funding fix, the Shared Stewardship strategy represents an important start to improving collaborative, landscape-scale management of our National Forests. That said, we also see greater opportunities for USFS to integrate climate-smart adaptation practices into all restoration projects that improve forest resilience, improve wildlife habitat, and increase carbon sequestration volumes.

Building upon the fire funding fix and additional tools provided by Congress to restore the resilience of our forests and reduce risks from future fires, the Farm Bill conference committee and the negotiators of the Interior Appropriations bill are currently considering additional proposals to improve collaborative forest management.

If Members want to explore additional tools, it is clear the best path forward is the bipartisan approach that resulted in Congress recently passing the fire funding fix. Promising proposals with potential bipartisan support include:

- Reauthorizing the Collaborative Forest Landscape Restoration Program.
- Adding lodgepole pine restoration projects in Fire Regime IV to the Healthy Forest Restoration Act categorical exclusion for priority projects, and to the list of projects that can receive the expedited, focused analysis of the proposed action, no action, and a possible third alternative.
- Reauthorizing appropriations to treat insect and disease infestations.
- Incentivizing forest management projects under the Good Neighbor Authority by ensuring receipts from any timber sold through these projects can contribute to covering the costs incurred by non-federal project partners, and that any receipts in excess of costs are available for the Forest Service to spend on other Good Neighbor Authority or other forest restoration projects on National Forests in the same state.
- Expanding Good Neighbor Authority to include Tribes and counties with sufficient capacity to conduct work in accordance with adopted forest management plans.
- Passing the Timber Innovation Program, currently in the Senate Farm Bill, to create new markets for wood byproducts from forest restoration projects.

## **Advancing Ecologically-Sound Prescribed Burns**

Though it may seem counter-intuitive, increasing prescribed burns is one of the most effective tools to improve forest health and reduce long-term adverse public health impacts, especially

when combined with strategic efforts to reduce fuel loads in ways that do not harm biodiversity. While some debate has emerged about the health tradeoffs of engaging in strategic prescribed burns as a key management strategy to mitigate long-term fire risks, studies have consistently shown that prescribed burns emit 10 times to 100 times less particulate matter than wildfires. USFS and States take significant 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, but it should not be lost that the health impacts of uncontrolled wildfires are on average 90-99% worse than prescribed burns.

We agree that funding, interagency collaboration, and insufficient capacity are the [most significant barriers](#) to increasing the utilization of prescribed burns—obstacles that the fire funding fix should help alleviate.

We do not believe that changes are necessary to the Clean Air Act to allow for more prescribed burns, but we do believe that EPA guidance and state-level policies could be more supportive and disincentives could be removed. For example, there is a 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. This is exactly backwards and unwittingly dis-incentivizes states from taking proactive measures to reduce risks of more-polluting megafires. Instead, 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.

Further, the federal government could play a much more proactive role in bringing stakeholders together to advance best practices to accelerate the adoption of prescribed burns. The USFS Shared Stewardship Strategy takes important steps in this direction and we are working with Secretary Perdue to implement its recommendations. In addition, states should be encouraged and incentivized to continue to improve their Smoke Management Plans and implement best practices that protect public health, such as flexibility for communities that take measures to protect vulnerable populations, while encouraging greater collaboration and resourcing to ensure that prescribed burns occur at appropriate times and scales.

### **Acting on Climate**

No conversation about improving forest health is complete without confronting the changing climatic conditions that are exacerbating megafires, especially less precipitation, drier soils and vegetation, and warmer temperatures. We urge Members to collaborate across party lines to advance bipartisan solutions that reduce greenhouse gas emissions through the accelerated adoption of land management practices that increase the carbon sequestration capacity of natural systems, like forests, grasslands and wetlands, as well as from fossil fuel sources through market-based mechanisms (e.g. price on carbon).

### **Ensuring Implementation Oversight**

Congress should prioritize making sure the Forest Service effectively utilizes the additional funding and management tools recently provided to USDA. The Committee should also ensure the agencies is applying the freed-up funding and policies in a climate-smart, wildlife-friendly manner that improves the resilience of forest habitats to disturbances and threats and simultaneously reduces overall adverse impacts to air quality.

### **Conclusion**

We appreciate the Committee focusing on identifying solutions that would reduce these health consequences of escalating megafires. We encourage the Committee to pursue the numerous bipartisan, science-based solutions that are within reach. We believe that a comprehensive approach, including providing sufficient funding, enhancing collaborative forest management, advancing ecologically-sound prescribed burns, acting on climate, and ensuring implementation oversight, will benefit people and wildlife alike. Thank you for the opportunity to testify on this critical issue.