



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

June 13, 2016

Chairwoman Lisa Murkowski
304 Dirksen Senate Office Building
Committee on Energy and Natural Resources
United States Senate
Washington, D.C. 20510

Ranking Member Maria Cantwell
304 Dirksen Senate Office Building
Committee on Energy and Natural Resources
United States Senate
Washington, D.C. 20510

RE: Comments on draft “Wildfire Budgeting, Response, and Forest Management Act.”

Dear Chairwoman Murkowski and Ranking Member Cantwell:

On behalf of the Rural County Representatives of California (RCRC), I am writing in response to your Committee’s call for comments on the draft “Wildfire Budgeting, Response, and Forest Management Act.” RCRC is an association of thirty-five rural California counties, comprised predominantly of public land.

RCRC supports the Wildfire Disaster Funding Act (WDFFA) and the related efforts to reform wildfire suppression funding. We are supportive of WDFFA because it would prevent “fire transfers,” stabilize agency budgets, and prevent the 10 year average from increasing at an unsustainable rate. WDFFA would give the agencies in charge of fire suppression more budget flexibility for management activities by capping annual suppression funding through the appropriations process at 70% of the historical 10 year average and by allowing the agencies access to disaster funds, similar to how other natural disaster response is funded. Currently, the U.S. Forest Service spends more than 50% of its budget on suppression activities, squeezing funds for forest restoration. However, the draft “Wildfire Budgeting, Response, and Forest Management Act” fails to consider reform of the 10 year average funding mechanism. Reform of the 10 year average funding mechanism is a critical part of addressing wildfire budgeting reform and RCRC urges the Committee to rethink the solution they have brought forth thus far.

Section 102 creates a new reporting requirement for the Secretaries of Agriculture and the Interior. The Secretaries would be required to produce discussions of certain fire characteristics, detailed in subsection (B) COMPONENTS, of fires that occurred in the previous year that exceeded 100,000 acres or cost at least \$100,000,000. In recent years, California has experienced three fires that would qualify for examination under Section 102; the Rim Fire (2013), the King Fire (2014), and the Butte Fire (2015). As a result of these fires, RCRC would like to include the following points for discussion in the annual reports: “the impact of dead and dying trees due to disease or bug-infestation on fire severity;” and “the impact of fire on clean water and clean air.”

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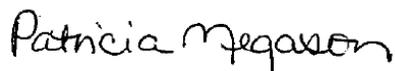
RCRC appreciates the community planning and assistance for at-risk communities provided in Section 204. This federal assistance will help ensure that adequate resources are directed toward the development and implementation of community wildfire protection plans, including the creation of maps that depict wildfire risk. RCRC would like to request “the protection of critical public infrastructure, such as water resource systems, transmission lines, and evacuation routes” as additional subset of acceptable activities under Section 2 - Financial Assistance.

With the mapping provision in Section 204, we question the need for Section 205, which could result in the development of a separate set of fire risk maps. The intent and use of the maps are undefined in the draft bill, and the federal agencies are granted discretion in cooperating with state and local governments and in assigning cost-sharing requirements for developing these maps. We strongly believe that all levels of government must be engaged in wildfire preparedness and response and believe that cooperative mapping efforts should occur within the context of community wildfire protection plans in the wildland-urban interface. If this provision is otherwise intended, RCRC strongly recommends that its purpose be defined in the legislation and that state and local government cooperation be voluntary.

Sections 301 and 331 provide useful forestry management measures for streamlining environmental analysis and accelerating restoration for certain types of forests. RCRC welcomes these provisions and looks forward to their successful application in California. However, we are concerned that the exclusion of critical habitat areas will foreclose these benefits for much of California. While the provisions allow for critical habitat to be included upon conclusion of a Section 7 consultation process, areas eligible for these benefits will diminish as the millions of acres of critical habitat in California continues to grow and as recent federal regulations make it more onerous to prove that habitat will not be adversely modified by the proposed forestry management activity. RCRC recommends that the critical habitat exclusion be dropped from these two provisions, recognizing the emergency public safety purposes that underlay this legislation.

Reforming wildfire budgeting and forest management regulation is a critical first step to making our forests healthier. The reforms contained in the bill will help reduce the risk, cost, and impact of catastrophic wildfires in the future. If you should have any questions regarding the comments made in this letter, please feel free to contact me at (916) 447-4806 or pmegason@rcrcnet.org.

Sincerely,



Patricia Megason
Executive Vice President