



# INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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June 13, 2016

The Honorable Lisa Murkowski  
Chairman  
Senate Committee on Energy and Natural  
Resources  
304 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Maria Cantwell  
Ranking Member  
Senate Committee on Energy and Natural  
Resources  
304 Dirksen Senate Office Building  
Washington, DC 20510

Dear Chairman Murkowski and Ranking Member Cantwell:

On behalf of the more than 11,000 chief fire and emergency service officers of the International Association of Fire Chiefs (IAFC), thank you for the opportunity to offer comments on your recent discussion draft to address wildland fire budgeting and operations challenges. The IAFC applauds your work on offering a sensible, bipartisan solution to several key wildland fire challenges. While the IAFC largely supports your proposals, there are several areas which we feel could be strengthened by great involvement from local firefighting agencies.

As you continue developing your draft proposal, please consider these following recommendations:

**1) Section 101 – Fire Suppression Funding:** The IAFC supports the federal wildland fire suppression funding mechanism described in your recent discussion draft. The current practice of "fire-borrowing," or using non-suppression funds to pay for federal wildland fire suppression operations, is a dangerous practice which undercuts the ability of the federal government to accomplish preparedness programs that address the root cause of wildland fires. While a variety of alternate funding proposals have been offered, the IAFC supports your proposal to permit the U.S. Department of Agriculture (USDA) and the U.S. Department of the Interior (DOI) to access a discretionary budget cap adjustment after expending 100% of the rolling ten-year average of wildland fire suppression costs. This approach will enable Congress to fully fund fire suppression operations while also allowing the USDA and DOI to access additional funds for the largest, most expensive fires. The IAFC also applauds your recommendation to direct savings and unused funds into fire-related programs to prevent fires and harden communities.

The IAFC strongly encourages you to oppose proposals to require Congress to fund a ten-year average frozen at FY 2016 levels. This proposal would ultimately result in ever-increasing utilization of a budget cap adjustment. Utilizing a frozen ten-year average would simply re-allocate costs rather than force the federal government to actually address the causes of wildland fire. The IAFC also recommends that you resist proposals to utilize the Disaster Relief Fund (DRF) to fund federal wildland fire suppression operations. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Stafford Act; P.L. 100-707) established the DRF to assist state and local government when responding to, and recovering from, a pre-determined list of major disasters. The IAFC opposes the concept of using the DRF, which is meant to give limited support to local government to support regular federal operations. This change would create a dangerous precedent to allow the DRF to fund operations solely managed by federal agencies. Also, we are concerned about the solvency of the DRF. Studies show increasing costs to the

DRF due to expected hurricanes and other disasters. The escalating cost of wildland fire suppression operations could create an unsustainable burden on the DRF.

2) **Section 201 – National Credentialing System:** This section of the discussion draft calls for a national credentialing system, however the IAFC is concerned this system could be duplicative if it does not take into account work already done on this topic. The National Wildfire Coordinating Group's "Red Card" training as well as the Department of Homeland Security's credentialing systems could be helpful starting points and ensure that any new credentialing systems compliment, rather than compete with, existing standards and systems for on-the-ground firefighters.

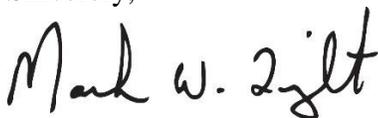
3) **Section 202 – Unmanned Aircraft Systems (UAS):** The IAFC supports the intention behind Section 202 to support the use of UAS in monitoring and suppressing wildland fires. However, the IAFC is concerned that the stakeholders identified in this Section do not include local firefighting agencies or industry stakeholders. The IAFC believes that local firefighting agencies are the first line of defense against wildland fires and must be included in any discussions related to the development of UAS policies and protocols. As a result, the IAFC encourages you to include the language developed by Rep. Kyrsten Sinema in conjunction with the majority and minority staff of the House Committee on Transportation and Infrastructure, the USDA, the Federal Aviation Administration, and the IAFC. This language is enclosed at the end of this letter.

4) **Section 204 – Community Risk Planning:** The IAFC believes community risk assessments and planning are the most important components of a plan to tackle wildland fire. However, the IAFC is concerned with the relatively little inclusion of local firefighting agencies in this section. Additionally, the USDA should consider revising the list of at-risk communities more frequently than every ten years. Thirdly, the IAFC recommends making an addition to this section to call upon the USDA to support developing and maintaining fire adapted communities. Finally, the IAFC recommends removing the reference to "Firewise or programs similar to Firewise" when describing community preparedness programs eligible for funding. The IAFC is concerned that specifically naming one program would lead to the disqualification of similarly recognized state and local preparedness programs such as Ready, Set, Go! or Living With Fire. Instead the IAFC recommends defining eligible programs using the criteria identified in Section 104 of the draft.

5) **Reimbursements:** The IAFC recommends adding a section to this bill to permit the federal government to reimburse states for wildland fire-related mutual aid responses by local agencies. California has experienced problems recently which required the state to fully reimburse local agencies before the federal government would contribute its share of the reimbursement to the state. Adding this clarification would prevent the state from having to fund the federal government's share of the reimbursement before receiving the federal reimbursement. This could be accomplished by amending Subsection 1856a of 42 U.S.C. 15A to replace the word "reimbursement" with "payment" or "compensation."

On behalf of the IAFC, thank you again for your attention to these important issues and your leadership in identifying solutions. The IAFC looks forward to continuing to work with you to secure a reliable and responsible funding mechanism for federal wildland fire operations and to enact other policies which support communities and fire departments while also reducing the threat of wildland fire. Thank you for your continued support for America's fire and emergency service.

Sincerely,



Mark W. Light, CAE  
Chief Executive Officer and Executive Director

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At the appropriate place, insert the following new section:

1 **SEC. \_\_\_\_ . WILDLAND FIRE COORDINATION.**

2 (a) **ACTIVITIES.**—The Administrator shall work in  
3 conjunction with the National Wildfire Coordinating  
4 Group to facilitate—

5 (1) development and dissemination comprehen-  
6 sive wildland fire-related unmanned aircraft systems  
7 guidance on—

8 (A) assisting in fire suppression;

9 (B) providing real-time updates for fire-  
10 fighters;

11 (C) reducing the risk of firefighter fatali-  
12 ties due to wildland firefighting and aircraft ac-  
13 cidents related to wildland firefighting; and

14 (D) assessing the efficacy of current tech-  
15 nology and the potential efficacy of emerging  
16 technology;

17 (2) development of standards for unmanned air-  
18 craft systems utilization, performance, risk manage-  
19 ment, qualifications, training, and equipment; and

20 (3) coordinated and unified unmanned aircraft  
21 systems subject matter expertise to National Inter-

1 agency Aviation Committee and the National Wild-  
2 fire Coordinating Group member agencies.

3 (b) CONSULTATION.—Activities under subsection (a)  
4 shall be conducted with appropriate consultation from na-  
5 tional fire service organizations, adjutants general from  
6 States affected by wildland fires, representatives from rel-  
7 evant industries, legal experts, and other stakeholders.

8 (c) REPORT.—Not later than 1 year after the date  
9 of enactment of this Act, the Administrator shall make  
10 available to Congress a summary of the actions the Ad-  
11 ministrator has taken under this section.

