



MEGAFIRE ACTION

October 21, 2025

The Honorable John Boozman
Chairman, Senate Committee on
Agriculture, Nutrition, & Forestry
United States Senate
555 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Amy Klobuchar
Ranking Member, Senate Committee on
Agriculture, Nutrition, & Forestry
United States Senate
425 Dirksen Senate Office Building
Washington, DC 20510

cc: Members of the Senate Committee on Agriculture, Nutrition, & Forestry.

Dear Chairman Boozman, Ranking Member Klobuchar, and members of the Senate Committee on Agriculture, Nutrition, & Forestry:

On behalf of Megafire Action—a non-profit organization committed to ending the megafire crisis through a holistic approach to land management, wildfire response, and community resilience—we write in support of S. 1462 the Fix Our Forests Act.

Decades of fire suppression with inattentive land management, expansion of poorly planned development in the Wildland Urban Interface (WUI), and the accelerating effects of climate change have created a megafire crisis across the United States. Catastrophic megafires—distinguished by their extreme intensity, rapid spread, and large-scale destruction—are no longer anomalies but a persistent national emergency. These fires threaten human lives, destroy homes and critical infrastructure, and reshape ecosystems in ways that may be irreversible. Their impact extends beyond burned landscapes and communities; wildfires release massive amounts of carbon into the atmosphere, exacerbating climate change and contributing to long-term environmental degradation that fuels ever greater wildfires in a viscous feedback loop.¹ We are running out of time to prevent widespread devastation to communities, ecosystems, and the climate, and legislative action is needed now more than ever.

At its core, the Fix Our Forests Act tackles four key challenges: planning, permitting reform, technology adoption for improved decision making, and building community resilience—all essential to scaling up effective wildfire mitigation.

¹ Kaitlyn Thayer, James MacCarthy “5 Graphics Explain the Climate-Fire Feedback Loop.” World Resources Institute. <https://www.wri.org/insights/climate-fire-feedback-loop-explained>



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While this legislation will not resolve the long-standing workforce and budget constraints that have plagued wildfire mitigation and response for decades, it represents a critical and necessary step toward a more proactive and science-driven approach to wildfire management. We cannot ignore the fact that firefighters continue to be put in impossible positions—and our federal fighters in particular have been asked to do too much, with too little, for too long. Aside from passage of the Fix Our Forests Act, a permanent and well-resourced federal wildfire workforce remains an urgent need.

The Fix Our Forests Act directly addresses key hurdles that are worth solving on their own, removing bureaucratic roadblocks that slow down essential forest restoration and community mitigation projects, integrating cutting-edge technology to modernize wildfire decision-making, and building wildfire resilience directly in threatened communities. In short, this legislation will make it easier for the federal wildfire workforce to do the critical work that keeps us safe. This legislation will also make it easier for state, Tribal, and community-based workforces to do their own critical work on both federal and nonfederal lands. By prioritizing landscape restoration and improving coordination across agencies and communities, this legislation lays the foundation for all hands to create a more resilient future, even as broader challenges remain.

The bipartisan, good faith negotiating process in the Senate led by Senators Curtis, Padilla, Hickenlooper, and Sheehy has resulted in legislation with the potential to significantly enhance landscape resilience and wildfire mitigation efforts. **Megafire Action is proud to support and endorse this legislation.**

Wildfire Resilience Projects Benefit the Environment

Tackling climate change must mean addressing the megafire crisis. FOFA is an important step forward to confront this growing challenge.

