



The Honorable Bruce Westerman
Chairman
Committee on Natural Resources
1324 Longworth House Office Building
Washington, D.C. 20515

The Honorable Jared Huffman
Ranking Member
Committee on Natural Resources
1332 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Westerman and Ranking Member Huffman:

The National Alliance of Forest Owners (NAFO) is a national advocacy organization advancing policies that ensure private working forests provide clean air, clean water, wildlife habitat, recreation, and jobs through sustainable practices and strong markets. Through sustainable forest management, private working forests support over 3.9 million American jobs and over \$252 billion dollars to U.S. GDP. We appreciate your holding a legislative hearing on H.R.4038, the Wildfire Response and Preparedness Act; and we request this letter be included in the hearing record.

We appreciate Rep. Young and Rep. Adam introducing this bi-partisan bill to highlight the need to establish standards for wildfire response times. NAFO members have significant experience with wildland fire mitigation and suppression and achieving desired outcomes at scale and manage teams of staff and contractors who meet Federal and State wildfire suppression qualifications. Many NAFO members share thousands of miles of common boundaries with the US Forest Service or the agencies of the Department of the Interior, and we share a stewardship responsibility to protect natural resources and the communities that depend on them along and across these boundaries. The urgency of the wildfire crisis makes this shared stewardship responsibility more important than ever.

In several recent instances, Federal firefighting agencies have been encumbered by factors that delayed response, and a faster initial attack could have reduced the extent of the damage. In March 2023, NAFO entered into a Memorandum of Understanding (MOU) with the US Forest Service (USFS) to expedite wildfire response on Federal lands adjacent to NAFO member company lands. Under this MOU, the credentialed firefighting resources of NAFO members may be deployed to suppress fires on adjacent Federal land on initial attack, helping to reduce response time. Resources used on initial attack are provided at no cost to the Federal government. The importance of rapid and deliberate action at the onset of a wildfire is clear. Accordingly, NAFO supports the standardization of wildfire response times as suggested in the Wildfire Response and Preparedness Act.

The bill identifies three key timeframes during the first operational period of a wildfire. First, the wildfire is detected and brought to the attention of the Federal firefighting agency. The majority of detections and notifications come from members of the public placing calls to 911, however, detection and notification by way of satellites or camera networks is becoming increasingly common. This combination has significantly reduced detection timeframes.

Second, the Federal firefighting agency with jurisdiction over the wildfire makes a formal decision as to the level of response and resources to send based on conditions and availability. This often involves ordering or dispatching firefighting resources, such as engine crews, airtankers, or smokejumpers, and can happen in a matter of minutes. Under our MOU, USFS field units typically call or text NAFO members following a detection on adjacent Federal lands and quickly decide whether to dispatch Federal or NAFO member resources.

Third, firefighting resources make their way to the wildfire and begin extinguishing or containing the wildfire. Under our MOU, both NAFO and Federal firefighting resources are dedicated to full suppression on initial attack while maintaining appropriate safety standards. The time of dispatch to arrival at the scene is the most variable of these actions.

We believe establishing standards for the amount of time associated with each of these three distinct actions would result in important advancements in public safety and better protection of our shared resources, as well as significant cost savings consistent with our growing experience under the NAFO-USFS MOU. While establishing the standards will not be easy, we believe it can and should be done. While standards for wildfire detections and engagement decisions would likely be uniform across the Country and likely be a matter of minutes as in any emergency situation, response time standards for firefighting resources to first arrive at a wildfire will likely vary by location and conditions. Standards could be set for the minimum level of initial attack response resources dispatched to a wildfire based on local Fire Danger Ratings. Subsequently, the response time standards can be tiered for each of the National Wildland Fire Preparedness levels with different standard response times based on the firefighting resource. For example, during a Preparedness Level-3, the standard response time would be 1.5 hours for a firefighting engine crew and would be 3 hours for an airtanker).

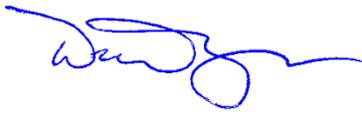
There is precedent for this approach. The National Fire Protection Association, in conjunction with the US Fire Administration, worked through similar complexities when they established benchmark response times for structure fires 25 years ago. Moreover, the Emergency Medical Service community worked in conjunction with the National Highway

Traffic Safety Administration to establish standards for ambulance response times 25 years before that, which was bolstered by legislation—the 1973 Emergency Medical Services Act.

As the Wildfire Response and Preparedness Act notes, once standards are established, agencies will be able to determine the quantity of firefighters and apparatus necessary to meet those standards. One potential enhancement to the bill would be the inclusion of a provision requiring Federal firefighting agencies to notify Congress when annually appropriated funds are insufficient to achieve established standards. We also recommend coordinating with State and local fire agencies during the development of these standards.

NAFO would welcome the opportunity to provide technical assistance to the Committee staff and this bill's sponsors as you work together to refine its provisions. Thank you for leadership and your continued efforts to ensure wildfire threats are mitigated to the greatest extent possible.

Respectfully,



David P. Tenny
President and CEO
National Alliance of Forest Owners
122 C Street, NW, Suite 630
Washington, DC 20001
Dtenny@nafoalliance.org