

OUTDOOR ALLIANCE

June 13, 2015

Senator Lisa Murkowski
Chair, Committee on Energy and Natural Resources
709 Hart Senate Office Building
Washington, DC 20510

Senator Maria Cantwell
Ranking Member, Committee on Energy and Natural Resources
511 Hart Senate Office Building
Washington, DC 20510

Re: Discussion draft, “Wildfire Budgeting, Response, and Forest Management Act of 2016”

Dear Chairman Murkowski and Ranking Member Cantwell:

Outdoor Alliance is a coalition of seven member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, the Mountaineers, and the American Alpine Club and represents the interests of the millions of Americans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our nation’s public lands, waters, and snowscapes. As avid visitors on our nation’s public lands, our members are greatly affected by the impacts of fire and it’s affects on the ability of land management agencies to pursue their varied missions.

Outdoor Alliance greatly appreciates the opportunity to comment on the discussion draft of the “Wildfire Budgeting, Response, and Forest Management Act of 2016.” While we believe the draft takes some important first steps toward addressing the problems associated with fire budgeting, we believe that, as currently proposed, it represents an incomplete fix and includes several provisions that would harm outdoor recreation and conservation values on public lands by limiting opportunities for robust review and public involvement in forestry projects.

We request that the Energy and Natural Resources Committee:

- Ensure that a fire budgeting fix takes steps to avoid the erosion of agency budgets over time as the cost of fire suppression continues to rise;
- Remove the provision requiring that unused appropriated fire suppression funds be used for fire prevention activities in light of the significant past and ongoing effects of fire budgeting shortfalls across agency programs; and



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- Remove provisions that shortcut the NEPA process, which have the effect of eliminating public participation opportunities and endanger recreation and conservation values.

Reducing the erosion of agency budgets

By allowing access to disaster funding only after fire suppression costs have exceeded the ten-year average for fire costs, the discussion draft does not go far enough to prevent the continued erosion of agency budgets over time. In recent years, agency budgets have remained relatively flat, while the costs of fire suppression have continued to grow, a trend that is expected to continue with longer, hotter, drier fire seasons in the West. Currently, the Forest Service expends an unprecedented 52 percent of its budget on fire suppression, a percentage that is forecast to continue growing. Any true fire funding fix must address the problem of the increasing share of agency budgets expended on fire, for example by making fire suppression costs eligible for disaster funding beyond 70 percent of the 10-year average, as under the Wildfire Disaster Funding Act.

Allowing unused appropriated funds to cover other agency programs

Under Title I, Section 104 of the discussion draft, unused funds appropriated for fire suppression are to be directed toward wildfire risk reduction projects. While we agree that this may be an appropriate use of unexpended funds under some circumstances, we believe that, given that past and ongoing affects of fire borrowing and inadequate fire funding on all aspects of the missions of land management agencies, funds should be available for use according to the discretion of the agencies, including for important activities like land management planning, which will provide a broad array of benefits for the health and management of public lands.

Removing provisions that limit public participation in land management

The outdoor recreation community is concerned by several provisions in the discussion draft proposing to create new and unnecessary exemptions from the NEPA process for certain forestry projects. In particular, we are concerned by:

- Title III, Subtitle A, proposing to require only that action/no action alternatives be analyzed for certain projects developed through “collaborative processes” that are ostensibly aimed at fire prevention; and
- Title III, Subtitle D, creating a pilot program for expedited logging of Ponderosa Pine and dry-site mixed conifer forests, which would allow logging contracts with a duration as long as 20 years, although the justification for NEPA exemption is described as a short-term, “emergency” need.



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NEPA review, although at times a cumbersome process, is an essential avenue for public participation in land management decisions. While we understand the potential emphasis on expediting projects derived through collaborative processes, we feel that these processes often reflect a limited spectrum of public lands stakeholders, and that they are not in and of themselves an adequate substitute for the opportunity for broader public comment on important public lands management decisions. Additionally, the alternatives analysis is the heart of the NEPA process, and reducing the number of alternatives under consideration limits the opportunity for stakeholders to come together around innovative solutions that ensure that outdoor recreation, among other public lands values, is represented.

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Thank you for your attention to the critical challenge of fire budgeting and its deleterious impacts on our public lands and public land management agencies. We look forward to continuing to work with the Committee to find solutions to these important issues.

Best regards,



Adam Cramer
Executive Director
Outdoor Alliance

cc:

Brady Robinson, Executive Director, Access Fund
Wade Blackwood, Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater
Michael Van Abel, Executive Director, International Mountain Bicycling Association
Mark Menlove, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Phil Powers, Executive Director, American Alpine Club

