



NATIONAL ASSOCIATION OF STATE FORESTERS

444 North Capitol Street NW | Suite 387 | Washington, DC 20001 | 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 Forester (NASF) wants to thank the USDA Forest Service and Department of Interior for their partnership and the opportunity to review and provide state input to the pending policy guidance document *Federal COVID-19 Testing Implementation Guidance for USDA/FS and DOI Employees and AD Hires Assigned to Wildfire Incidents*.

We are concerned that implementation of the guidance currently under consideration will adversely impact 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. These protocols have been tested and proven to work.

Wildfires are normally multi-jurisdictional emergency responses with much of the initial and extended attack conducted by state and local fire resources. National Interagency Coordination Center data shows state and local resources respond to an average of 75% of the wildfires in our country each year. The NASF Wildland Fire Committee is concerned that the proposed guidance and its implementation will create significant burden and confusion within the state forestry agencies and our non-federal partners. For example, the document states “*This 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.*” Implementing the testing program places an additional undue burden on the strained capacity of both State and Federally-sponsored incident management teams (IMTs) in today’s challenging wildland fire environment.

Additionally, the high level of wildfire activity already experienced this fire year has already stressed the resource mobilization process and firefighting resource availability is in short supply. State Foresters fear implementation of this guidance will negatively impact national response capability by delaying and reducing the number of state and local wildland fire resources available for mobilization to incidents in the upcoming summer months.

Wildfire knows no boundaries. As fire response leaders we need to communicate, collaborate and coordinate in order to work effectively together for the common good of our resources,

Executive Director
Jay Farrell

2021-2022 Executive Committee

President Christopher Martin, Connecticut
Vice President Kacey KC, Nevada
Treasurer Scott Phillips, South Carolina
Past President Joe Fox, Arkansas

Northeastern Representative Ellen Shultzabarger, Pennsylvania
Western Representative Thomas Claeys, North Dakota
Southern Representative Rob Farrell, Virginia

communities and citizens. Since the Pandemic began, the wildland fire community has done an excellent job minimizing the disease impacts by adhering to existing COVID-19 mitigation protocols developed by the interagency-member Medical and Public Health Advisory Team.

We ask you to reconsider implementation of the proposed policy guidance document *Federal COVID-19 Testing Implementation Guidance for USDA/FS and DOI Employees and AD Hires Assigned to Wildfire Incidents*. 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 B. Martin". The signature is written in a cursive style with a large initial 'C'.

Christopher Martin
NASF President
Connecticut State Forester