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December 1, 2020

Dear Mr. Bonnie:

The National Association of Forest Service Retirees (NAFSR) commends you and your associates for producing the Climate 21 Project. It connects to the issues and strategies that we have worked on so hard over the last four years. Although to date, we have not experienced the results we wanted, we are extremely optimistic about the future possibilities of success by participating in your recommendations and opportunities.

NAFSR represents retirees with thousands of years of experience across every state who have cared for the nation's forests and grasslands. We care deeply about the management and use of the natural resources which make our nation strong. Our membership spans the entire spectrum of natural resource professionals and researchers.

Although we support the Climate 21 Project, we are sharing our particular emphasis issues below:

- 1. Wildfire Crisis.** There is no other issue that rises to the level of importance as wildfire and the associated and compelling need for a change in our current course of action. The nation's forests and grasslands are in crisis and at a serious crossroad. As noted in your Climate 21 Project Transition Memo, the accelerating effects of climate change have contributed to a highly connected and confounding set of serious impacts. The health and vigor of our forests are declining, and trees are dying at an alarming rate. The very values and benefits that forested landscapes provide are at risk across all ownerships, especially in the western states.

To be successful, there needs to be a significant budgetary increase in appropriations that is a sustained investment over a 10 to 15-year timeframe of between \$2 to \$4 billion dollars per year, above current funding levels. Without a sustained off-budget solution that implements the highest priority landscape scale projects, we will never turn the corner on the increasing wildfire trajectory.

- 2. CEQ and FS NEPA Regulations.** We very strongly support the CEQ and Forest Service NEPA regulations as currently published. The remaining four components from the proposed Regulations: (1) Scoping and Public Engagement, (2) Condition Based Management, (3) Definition of Significance coupled to CEQ's definition, and (4) Alignment of CFR Sections with NEPA Documentation, should be revised to be compliant with the 2020 CEQ NEPA Rule and subsequently published. We have invested an enormous amount of time coordinating with partners to develop and contribute to these regulations.
- 3. Forest Service Capacity.** NAFSR is firmly convinced that the Agency does not currently have the capacity to do the job it is required to perform. This does not just mean more money and more people, but what is equally important is the necessary mix of skill types or levels. NAFSR completed a recent study and published a report that confirms the dramatic loss of capacity over time. That report is available on our website (www.nafsr.org) or on request.
- 4. National Wildfire Commission.** One additional major concern we have is that commissions typically take a long time to produce results, if ever. Disastrous wildfires will not wait. We strongly recommend that the proposed Wildfire Commission be established to produce their final recommendations within a short and definite timetable. We would be honored to be included on this commission. NAFSR pledges to assist you in any way that we can to add value to the results.

We believe this Administration has the opportunity and the responsibility to make significant, visible, and lasting improvements to the health of the nation's forests and people. NAFSR pledges to help in this endeavor in any way we can. Our experienced professionals stand ready to assist you whenever you call upon us. We are excited and optimistic about helping this Administration successfully create a long-lasting legacy.

Sincerely,

James L. Caswell

James L. Caswell, Chair
National Association of Forest Service Retirees