Firefighters United for
Safety, Ethics, and Ecology

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The Honorable Ron Wyden and Honorable Lisa Murkowski
Chairman and Ranking Member
U.S. Senate Committee on Energy and Natural Resources
Washington, DC 20510

Dear Chairman Wyden and Ranking Member Murkowski, June 3, 2013

Firefighters United for Safety, Ethics, and Ecology (FUSEE) respectfully requests that this statement be included in the June 4, 2013, Committee on Energy and Natural Resources hearing record regarding ways to improve wildland fire management. FUSEE is a nonprofit organization whose members include current, former, and retired wildland firefighters, fire researchers, educators, and managers, and other interested citizens who support our mission of promoting safe, ethical, ecological fire management. Our organization's primary purpose is to envision ways to improve wildland fire management, so we greatly appreciate the SENR Committee's hearing on this topic. Below is some information and perspective we hope that members of Congress will consider in this and future Committee hearings:

FIRE IS A NATURAL, NECESSARY, AND INEVITABLE PROCESS IN MANY OF THE NATION'S FIRE-DEPENDENT ECOSYSTEMS

Wildland fires have been burning across the Earth's surface for the last 400 million years. Fire is a natural change agent that is part of nature's dynamism. It produces both beneficial and adverse effects on ecosystems, and performs vital functions in fuels reduction, nutrient cycling, and habitat modification that keep forests and grassland ecosystems rich in soil productivity and biological diversity. Some plants reproduce only in the aftermath of fire, and some animals thrive mainly in burned landscapes. The science of fire ecology has made remarkable advances in our knowledge of the many adaptations that plants and animals have evolved to coexist with recurring fires, but policymakers have largely focused on the adverse impacts of fire while failing to acknowledge the beneficial effects, functions, and uses of fire. Many current forest health problems have resulted from decades of well-intentioned but misguided attempts to extinguish all wildfires and exclude fire from the landscape, but fire scientists and managers understand that we cannot absolutely prevent or effectively control all wildfires--nor should we attempt to do so. Traditionally, Congress have focused hearings on how to improve wildfire prevention or suppression, but a better approach would be to explore management policies and practices that enable agencies to maximize fire's beneficial ecological effects while minimizing its adverse social impacts.

FIRE MANAGEMENT INVOLVES FAR MORE THAN WILDFIRE SUPPRESSION

There will always be the need for suppression actions when wildfires threaten lives, homes, and communities, or when the adverse effects of fire threaten other desired social or ecological values. Aggressively suppressing all wildfires is economically and ecologically unsustainable—we must become more strategic and selective in the fires we must suppress, and more opportunistic and receptive to the fires we can *use* for resource benefits or restoration objectives. Moreover, scattering suppression resources all over the landscape and fighting fires that could do beneficial ecological work not only exacts short-term costs and long-term opportunity costs, but also creates potential gaps in protection where firefighters are vitally necessary, such as near communities.

Most of the focus among policymakers and the press has centered on wildfire suppression, and the vast bulk of federal funding goes to emergency firefighting operations, but there is much more to wildland fire management than fire suppression. Other programs include fire education, fire management planning, firefighter training, fire research and monitoring, fuels management and fire restoration, post-fire rehabilitation, and community fire preparedness. Policymakers need to support more balance in focus and funding on these other proactive fire management programs that, in the short-term will help improve the cost-efficiency and effectiveness of fire suppression, but over the long-term will *reduce the need* for reactive fire suppression. Congressional direction in appropriations is needed to help the agencies develop a more balanced fire management system.

Fighting wilderness fires is especially problematic because wildland fire is a natural process that maintains many of the ecological, aesthetic, and recreational values of wilderness. The Forest Service is beginning to realize that suppressing wilderness fires is often a waste of taxpayer dollars during severe fire weather conditions that make wildfire humanly uncontrollable and extremely hazardous. Less acknowledged is that it also wastes taxpayer dollars to aggressively attack lightning-caused wilderness fires during moderate weather conditions when fires produce beneficial ecological effects, and are suitable for managing fire for resource or restoration objectives. Congress could do more to support agencies *managing* and *using* wildfire rather than suppressing all fires, especially in remote wilderness and roadless areas.

WILDFIRE SUPPRESSION COSTS ARE RISING DUE TO EXCESS FUEL LOADS, INAPPROPRIATE HOUSING DEVELOPMENT, AND UNCHECKED CLIMATE CHANGE

Wildfire activity and suppression costs are rising mainly from the synergistic relationship of three socioenvironmental factors: 1) growing fuels accumulations in large part due to past (and still ongoing) fire suppression; 2) expanding housing developments in fire-prone environments; and 3) climate change due to global warming. Under the National Fire Plan, agencies concentrated on fuels reduction, prioritizing mechanical treatments. However, across the millions of acres of public wildlands that warrant fuels reduction it would cost billions of dollars to mechanically treat fuels, and this is not an economically realistic. Even if it were financial possible, it would be technically infeasible because there are many areas too steep, rugged, or remote for machines to operate. Prescribed fire or managed wildfire, on the other hand, are the most practical, economical, and ecologically-sound means of reducing fuels is backcountry wildlands, especially the small-diameter surface fuels that have no commodity value but are the primary fuel type that spreads wildfires. Policymakers should examine policy obstacles (e.g. smoke management regulations) or fiscal constraints (e.g. reduced budgets) to expanding the use of fire to manage fuels.

