



November 25, 2020

The Honorable Lisa Murkowski
 Chair, Appropriations Subcommittee on
 Interior, Environment and Related Agencies
 U.S. Senate
 Washington, DC 20510

The Honorable Betty McCollum
 Chair, Appropriations Subcommittee on
 Interior, Environment and Related Agencies
 U.S. House of Representatives
 Washington, DC 20515

The Honorable Tom Udall
 Ranking Member, Appropriations
 Subcommittee on Interior, Environment and
 Related Agencies
 U.S. Senate
 Washington, DC 20510

The Honorable David Joyce
 Ranking Member, Appropriations
 Subcommittee on Interior, Environment and
 Related Agencies
 U.S. House of Representatives
 Washington, DC 20515

Dear Chairwomen Murkowski and McCollum, and Ranking Members Udall and Joyce,

The National Association of State Foresters (NASF) writes to you today in response to language within Title III of the Senate draft Appropriations bill for the Department of the Interior, Environment and Related Agencies for fiscal year 2021. Specifically, we are writing about the Congressional direction under “Administrative Provisions—Forest Service” to “create a Deputy Chief for Fire and Aviation to administer the Wildland Fire Management appropriation.”

While we agree more must be done to minimize the threat of catastrophic wildfire, we are concerned the prospect of establishing a Deputy Chief for Fire and Aviation would divert valuable resources and priorities from land management activities that reduce the threat of wildfire, only to establish additional overhead and bureaucracy around wildfire suppression. Fire threats are best addressed by a holistic all-lands approach to fire response and proactive forest management across federal, state, and private lands. The existing structure of USDA Forest Service State & Private Forestry, including the partnership with state foresters, is the best place for additional investment to address these threats, and the appropriate Deputy Chief area to house Fire and Aviation Management.

NASF represents the directors of the forestry agencies in all 50 states, eight U.S. territories, 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. They also partner with federal land management agencies through cooperative agreements and Good Neighbor Authority to manage national forests and grasslands. 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.

State forestry agencies contribute a significant portion of the overall wildland fire suppression effort nationally in terms of resources, personnel, capacity, and funds. Collectively, States reported spending \$1.9 billion on fire suppression, prevention, and mitigation in 2018, with \$1.4 billion spent on suppression alone. The overall federal cost of fire suppression for 2018 was \$3.1 billion. In 2018, there were 8,080 State personnel (including overhead and crews) mobilized through the National Interagency Coordination

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 Jay Farrell

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Center. Of those State personnel, 6,026, or nearly 75%, were mobilized to federal wildfires.¹ State forestry agencies also provide local governments and volunteer fire departments with access to fire and emergency response resources, which in 2018, included 93,656 firefighters, 91,940 fire engines, 2,851 dozers, and 620 aircraft. Additionally, State forestry agencies provide wildland fire training to over 57,000 local fire department personnel each year.

Collectively, state foresters are responsible for wildfire protection on more than 1.5 billion acres nationwide, including 1.1 billion acres in state and private ownership. In 2019, state and local firefighters were the first responders to nearly 80% of wildfires, regardless of jurisdiction. Given this and the major role played by state and local entities, maintaining Fire and Aviation Management within State & Private Forestry is crucial to ensure policies remain aligned for wildfire response as well as programs supporting state and local partner's cross-boundary work. With more people living in fire-prone landscapes close to wildlands, protecting state, private, and federal lands as well as communities, from wildfire has become increasingly difficult. Without increased and coordinated efforts in active forest management, wildfires will continue to pose a threat to our nation's forests, and destroy cherished communities.

Establishing a Deputy Chief for Fire and Aviation is tantamount to building a "fire agency" and would seem contrary to the intent of the "Wildfire Funding Fix" created in order to free up funding for more active management. Wildfire management is inherently a partnership effort between federal, state, local and volunteer agencies and departments. It is critical that State Foresters maintain alignment with the Forest Service on wildfire policy, and we think this is best done by maintaining Fire and Aviation Management within the State and Private Forestry. Decoupling wildfire management from State and Private Forestry could disrupt the work towards the goals of the National Cohesive Wildland Fire Management Strategy, which aligns with the current structure in looking at the interrelatedness of wildfire response and creating resilient landscapes and fire adapted communities through management. It is imperative that wildfire response and land management remain integrated within State & Private Forestry as state forestry agencies and the Forest Service coordinate our shared interests in responding to wildfire, improving forest health and reducing wildfire risk.

Additional targeted investment in existing USDA Forest Service programs would be more effective at mitigating threats of wildfire than creating an expensive new administrative silo that would divert valuable resources toward fighting solely a symptom of the problem. We must not repeat mistakes of the past and put primary focus on wildfire suppression, but instead we must also focus on the preventive work we can do to reduce fuel loads—and increase the pace and scale of active forest management.

We respectfully urge you omit the language directing the Forest Service to create a Deputy Chief for Fire and Aviation from the final Department of Interior appropriations bill for fiscal year 2021.

Sincerely,



Joe Fox
NASF President
Arkansas State Forester

¹ Statistics posted above were gathered from the Interagency Fire and Aviation Management Web Applications (FAMWEB) system, which includes the Situation Report and Incident Status Summary (ICS-209) programs. The statistics presented here are intended to provide a national perspective of annual fire activity but may not reflect official figures for a specific agency.