April 20, 2015

Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C.  20240

Dear Secretary Jewell,

Enhancing the ability to address rangeland fire risk is of the utmost importance, with large portions of the West facing severe drought. Western Governors appreciate that the U.S. Department of the Interior (DOI) is seeking the input of states regarding the complex mix of issues involved in developing effective policies and strategies to prevent and manage rangeland fire and restore rangelands impacted by fire.

In reviewing *Secretarial Order 3336: A Set of Longer Term Actions and Activities, Draft Final Report*, we find many laudable steps to enhance federal coordination with the states and other partners on rangeland and fire management. Western Governors respectfully submit the following comments on the actions outlined in the report.

**Enhancing Wildfire Fighting Resources**

Western Governors support identifying options to expand the availability and sharing of firefighting resources (WGA Policy Resolution 2014-10 *Regional Wildfire Fighting Resources*). The proposed DOI action (7(b)i #4, p. 4) to improve initial attack capabilities by increasing availability of suppression equipment would be a welcome development. Western Governors appreciate the call for updating and strengthening arrangements to use Department of Defense (DOD) wildland firefighting capabilities (7(b)ii #3, p. 6). States need to know how best to access these valuable DOD resources so they are available when and where they are needed (WGA 2014-10).

**Improving Cooperation and Coordination**

Western Governors support identification and removal of policy barriers that prevent the effective sharing of resources for wildland fire and land management activities (WGA Policy Resolution 13-03 *Wildland Fire Management and Resilient Landscapes*). We concur with the draft report’s call for reviewing, revising and updating the approach to cooperative
wildland fire management agreements (7(b)ii #4, p. 7) to ensure firefighting resources are available and directed towards mutually-identified priorities. The actions in section 7(b)vi (p. 24-27) to promote interagency coordination and better align funding with management needs are a step in the right direction.

**Enhancing Local Response Capabilities**

Local communities play a critical role in initial response to rangeland fires. Western Governors embrace DOI’s plan to provide increased technical assistance to communities to enhance their ability to provide local protection (7(b)ii #6, p. 7). Expanding tribal, state and local agencies’ abilities to provide fire protection – by offering training, equipment and technical assistance (7(b)ii #8, p.8) – will also bolster response capabilities. Federal support to increase the presence and capabilities of Rangeland Fire Protection Associations is appreciated and states look forward to continued collaboration with Interior, the Wildland Fire Leadership Council and other partners to grow this local resource.

**Fuels Management**

Including state agencies in the identification of fuels management priorities (7(b)iii #1, p. 11) is a critical step toward focusing resources on areas of highest priority with the greatest likelihood of successful outcomes. States want to ensure adequate inclusion of firebreaks within management plans and, accordingly, support development of best management practices for rangeland fuel treatments (7(b)iii #4, p. 12) and landscape-level fuel treatment plans (7(b)iii #5, p. 13) that involve state experts.

Western Governors strongly support improved National Environmental Policy Act (NEPA) processes associated with fuels management actions (7(b)iii #2, p. 11). Streamlining and shortening NEPA review timelines would help ensure that vital restoration work and fuel treatments are performed on a timely basis.

Incentivizing implementation of fuel treatments on non-federal lands is valuable (7(b)iii #12, p. 16), but only to the extent that such efforts do not detract from the execution of treatments on federal lands (WGA Policy Resolution 2014-11 Species of Concern and Candidate Species).

**Good Neighbor Authority**

Western Governors are strong proponents of using Good Neighbor Authority (GNA) to strengthen the state-federal partnership (WGA 13-03). We support using GNA and other federal funding tools to implement fuel treatments across jurisdictions (7(b)iii #7, p. 14) and support collaborative landscape restoration efforts (7(b)iii #8, p. 14).
Voluntary Conservation Efforts

Voluntary conservation efforts are central to promoting rangeland health to reduce fire risk and promote species habitat (WGA 2014-11). Western Governors endorse expanding technical support and incentives for livestock producers to voluntarily implement targeted fuel treatments (7(b)iii #10, p.15) and grazing methods (7(b)iii #13, p. 16) to improve sagebrush-steppe habitat.

State Science and Expertise

Ongoing research is needed to inform management practices that will provide the greatest benefit to greater sage-grouse and other wildlife dependent on sagebrush ecosystems. States are doing important research in this area and Western Governors urge federal agencies to work directly with states to obtain and use state data and analyses as principal sources to inform design and implementation of land management actions for habitat and fuels management and restoration projects (WGA Policy Resolution 2014-14 State Wildlife Science, Data and Analysis). State agencies should take part in gathering and analyzing data and emerging science for all the actions identified in section 7(b)iv (p. 17-20).

Similarly, state experts should be included in efforts to improve post-fire recovery. State agricultural experts can work with tribal and federal plant material specialists on improving rangeland seeding (7(b)v #2, p. 22) and post-fire restoration (7(b)v #4, p. 23).

Federal agencies should include the states in the identification and prioritization of research needs (7(b)viii #1-3, p. 30-31). This will help avoid duplication of efforts and supply information in greatest demand to multiple interests.

Use of Non-Native Species

As emphasized by Western Governors in our comments on the draft National Seed Strategy and Implementation Plan, the ability to use non-native species for site stabilization, fire breaks, weed control and restoration must be included in management strategies to improve rangeland health (7(b)v #5, p. 23). It is important to work toward ensuring the availability of native and non-native seeds to meet these objectives.

Removing Invasive Grasses

Western Governors support coordinated efforts for early detection and rapid response (EDRR) (WGA Policy Resolution 13-02 Combating Invasive Species) and would like to work with DOI on developing a framework for a national EDRR program (7(b)vii #1, p. 28). The framework should not be solely a federal enterprise but should include the full range of stakeholders needed for optimizing EDRR.
Recognizing how invasive annual grasses contribute to increased wildfire risk and reduced rangeland quality for livestock and wildlife, Western Governors support DOI’s proposed action to accelerate research and demonstration projects for bio-pesticides to control cheatgrass and other invasive annual grasses (7(b)vii #3, p. 29). Developing a streamlined process with the Environmental Protection Agency for registration and labeling of new biological and chemical control agents is another critical step that we strongly endorse (7(b)vii #8, p. 30).

Thank you for undertaking this important collaborative effort. Western Governors believe that there are a number of priorities on which we can work together to improve responsiveness to rangeland fire and enhance rangeland health through fuel treatments and post-fire restoration.

Sincerely,

Brian Sandoval
Governor of Nevada
Chairman, Western Governors’ Association

cc: Mike Connor, Deputy Secretary, DOI
Jim Douglas, Director, Wildland Fire, DOI
Jim Lyons, Deputy Assistant Secretary for Land and Minerals Management, DOI
Ron Dunton, Acting Assistant Director – Wildfire and Aviation, National Interagency Fire Center