Suppression costs are also rising due to efforts to protect homes and communities in the Wildland/Urban Interface (WUI) Zone. This is often the most risky and challenging assignment for firefighters because a single wildfire can threaten hundreds of homes simultaneously, overwhelming the capacity of firefighters. Their jobs are made more difficult because many homes and communities are located in indefensible areas (e.g. steep slopes thick with flammable vegetation), are poorly designed or constructed (e.g. have flammable roofs or decks that are easily ignited by the tiniest of embers), or homeowners have not managed the vegetation within their "home ignition zone" (a 200 foot radius around structures). Because private lands where homes are located may not offer the best fuel or terrain conditions for safe or effective suppression operations, firefighters are often sent into backcountry wildlands to attack fires in order to prevent them from eventually spreading toward communities. This not only results in an increase in direct suppression costs, but also an "opportunity cost" of failing to manage backcountry wildfires for fuel reduction or ecosystem restoration objectives. Thus, a paradox exists in which firefighters are either sent to the WUI zone that are some of the worst places for safe, effective firefighting, or are sent sent to backcountry areas to control fire in places or conditions that would otherwise be ideal for using fire use

for resource benefits. Congress should explore policy options for helping homeowners and landowners to proactively reduce wildfire hazards in communities and private lands.

Global warming-caused climate change is the last but not least of the top three most-cited causes of rising suppression costs. Climate change has been the main cause of the increasing length of wildfire seasons, the growing number of acres burned, and the rising frequency of large-scale wildfires or "megafires" since the late 1980s. Climate conditions conducive to large-scale, long-duration wildfires that defy firefighter attempts to contain and control fire are rapidly becoming the "new normal;" therefore, a *reactive* strategy based on emergency fire suppression will likely fail at attempts to protect communities or restore ecosystems, at a huge economic and ecological cost. Congress needs to develop comprehensive climate change legislation that address fossil fuel consumption and carbon emissions.

WILDERNESS FIRE MANAGEMENT WITH FIRE USE STRATEGIES PROVIDE A SOLUTION TO RISING SUPPRESSION COSTS

Excess fuel loads, expanding WUI zone, and climate change are the three most-cited causes of rising suppression costs, and will continue to pose challenges for the far foreseeable future. There will be no quick, cheap, or easy solutions to these problems, and all of these factors entail larger societal changes. However, the approach that offers the greatest potential for immediate cost savings is to focus on the specific strategies and tactics used to manage wildfires. The Obama Administration's 2009 guidance for implementation of the Federal Wildland Fire Policy provides plenty of authority for fire managers to utilize an expanded repertoire of fire management strategies and tactics, including simultaneous community protection and ecosystem restoration objectives or fire suppression and fire use actions on the same wildfire incident. In general, managing wildfires with fire use strategies is generally the least expensive method for treating fuels in backcountry wildlands such as wilderness and roadless areas, and restoring fire-dependent ecosystems at landscape scales. Wilderness fires should be managed for resource benefits and restoration objectives, freeing up fuels reduction dollars and fire suppression crews for where they're needed most: near communities.

Unfortunately, the Forest Service's Washington Office has recently been issuing directives that have highly restricted fire managers from employing fire use strategies or managing wilderness fires for restoration objectives (e.g. the May 25, 2012 memo by Deputy Chief James Hubbard, and the February 20, 2013 memo by Chief Tom Tidwell). These policy directives were not supported by any prior scientific or economic analysis, or input from other federal partners. They set back the advance of ecologically-based fire management and the Administration's 2009 policy guidance--an effort that literally has been decades in the making--and have caused widespread confusion within the fire management community. Congress should request a GAO study to determine how and why high-level Forest Service officials have been able to undermine progressive fire policy developments, and should establish a blue ribbon panel to explore the proper role of fire use strategies and tactics in fuels reduction and ecosystem restoration programs and projects.

SUMMARY: CONGRESS CAN IMPROVE WILDLAND FIRE MANAGEMENT BY SUPPORTING MANAGED WILDFIRES AND FIRE USE IN WILDERNESS AND ROADLESS AREAS

For a number of reasons concerning firefighter safety, agency expenditures, and ecological restoration, as a matter or routine wilderness fires should be wisely managed rather than aggressively suppressed. Congress should work with agencies to create new incentives to encourage managers to adopt a "minimax strategy" for wildfire response in wilderness and roadless areas: minimize the firefighter safety risks, taxpayer costs, and environmental damage caused by aggressive suppression while maximizing the social and ecological benefits of wildland fire. With firefighter safety and community protection foremost in mind, every wildfire ignition should be managed with this kind of minimax strategic thinking, but wilderness and roadless fires are especially suited for low-cost fire use strategies that can accomplish

high-benefit restoration objectives. Congress would serve taxpayers and firefighters well by helping to wean federal agencies away from reactive fire suppression, and redirecting agency focus and funding on a balanced system of proactive fire management.

Respectfully,

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