



# NATIONAL ASSOCIATION OF STATE FORESTERS

444 North Capitol Street NW | Suite 387 | Washington, DC 20001 | [www.stateforesters.org](http://www.stateforesters.org)

July 1, 2022

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, D.C. 20250

The Honorable Debra Haaland  
Secretary  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, D.C. 20240

Dear Secretary Vilsack and Secretary Haaland,

The National Association of State Foresters (NASF) would like to thank the USDA Forest Service and Department of Interior for their partnership and the opportunity to review and provide state input on the pending *“Federal COVID-19 Testing Implementation Guidance for USDA/FS and DOI Employees and AD Hires Assigned to Wildfire Incidents.”*

Wildfires are normally multi-jurisdictional emergencies with much of the initial and extended attack conducted by state and local wildfire response resources. National Interagency Coordination Center data shows state and local resources respond to an average of 75% of the wildfires in the United States each year.

The nation’s 59 state foresters are concerned the guidance as proposed would diminish already strained operational capacity as summer wildfire threats escalate. We ask that this guidance be revised to reflect the COVID-19 mitigation protocols of 2020 and 2021 that were successfully developed and implemented in the interagency fire environment.

The proposed guidance *“applies to all employees of the U.S. Department of Agriculture, Forest Service and the U.S. Department of the Interior who are assigned to respond to a fire incident, including those who are assigned to work in a fire camp.”* This provision would likely create significant confusion among state forestry agencies and our non-federal partners fighting wildfires. Implementing the testing program alone would place undue burden on both state *and federally-sponsored* incident management teams (IMTs) in today’s challenging wildland fire environment.

The high level of wildfire activity already experienced this fire year has already stressed the resource mobilization process and reduced firefighting resource availability. We fear this guidance would negatively impact national response capability by delaying and further reducing the number of state and local wildland fire resources available for mobilization to incidents in the upcoming summer months.

**Executive Director**  
Jay Farrell

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Wildfire knows no boundaries. As wildfire response leaders we need to communicate, collaborate, and coordinate our resources to meet our common goals of resiliency, safety, and prosperity for American communities. Since the pandemic began, the wildland fire community has done an excellent job minimizing COVID-19 impacts by adhering to existing mitigation protocols developed by the interagency Medical and Public Health Advisory Team. We recommend using what has been proven to work: the 2020 and 2021 COVID-19 mitigation protocols that were developed and successfully implemented in the interagency fire environment.

The NASF Wildland Fire Committee would be pleased to provide further input as non-federal partners and subject matter experts with shared interests in wildland firefighter and public safety.

Sincerely,

A handwritten signature in blue ink that reads "Christopher R. Martin". The signature is written in a cursive style with a large initial "C" and a long, sweeping underline.

Christopher Martin  
NASF President  
Connecticut State Forester