July 5, 2016

The Honorable Pat Roberts U.S. Senate SH-109 Hart Senate Office Building Washington, D.C. 20510

The Honorable Debbie Stabenow U.S. Senate SH-731 Hart Senate Office Building Washington, D.C. 20510

Dear Chairman Roberts and Ranking Member Stabenow:

The National Association of State Foresters (NASF) appreciates the Committee's work on this important legislation and *urges the Committee to ensure that legislation is enacted this year* which addresses wildfire funding and forest management challenges.

NASF is composed of the directors of forestry agencies in the 50 states, eight territories and the District of Columbia. Collectively these member organizations have responsibility for forest and fire management on almost two-thirds of America's forests, or 500 million acres. Thank you for the opportunity to comment on S.3085, the Emergency Wildfire and Forest Management Act of 2016. Resolving fire funding challenges and enhancing active forest management, which will actually reduce fire funding challenges, are top priorities for the forestry community. In this letter we want to convey our support for key provisions and ask for your consideration in modifying a few provisions in the legislation. First we want to thank you for your leadership in trying to find a solution to the wildfire funding challenges faced by the USDA Forest Service and the Department of the Interior as well as providing forest management provisions which will help facilitate more active forest management.

Addressing Fire Borrowing: In terms of fire transfers and borrowing, NASF much appreciates the draft bill language which will curtail this late season practice. This practice has deleterious impacts on the agency's ability to develop partnerships and accomplish on the ground work as we have seen the agency cancel contracts with key partners, or send seasonal employees home in mid-summer who were engaged in important resource work. The agency continues to take these actions in order to pay the anticipated fire suppression bill for that season. Per language in this bill, that practice would end.

Continuing Concern for the Erosion of Non-Fire Suppression Programs: In recent years, the portion of the Forest Service's overall budget allocated to fire suppression has grown significantly. As more funding is allocated to fight fires, less is allocated to other areas of the Forest Service budget. Over the past two years there has been a 100 million dollar reduction, per year, in funding available for non-fire suppression programs, including critical fuels and forestry work. This work would actually minimize wildfire impacts. In addition there are a host of forestry and fire support programs critical to the management of the nation's state and private trees and forests which are being adversely affected by this budget trend. Fire suppression costs accounted for 16 percent of the Forest Service's total budget in fiscal year (FY) 1995, grew to over 50 percent in FY 2015 and are expected to continue to increase.

This legislation would provide access to disaster funding to budget for those years when wildfire suppression funding is well beyond what the agency's budget can absorb. We understand that there are two proposals being discussed in

Congress to address this challenge: 1) a budget cap adjustment and 2) access to the FEMA Disaster Relief Fund, as is described in this legislation. NASF does not have a preference in how this challenge is resolved.

However the approach outlined in the bill is only a partial solution. Finding a source for off-line emergency wildfire suppression funding only solves the fire borrowing challenge. It will not solve the erosion of funding for non-wildfire suppression programs. NASF recommends a comprehensive solution that addresses fire transfers and halts the erosion of non-wildfire suppression funding due to increasing suppression costs. This is an urgent priority for the nation and must be resolved. The Committee could consider removing off-line funding from the ten year average calculation or selecting a specific year for base line wildfire suppression funding and amounts above that specific year will be funded off-line in all future budget years.

Addressing the Need for More Active Forest Management: NASF has developed a policy position paper which highlights our suggestions for improving Federal Forest Land Policy (link attached). The forest management reforms in this legislation are generally in line with the recommendations of that policy position. Specifically, our approved NASF policy position does support environmentally responsible reforms in order to encourage more active forest management such as: streamlining the analysis process when there is collaboration of diverse interests, expanded use of categorical exclusions, increasing reforestation efforts after catastrophic wildfires through responsible salvage activity, and piloting arbitration.

Suggestions for Modifications to the Legislation.

We would appreciate an opportunity to visit with the Committee regarding an expanded role of the States' Forest Action Plans as prepared by the State Foresters. Collectively these fifty-nine plans (fifty states, eight territories and the District of Columbia) are the plans for America's forests. Specifically we would ask for changes to the State and Private Forestry Landscape –Scale Restoration Program whereby the State Forest Action Plans (FAPs) would not just be one of several, but the key resource in prioritizing projects. Also, in selecting designated landscapes for the National Forest Accelerated Landscape Restoration Pilot Program, which would likely include cross-boundary work, we would ask that FAP's also help guide those decisions. (See: forestactionplans.org) Lastly we would ask the Committee to consider if there are other opportunities to encourage and allow for expanding the use of authorities to accomplish more cross-boundary forest management.

Again we appreciate the opportunity to provide comment to the Committee on the legislation, urge the Senate to work to pass legislation this year. We look forward to working with the Committee as the legislation moves forward.

Sincerely,

Paul DeLong

President, National Association of State Foresters

State Forester of Wisconsin

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Link to NASF Federal Forest Land Policy: http://www.stateforesters.org/sites/default/files/issues-and-policies-document-attachments/NASF%20Federal%20Lands%20Policy%20Position%20Final.pdf

cc: All Members, Senate Agriculture Committee