Megafires are major contributors to rising global emissions, in 2023 alone Canadian wildfires emitted enough carbon to put it on par with the fossil fuel emissions of India.² Unnaturally extreme megafires are burning through boreal forests faster than they can regrow, threatening to turn a critical natural carbon sink into a carbon emitter.³ Addressing climate change must include addressing the megafire crisis, FOFA is an important step forward in doing so. Opponents have argued that the Fix Our Forests Act would stifle

² Byrne, B., Liu, J., Bowman, K.W. *et al.* Carbon emissions from the 2023 Canadian wildfires. *Nature* 633, 835–839 (2024). <https://doi.org/10.1038/s41586-024-07878-z>

³ Manuela Andreoni, “Canada’s Wildfires Were a Top Global Emitter Last Year, Study Says.” *New York Times*. <https://www.nytimes.com/2024/08/28/climate/canada-wildfires-emissions-carbon.html>



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public input, roll back environmental protections and remove science from land management. **These arguments are simply false.**

The Fix Our Forests Act appropriately balances the importance of community engagement and environmental review with the need to dramatically increase the pace and scale at which we reduce wildfire risk on public lands through active management. Section 106 expands four already existing categorical exclusions: the insect and disease, hazardous fuel, sage grouse, and the fuel breaks CE. For all of these CEs some form of public notice, scoping, or collaboration is already enshrined within statute. Section 105 builds community input into firehatched assessments requiring the secretary to coordinate with states, Tribes, and local governments on firehatched assessments and must provide opportunities for the public to participate in these assessments. Finally, Section 105 also requires the use of the best available science for firehatched assessments.

Scientific evidence shows that streamlining forest management as envisioned under the Fix Our Forests Act would not only build wildfire resilience but also directly mitigate future droughts, leading to less fire-prone conditions and less ecological and community damage overall.⁴

Increased active land and fire management results in critical ecological benefits.

Those in opposition to the proactive land and forest management that FOFA would enable commonly argue that treatments don't work in practice because wildfires rarely encounter a treatment. While this was certainly a true statement in the past, both wildfires and treatments have become much more common in recent years, meaning it is now much more common for wildfires to burn into the footprint of past treatments. For example, the State of California has launched a dashboard to track instances of wildfires encountering treatment footprints and to record observations from firefighters on how the treatments did or did not impact the wildfire.⁵ In just the last year in California, 61 wildfires burned into 100 treatments and 79% of the treatments were reported to have had a positive impact on the wildfire.⁶

More and more wildfires burning into past treatment footprints have provided many opportunities for scientists to rigorously study the real-world effectiveness of proactive management treatments. An analysis of 40 peer-reviewed scientific papers published since

⁴ Boardman, E. N., Duan, Z., Wigmosta, M. S., Flake, S. W., Sloggy, M. R., Tarricone, J., & Harpold, A. A. (2025). Restoring historic forest disturbance frequency would partially mitigate droughts in the central Sierra Nevada mountains. *Water Resources Research*, 61, e2024WR039227. <https://doi.org/10.1029/2024WR039227>

⁵ "New CAL FIRE Dashboard Shows Effectiveness of Fuels Treatments." California Wildfire & Forest Resilience Task Force. <https://wildfiretaskforce.org/new-cal-fire-dashboard-shows-effectiveness-of-fuels-treatments/>

⁶ "Fuels Treatment Effectiveness Reporting." CAL FIRE. <https://experience.arcgis.com/experience/91ab6b7f0b414d0ea06bf269a4632e15/page/Treatment-Reporting-Overview/>



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2000 have collectively found that when wildfires burned into areas previously treated with a combination of selective thinning and prescribed fire, the severity of those subsequent wildfires were reduced by up to 70% in conifer forests across the Western US.⁷ When wildfires burned into areas recently treated with prescribed fire during the 2020 California wildfire season, the severity of those wildfires dropped by 16% resulting in a net reduction of 14% in smoke emissions when also accounting for the emission of the prescribed fires.⁸

Many studies modeling the likely future conditions under a changing climate have found that expanding the use of beneficial fire and other active management treatments over the next few decades could provide for better environmental outcomes than would be expected if we continued with our current status quo of practices. Studies have found that expanding proactive forest management above current levels could result in:

- **Watershed benefits** by increasing streamflows by as much as 14%⁹
- **Wildfire benefits** by fully offsetting the expected increase in wildfire intensity due to climate change¹⁰
- **Endangered species benefits** by saving at least half of the critical habitat for the Sierra Nevada fisher that is expected to be lost due to climate change¹¹
- **Air quality benefits** by reducing PM_{2.5} emissions by 655,000 metric tons over the next 5 years in California alone¹².

