NATIONAL ASSOCIATION OF STATE FORESTERS
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Written Testimony of the National Association of State Foresters (NASF)
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Hearing on the *Wildfire Emissions Prevention Act of 2025*
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The National Association of State Foresters (NASF) is pleased to provide written testimony to the Senate Committee on Environment and Public Works for this important hearing on the *Wildfire Emissions Prevention Act of 2025*. Thank you, Chairwoman Capito, Ranking Member Whitehouse, and members of the Committee, for holding this hearing today and for the opportunity to testify on behalf of NASF. We are also grateful to the bill's sponsors for bringing this critical legislation forward.

NASF represents the directors of the forestry agencies in all 50 states, five U.S. territories, three nations in compacts of free association with the U.S., and the District of Columbia. State foresters deliver technical and financial assistance to private landowners for the conservation of more than two-thirds of the nation's forests. As State Forester in Georgia and head of the Georgia Forestry Commission (GFC), I am responsible for the protection and conservation of Georgia's 24.2 million acres of forest resources through leadership, service and education. 88 percent of Georgia's forestland is privately owned and in 2024, forestry ranked first in salaries and wages, and second in jobs created in Georgia, with a total economic output of $42 billion.

All State Forestry Agencies share a common mission to protect America's forests and most have statutory responsibilities to provide wildland fire protection on all lands, public and private, and to reduce wildfire risk on those lands through tools such as prescribed fire. State Foresters also partner with federal land management agencies through cooperative agreements and Good Neighbor Authority to manage national forests and grasslands. Through resource sharing agreements we help suppress wildfires on federal lands and promote wildfire risk reduction through tools such as prescribed fire.

America's forests are one of the nation's greatest assets, both in terms of environmental importance as well as economic prosperity. Our nation has over 765 million acres of forest land, with the majority of those acres privately owned. As State Foresters, our role is to support the health and maintenance of forests of all ownerships and the benefits that society derives from them, but particularly to support private landowners in their management goals. However, those forests are under increasing pressure from a variety of threats, including catastrophic wildfires, forest pests and diseases, natural disasters, urbanization and conversion to other uses, and more.

Of particular note, wildfire risk is growing throughout the nation, from Georgia and West Virginia in the East to Utah, Arizona, and Wyoming in the West. The causes for this phenomenon may vary, but fire managers are seeing longer, more intense fire seasons in every corner of the country. Adding to the increased incidence of wildfire, we are also seeing more people living in the wildland-urban interface (WUI) - the area where human development,

including structures and other infrastructure, meets or intermixes with undeveloped wildlands. For example, 84 percent of Georgia's population resides in the WUI. This puts more people at risk and makes proactive risk mitigation activities harder to carry out.

In state fiscal year 2025, Georgia had 3,178 wildfires that burned over 21,760 acres - up 23 percent and 63 percent respectively over the five-year average. On March 1, 2025, we saw our highest single day wildfire total since spring 2011 with 133 fires. Total wildfires for March alone were 1,012. Despite challenges, GFC averages a response time of 26 minutes from initial report to attack, including nights, weekends and holidays, which contributes to Georgia's relatively small average fire size of five acres. Since 2020, we have saved 5,500 homes and outbuildings valued at $983.2 million. Simply put, aggressive wildfire response, alongside a robust, science-based prescribed fire program, create safer conditions for communities and wildland firefighters.

It is nearly universally agreed that a significant increase in prescribed fire and fuels treatments is needed to reduce wildfire threats and aid in ecosystem maintenance, restoration, and resilience across the country. The U.S. Department of Agriculture's Forest Service estimates a billion acres of land across America, across all ownerships, are at risk of catastrophic wildfires. Prescribed fire is a tool relied upon by natural resource professionals to reduce hazardous levels of vegetation that provide fuel for wildfires and promote fire adapted ecosystems by simulating natural wildfire disturbance through carefully planned and managed ignitions. Many forests are fire adapted ecosystems, relying on low intensity fires to help them regenerate and improve conditions for wildlife habitat and native plant species. Prescribed fire can help to reduce hazardous fuel loads and protect communities from catastrophic wildfire. It also minimizes the spread of forest pests, insects and disease, removes unwanted species that threaten our native ecosystems, provides forage and improved habitat for wildlife, recycles nutrients back into the soil, and promotes the growth of trees, wildflowers and other plants.

Most ecosystems in the United States evolved with fire, are fire-prone, and even need fire to sustain healthy conditions. We cannot suppress fire indefinitely, and doing so only increases the intensity and damage of a wildfire when it does start. Thus, for any forest, we can choose whether that fire comes in the form of planned prescribed fire or the eventuality of unplanned wildfire. When using prescribed fire, we are choosing to use best practices that minimize impacts on potentially affected populations. State Foresters have many tools in the toolbox for implementing prescribed fire effectively, whether burning themselves on state lands or supporting private landowners in prescribed burning. These tools include detailed burn plans with current weather forecasts and dispersion modeling that helps determine burn days. State Forestry Agencies' community outreach programs let populations know when there may be impacts from prescribed fire smoke.

For example, in Georgia we have a robust burn program with 3,821 certified burners and recently established a reciprocal program where we honor burn certifications from seven other states. GFC typically burns 10 percent of the total acres across the state. We are leveraging technology in the utilization of drones to conduct prescribed burns on just over 20,000 acres in state fiscal year 2025. Our drones burn an average of 595 acres per flight hour. The benefit of leveraging technology is burning more efficiently to lessen smoke impacts.

