



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 included in Title III of the Senate draft fiscal year 2021 appropriations bill for the Department of the Interior, Environment and Related Agencies. Specifically, this letter will address 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 that establishing a Deputy Chief for Fire and Aviation would divert valuable resources from land management activities that reduce the threat of wildfire, only to establish additional bureaucracy around wildfire suppression. Fire threats are best addressed by a holistic all-lands approach to wildfire response and proactive forest management across federal, state, and private lands. The existing structure of the USDA Forest Service’s State and Private Forestry mission area is the best place for additional investment to address these threats.

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 Center. Of those state personnel, 6,026, or nearly 75%, were mobilized to federal wildfires.¹ State forestry

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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 the State and Private Forestry mission area is crucial to ensuring that wildfire response is highly coordinated nationwide and that the Forest Service's wildland fire programs support cross-boundary fuels reduction 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 our communities.

Establishing a Deputy Chief for Fire and Aviation is tantamount to building a "fire agency" and therefore contrary to the intent of the "Wildfire Funding Fix," which Congress passed to free up funding for more active forest management. Additionally, 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 that is best done by maintaining Fire and Aviation Management within State and Private Forestry. Decoupling wildfire management from State and Private Forestry could also disrupt our work to meet the shared goals of the National Cohesive Wildland Fire Management Strategy, which depends on the current structure. It is imperative that wildfire and forest management remain integrated within State and Private Forestry so that state forestry agencies and the Forest Service can coordinate wildfire response and our efforts to improve forest health and reduce 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 to fight a symptom of a larger problem. We must not repeat mistakes of the past and focus only on wildfire suppression. 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 to 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.