Additionally, Section 301 of FOFA catalyzes advancements and innovations in creating and utilizing biochar. Biochar is carbonized biomass produced by converting feedstock through reductive thermal processing for a nonfuel use. This biochar demonstration project will help build the bioeconomy, reduce fuels in our forests, and prioritize projects that improve forest health, and capture and sequester carbon.

FOFA is evidence based legislation and strengthens how we incorporate science into land and fire management.

⁷ Davis et. al., 2024. "Tamm Review: A Meta-Analysis of Thinning, Prescribed Fire, and Wildfire Effects on Subsequent Wildfire Severity in Conifer Dominated Forests of the Western US." *Forest Ecology and Management* 561: 121885. <https://doi.org/10.1016/j.foreco.2024.121885>

⁸ Kelp, et. al., 2025. "Effect of Recent Prescribed Burning and Land Management on Wildfire Burn Severity and Smoke Emissions in the Western United States." *AGU Advances* 6 (3). <https://doi.org/10.1029/2025AV001682>.

⁹ Boardman et. al., (2025). "Restoring historic forest disturbance frequency would partially mitigate droughts in the central Sierra Nevada mountains." *WaterResources Research*, 61,e2024WR039227. <https://doi.org/10.1029/2024WR039227>

¹⁰ Brown et. al., 2025. "The Potential for Fuel Reduction to Reduce Wildfire Intensity in a Warming California." *Environmental Research Letters* 20 (2): 024040. <https://doi.org/10.1088/1748-9326/adab86>.

¹¹ Jones et al. 2025. "Collapse and Restoration of Mature Forest Habitat in California." *Biological Conservation* 308: 111241. <https://doi.org/10.1016/j.biocon.2025.111241>.

¹² Kelp, et. al., 2025. "Effect of Recent Prescribed Burning and Land Management on Wildfire Burn Severity and Smoke Emissions in the Western United States." *AGU Advances* 6 (3). <https://doi.org/10.1029/2025AV001682>.



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FOFA would enable more science-informed management and mitigation with real-time analytical services, comprehensively modeling wildfire, consolidating air quality data and establishing information systems accessible to federal, state, local and Tribal governments. Thoughtfully deploying more beneficial fire and active management projects can promote the environmental outcomes we want while avoiding harmful outcomes we don't want. If we choose to expand this proactive approach we can create a better environmental future than would be expected if we don't change the current status quo.

Opponents have falsely claimed that FOFA will make it easier to ramp up large-scale logging. This argument—again—is simply not true. The Fireshed Management Projects under FOFA promote wildfire mitigation, building resilience, and landscape restoration, not logging. Not once does the Senate bill mention commercial logging, additionally the Senate bill has added additional guardrails on the administration's use of emergency authorities by tying them to projects with a land management benefit and codifying Biden-era regulations on their use.

FOFA Builds Community Resilience

FOFA takes inspiration from the landmark 2023 Wildfire Mitigation and Management Commission Report, to establish a Community Wildfire Risk Reduction Program (CWRRP) to support interagency coordination.¹³ The program would advance research and science, support local adoption of codes and standards, support local efforts to address wildfire impacts including property damage as well as air and water quality, encourage public-private partnerships for fuel reduction work, and provide technical and financial assistance to communities.

Additionally, Section 201 explicitly incorporates support for fire-resistant building methods, codes, and standards, including ignition-resistant construction, retrofitting, and defensible space, guided by the best available science. These additions are crucial for addressing fire risks in the built environment, making this section inclusive of the kind of urban firestorms seen in Los Angeles in January, 2025. Section 201 strengthens interagency coordination by requiring annual meetings, budgeting alignment, and integration of wildfire mitigation into existing federal programs. It encourages the development of early wildfire detection and community alert systems and requires the program to seek feedback from states, Tribes, local governments, and other stakeholders, and produce a comprehensive biennial report.