State Foresters are one of the leading advocates for wildfire risk reduction, especially the use of prescribed fire. NASF and the Coalition of Prescribed Fire Councils (CPFC) work collaboratively to produce the National Prescribed Fire Use Survey Report.[1] This report remains unique among prescribed fire surveys by evaluating state forestry agencies' prescribed fire policies and management of prescribed fire programs. This intelligence helps to track how much and where prescribed fire is implemented and to what effect. It also helps to track progress made toward increasing the scale and pace of prescribed fire to maintain and build resilient landscapes. The most recent report documents 9.4 million acres treated with prescribed fire annually, of which Georgia treated 1.5 million acres.

Since its inception in 2007, NASF has been a longstanding supporter of and partner with EPA in implementing the Exceptional Events Rule for Prescribed Fire. More broadly, we partner with EPA and State environmental agencies in many efforts that help protect communities from smoke. In our roles on wildfire response teams, we are responsible for daily briefings and smoke hazard communication to local communities. Outside of wildfire season, we proactively build relationships around smoke management.

As one example of this relationship building is the Albany, Georgia Pilot Project: Prescribed Fire and Air Quality. Approximately 400,000 acres are burned each year in the Albany Metropolitan Statistical Area, primarily during February and March. Recognizing the PM2.5 National Ambient Air Quality Standards (NAAQS) were being revised, partners initiated this pilot project to explore strategies for maintaining prescribed fire at scale while protecting air quality. In January 2025, the project was refined to emphasize burns upwind of the Albany population center, targeting the conditions most likely to affect monitored air quality. After this year's burn season, results were very promising with only one daily exceedance recorded that was traced to smoke drift from Columbus, GA, not a local prescribed burn. Overall burn acreage remained average, confirming that the project did not reduce burning opportunities. Partners in this project include private landowners, GFC, NGOs, Georgia Environmental Protection Department, EPA and other state and federal agencies. Their collaboration ensured both scientific credibility and broad community support.

These partnerships have significantly ramped up in the wake of the lowering of the PM2.5 NAAQS from 12 mg/m^3 to 9 mg/m^3 in 2024. This has put many areas of the country at risk of being out of attainment, with the resultant negative impacts on economic development. While there has been great progress across the country in lowering many sources of PM2.5, the increased wildfire risk discussed earlier in this testimony has meant that attainment challenges still exist in certain areas.

With the lowered PM2.5 NAAQS standard, NASF has been a proactive voice with EPA in making sure the tools and processes are in place for Exceptional Events demonstrations to proceed. We appreciate the tools EPA has released since the final rulemaking, including tools for data visualization, the PM2.5 Wildland Fire Exceptional Events Tiering Document, and the prescribed fire Exceptional Events demonstration from Nevada County, CA. However, the fact remains that the Nevada County, CA demonstration is the only one processed in the history of EPA, and we expect hundreds of demonstrations annually across the country due to the new

[1] https://www.stateforesters.org/wp-content/uploads/2023/01/2021-National-Rx-Fire-Use-Report_FINAL.pdf

lowered standard. In Georgia alone, 129 total Exceptional Event demonstrations were submitted for monitoring data captured between 2021 and 2023, with 89 of those events being prescribed fire demonstrations. EPA has yet to approve or deny any of those cases.

Specifically, we have asked the EPA to ensure that each EPA regional office issues clear guidance to state agencies on what documentation is needed for an Exceptional Events demonstration to be approved – ideally aligned across EPA regions – and establishes clear internal and external timelines for processing and approval of Exceptional Events demonstrations that adequately meet state data needs.

We believe there needs to be strong recognition that smoke from forest fires, whether they be wildfires or prescribed fire, is a natural part of ecosystem maintenance and should not factor into attainment decisions. With this in mind, we offer our full support for the *Wildfire Emissions Prevention Act of 2025*, which recognizes this exact reality, and gives EPA, the states and partners greater flexibility in following-through on EPA's long-standing position on the importance of prescribed fire.

The intent of the *Wildfire Emissions Prevention Act of 2025* to codify efforts by multiple Administrations to utilize the Exceptional Events demonstration process for prescribed fire is particularly important. In the wake of the recent Supreme Court ruling that courts cannot defer to agency interpretations of law, having clear Congressional intent and clarification for the Exceptional Events processes will be key going forward, especially if states are to navigate a policy environment with a lowered PM2.5 NAAQS.

We particularly appreciate that this bill would clarify Exceptional Events to include activities "intended to mirror the occurrence or reoccurrence of a natural event or the event is an action that mitigates wildfire risk". This definition recognizes both the critical need for wildfire risk reduction in forests across all ownerships, and that risk reduction through prescribed fire is mirroring the natural fire return interval and the resultant natural smoke and PM2.5 emissions that would occur in the absence of human intervention. Fire in our forests is not preventable in most areas of our country, nor should it be our goal to do so, and thus Clean Air Act policy should not be used to disincentivize science-based forest management that mimics natural fire return intervals.

Another key aspect of the *Wildfire Emissions Prevention Act of 2025* is the priority it places on engagement with states in EPA rulemaking directed by the bill. The Clean Air Act, at its heart, is a success story of cooperation between the federal government and the states, giving States the primary responsibility for implementing national air quality standards. The development of rules around Exceptional Events demonstrations for prescribed fire should be no different, with states retaining the implementation responsibility to submit demonstrations with the associated data and documentation. It only makes sense as best practice to include direct consultation with states - State Foresters, State air pollution control agencies, and State fish and wildlife agencies - in the rulemaking for this effort.

Thank you for the opportunity to appear before the committee today and provide testimony on behalf of NASF. We appreciate the ongoing work of this committee to provide federal and state

forest managers, as well as private landowners, with tools that increase the pace and scale of science-based, sustainable forest management, especially prescribed fire. NASF looks forward to working with the committee and EPA to ensure that federal policy around prescribed fire is robust and science-based, but also streamlined and efficient in implementation.

I look forward to answering any questions the Committee may have.