



The Honorable Lisa Murkowski  
 Chairman, Appropriations Subcommittee on  
 Interior, Environment and Related Agencies  
 U.S. Senate  
 Washington, DC 20515

The Honorable Betty McCollum  
 Chairman, Appropriations Subcommittee on  
 Interior, Environment and Related Agencies  
 U.S. House of Representatives  
 Washington, DC 20510

The Honorable Tom Udall  
 Ranking Member, Appropriations Subcommittee  
 on Interior, Environment and Related Agencies  
 U.S. Senate  
 Washington, DC 20515

The Honorable David Joyce  
 Ranking Member, Appropriations Subcommittee  
 on Interior, Environment and Related Agencies  
 U.S. House of Representatives  
 Washington, DC 20510

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The National Association of State Foresters (NASF) is composed of the directors of forestry agencies in the 50 states, eight territories and the District of Columbia. State foresters deliver technical and financial assistance, along with forest health, water and wildfire protection for more than two-thirds of the nation’s 751 million acres of forests. The USDA Forest Service (Forest Service) State and Private Forestry (S&PF) budget account provides vital support to deliver these services, which contribute to the socioeconomic and environmental health of rural and urban communities.

On behalf of the nation’s 59 state and territorial foresters and their 100-year old association, and as a career-long partner of the Forest Service myself, I offer the following comments on the agency’s proposed, “Budget Structure Reform Effort,” as presented in a special exhibit in the FY2020 agency Budget Justification. While state foresters support the agency’s effort to increase transparency in the overall budget process as directed by Congress, we have concerns with some of the reforms in this proposal, particularly the proposed changes to consolidate codified budget line items (BLI) within the S&PF mission area. The suite of S&PF programs operate across boundaries, each program leveraging the work of the others, to improve conditions for over 68 percent of the forested acres in the US. The existing format works well, and we question how performance will be measured if the S&PF programs are consolidated as proposed. As such, we propose the S&PF treasury account retain its current identity within the Forest Service budget.

**Concerns with the Proposed Changes to State and Private Forestry**

The ability of the States to leverage the federal dollars appropriated to S&PF programs through the Cooperative Forestry Assistance Act, greatly enhances the effectiveness of these programs. The proposal to consolidate three S&PF programs (Forest Stewardship<sup>1</sup>, Forest Health Cooperative Lands, and Landscape Scale Restoration) into a single BLI is concerning for the following reasons:

- The proposed name of the BLI, “State and Private Assistance” within the State and Private Forestry treasury account is too similar and may result in reduced clarity in communications and advocacy efforts.
- The Forest Stewardship and Forest Health Cooperative Lands program funds are distributed through formula allocation, for which reliability is very important to state foresters. We have concerns with consolidating these

<sup>1</sup>The President’s Budget Proposed renaming this program Working Forest Lands

two programs with the Landscape Scale Restoration program (LSR), which distributes funding through a competitive grant process.

- These three codified programs have their own individual purposes, and consolidating them into a single BLI risks the possibility of losing their individual identity. While we appreciate the intent to increase flexibility, we have concerns that without well-defined performance measures in place to ensure accountability, this proposal would actually reduce budget transparency and the ability to track results on the ground.
- Forest Health has operated as a cross boundary program with a Federal Land and Cooperative-Lands component in recognition that forest pests, and insects and disease know no bounds and a collaborative, cross boundary approach is necessary for successful preventative work and mitigating the spread of established pests, insects and disease. This proposal decouples the Federal Land and Cooperative Lands components, “burying” the Federal Lands component within the larger consolidated “Vegetation, Fuels and Landscape Management” BLI. The critical work accomplished by these programs, in our view, should remain distinctly represented with individual BLI’s and retain their current identity in the Forest Service budget.

State foresters also have reservations about the proposed S&PF account lacking a dedicated BLI for “Permanent Salaries and Benefits.” We have concerns this reduces the significance and importance of the S&PF programs. We think these programs deserve the same representation of “Permanent Salaries and Benefits” and would benefit from similar overhead transparency as the other proposed treasury accounts- General Management, Landscape Management, and Wildfire Management.

### **Concerns with Proposed Changes to Forest and Rangeland Research**

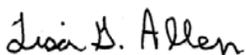
State foresters have concerns with Forest and Rangeland Research (R&D) losing its individual BLI and being incorporated into the proposed consolidated BLI, “Vegetation, Fuels and Landscape Management.” We are also apprehensive of removing Forest Inventory and Analysis (FIA) from under R&D.

- The important work delivered through the current R&D program does not seemingly encompass the related type of activities of the proposed consolidated BLI.
- The work accomplished through the Forest Inventory and Analysis (FIA) program, funded through R&D serves as the “census for US forests.” FIA data both supports and relies on other research related programs within R&D and we foresee potential issues with separating these interconnected programs. It is critical that this program remains tied to the rest of the R&D portfolio.
- With the proposed consolidation of R&D into the “Vegetation, Fuels and Landscape Management” BLI, we have concerns the critical work of R&D could potentially be disproportionately impacted by budget cuts in the future and also that program transparency within R&D will be reduced.

For these reasons we propose that Forest and Rangeland Research retain its identity, keeping FIA as a subcomponent within R&D.

Your consideration of these comments is greatly appreciated and we hope to meet with you in person to further discuss this important issue.

Sincerely,



Lisa Allen  
Missouri State Forester  
NASF President