Section 203 introduces critical transparency and oversight mechanisms for the CWRRP through a report to Congress. Section 204 and 205 build on the success of the Community

¹³ "On Fire: The Report of the Wildland Fire Mitigation and Management Commission."
<https://www.usda.gov/sites/default/files/documents/wfmmc-final-report-09-2023.pdf>



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Wildfire Defense Grant Program. Key improvements to the CWDG program include allowing eligible applications for infrastructure hardening activities and deployment of wildfire technologies deemed successful under the Sec. 303 pilot program. Additionally, CWDGs no longer require a CWPP, a key barrier for many communities including Los Angeles. Section 205 updates the definition of at-risk community to include at risk from wildfire as recognized in a fireshed, State, Tribal, local, regional, territorial, or national wildfire risk assessment and communities inside of or within five miles of a Wildfire Crisis Strategy landscape.

FOFA Cuts Red Tape to Build Wildfire Resilience

Categorical exclusions (CE) are one tool that have been used by land managers to get urgently needed projects to the ground more quickly and cheaply.

FOFA Section 106 paves the way for increasing the pace and scale of fireshed management by increasing categorical exclusions for wildfire resilience projects from 3,000 to 10,000 acres. CEs are a National Environmental Policy Act (NEPA) determination that certain proposed actions (such as a critical fuels reduction project) do not require lengthier Environmental Assessments (EA) or Environmental Impact Statements (EIS). This limitation expansion to 10,000 acres provides the flexibility to do critical work on the highest risk areas *before* areas succumb to megafire. As mentioned previously in this letter, all of these CEs already have some form of public notice, scoping, or collaboration enshrined within their base statute—not regulation.

To reduce the risk that CEs will be used for imprudent projects that harm forests or fail to reduce wildfire risk, projects must first be identified by a fireshed assessment that complies with applicable forest plans developed with community input, the best available science, Tribal knowledge, and local participation before the project can be eligible for a 10,000 acre CE.

In assessing the potential benefits of 10,000 acre CEs, we lean on practitioner perspectives. Our advisory board member Kelly Martin—Retired Chief of Fire and Aviation at Yosemite National Park and Prescribed Fire Burn Boss—had the following to say about Categorical Exclusions:

“Categorical exclusions (CE) are a key tool for forest resilience and wildfire mitigation. Currently, there is an over-allocation of funding and human capital dedicated to planning and revising existing NEPA Environmental Impact Statement (EIS) or Environmental Assessment (EA) documents sometimes 5 to 10 years in the making. This favors what seems like endless and duplicative planning efforts compared to implementing beneficial actions on the ground that we know are based on solid science and research. CEs help



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us streamline the public review process and start putting meaningful projects on the ground faster to meet existential wildfire threats.

Unfortunately, projects done under the current 3,000 acre CEs fall woefully short of what is needed to meet the ever increasing size of contemporary wildfires. Smaller CEs often don't provide the buffer or resiliency needed to change conditions on the ground at a meaningful scale. In contrast, the value of a 10,000 acre CE is that you're not just looking at small sections, you're starting to look at the entire landscape and how it can withstand future challenges to watersheds, biodiversity, and key ecosystem services we deeply care about.

A common mindset around CEs is that they represent a rollback of environmental protections, but CEs are really about accelerating the implementation process for projects that have already been vetted and approved in existing land management plans backed by an EIS or EA. CEs are nothing new, they've been an important part of public engagement and meaningful land management actions for years. The CE reduces planning and analysis tiered to existing EISs and EAs and reduces the need for a redundant round of review for each specific project. This is not about returning to clear cut logging, going into sensitive areas, or removing mature growth old timber. We're talking about targeting areas that are accessible, where intervention can make a meaningful difference to landscape resilience. While forestry in the past, particularly in the early 1900s, often led to negative outcomes, those earlier mistakes should not cloud the judgment of today's forest management strategies, which are vastly more informed by modern science. We're not going back to those days."

While much of the policy focus on permitting reform has centered on landscape-scale fuels treatments in forested environments, fuelbreak projects in chaparral and mixed landscapes directly neighboring communities face many of the same bureaucratic hurdles. FOFA makes a difference in these ecosystems as well, by streamlining environmental review processes for critical wildfire mitigation projects, including fuelbreak maintenance.

A case in point is the Angeles National Forest, which itself burned in the Eaton Fire. The Forestwide Fuelbreak Maintenance Strategy, an 8,685-acre project, initially began as an Environmental Assessment in 2020 but faced significant delays.¹⁴ Recognizing the urgency, land managers shifted to using multiple Categorical Exclusions (CEs) to expedite approval. These exclusions were ultimately granted in November 2023, allowing work to begin in 2024—four years after the project was first proposed.¹⁵ This example underscores the

¹⁴ "Schedule of Proposed Action, 01/01/2025 to 03/31/2025, Angeles National Forest." United States Forest Service. <https://www.fs.usda.gov/sopa/components/reports/sopa-110501-2025-01.pdf>

¹⁵ Ibid.



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importance of permitting reform in ensuring that fire mitigation efforts are not stalled by bureaucratic red tape. By making it easier to approve and implement these projects, the Fix Our Forests Act helps improve wildfire preparedness and resilience, not just in conifer forests but across a range of fire-prone landscapes, including the chaparral of Southern California.

FOFA Leverages Cutting Edge Technology

FOFA Establishes the Wildfire Intelligence Center.

Section 102 of the Fix Our Forests Act would establish a Wildfire Intelligence Center to provide technologically-enabled decision support across the entire wildfire lifecycle of prevention, suppression, and recovery efforts. The recent landmark Wildland Fire Mitigation and Management Commission Report called for such a Center to leverage cutting edge technology and improve the interoperability and effectiveness of the many entities engaged in wildfire work.¹⁶

Wildfires burn across jurisdictional lines, necessitating cooperation between local, state, Tribal, and federal agencies, as well as the private sector. The complexity of wildfire management across natural landscapes and the built environment demands a coordinated approach that ensures resources, expertise, and decision-making processes are effectively aligned to mitigate risk and improve response efforts. Whether it's a local fire station, community-led prescribed burn association, the National Park Service, Forest Service Hotshots, Tribes, or public health departments, every organization should have real-time access to the best weather modeling, fire-spread and smoke modeling, fire and fuel treatment history, and common operating pictures available so they can plan effectively, operate safely, and collaborate across jurisdictions.

The Wildfire Intelligence Center will help break down silos and create the coordinated, whole-of-government response necessary to reduce the devastation caused by megafires. In addition to this, the Center would:

- Provide decision support for the pre-positioning of wildfire suppression personnel and assets based on real-time risk, a key issue in the Palisades Fire.¹⁷
- Aid with the creation and updating of Community Wildfire Protection Plans.
- Assist with the safe and effective use of prescribed fire to help prevent catastrophes like the Hermit's Peak/Calf Canyon fire.¹⁸

¹⁶ "On Fire: The Report of the Wildland Fire Mitigation and Management Commission."

<https://www.usda.gov/sites/default/files/documents/wfmmc-final-report-09-2023.pdf>

¹⁷ Alene Tchekmedyan, Dakota Smith and Hannah Fry, "With a forecast of dangerous winds, LAFD pre-deploys to avoid failings of Palisades fire." LA Times. <https://www.latimes.com/california/story/2025-01-20/lafd>

¹⁸ "Report to the Ranking Member, Subcommittee on Indian and Insular Affairs, Committee on Natural Resources, House of Representatives." United States Government Accountability Office. <https://www.gao.gov/products/gao-24-106239>



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- Leverage commercially available technologies, where available, to perform the functions of the Center so we get up and running quickly.
- Manage the Section 303 wildfire technology demonstration pilot program and streamline procurement processes for firetech.

Currently, inadequate data integration and decision support for fire and land management agencies result in precious resources being spent on scattered, uncoordinated efforts—often referred to as “random acts of restoration.” By centralizing data collection while broadening data access, providing advanced wildfire risk assessments, and supporting decision-making across multiple agencies and jurisdictions, the Wildfire Intelligence Center would improve coordination in wildfire mitigation as well. This is more than just an administrative function—it is a force multiplier. To meet our restoration and wildfire mitigation goals effectively, we must move beyond reactive strategies and fully leverage the power of data and technology.

FOFA scales wildfire technology for the future.

Section 303 of FOFA creates a multi-agency public-private wildfire technology testbed program that identifies and advances key emerging technologies in a competitive pilot program. This provision is a substantial step forward in getting critical new technologies in the hands of those who desperately need them, when they need them. Scaling these solutions as quickly as possible is key to meeting the emergency we are in—we do not have the luxury of continuing R&D and pilots forever. Existing deployments of innovative wildfire technologies have demonstrated their ability to increase the effectiveness of taxpayer-funded programs and are ready to scale nationwide. The Wildfire Intelligence Center will coordinate with the technology pilot program established in Sec. 303 and streamline procurement processes for wildfire technologies, with the aim of getting these technologies past the demonstration phase and into the hands of operators across the country, regardless of agency.

FOFA Bolsters Public Input & Modernizes Legal Review

Section 121 of FOFA primarily reinforces current law and practice regarding the Administrative Procedures Act, and identifies commonsense considerations in judicial review that courts are already likely to consider. The section identifies issues for courts to assess in analyzing whether an order to stop a project is within the public interest. This is a longstanding legal standard for those orders. The public interest considerations underscore the value that wildfire mitigation projects provide for communities and ecosystems – but the section makes clear that these considerations are not the only factors that courts should consider.

The litigation provisions are specific to fireshed management projects, Section 2 of the bill defines these projects. The Section 2 definition includes forest and vegetation management



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projects to reduce hazardous fuels, create fuel breaks, address insects and disease, among other project types. The USFS replied in its questions for the record to the Senate Agriculture Committee regarding FOFA that only 84 project decisions signed in fiscal years 2015-2024 that were litigated had “Hazardous Fuels Management” cited as a project purpose.¹⁹ For context, USFS estimates that it conducts more than 5,000 hazardous fuels projects on more than 2 million acres every year. Meaning that if USFS averages 5,000 fuels projects each year from 2015-2024, the litigated projects would be 0.168% of total projects.

The Senate FOFA bill significantly improved upon the House language regarding community access to the courts. The Senate bill provides opportunities for community engagement with public participation in Fireshed Assessments, and ensures that public comment is not required in order to have standing in the courts. Additionally, the Senate bill’s statute of limitations at 150 days is an increase from the House bill’s 120 days. For context, the USFS QFRs stated that 43% of lawsuits on hazardous fuels reduction projects over the past decade were filed within 150 days.²⁰ Meaning nearly half of all lawsuits on hazardous fuels reductions projects are *already* being filed within 150 days.

FOFA is a powerful step forward, and in this urgent moment, moving forward toward ending the megafire crisis is exactly what we need. FOFA represents months of negotiations, input from stakeholders across the country and ideological spectrum, and countless hours of technical and substantive work. We thank Chairman Boozman, Ranking Member Klobuchar, members of the Senate Committee on Agriculture, Nutrition, and Forestry and the sponsors of FOFA for their time and work put into this legislation.

We would encourage every Senator to recognize the urgency and the need for this commonsense and bipartisan legislation and to support the Fix Our Forests Act.

Please feel free to contact our Director of Federal Affairs & Strategic Counsel, James Campbell at James@megafire.org with any further questions.

Sincerely,

Matt Weiner
Founder and CEO, Megafire Action

¹⁹ “Legislative Hearing to Review S. 1462, Fix our Forests Act.” Committee on Agriculture, Nutrition, and Forestry. https://www.agriculture.senate.gov/imo/media/doc/e205365e-e545-358f-0b12-62d497c99ac7/S.HRG.119-74_TRANSCRIPT.pdf

²⁰ Ibid.