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Chairperson Lisa Murkowski and Ranking Member Joe Manchin
U.S. Senate Committee on Energy and Natural Resources
Washington, DC 20510

Dear Chairperson Murkowski and Ranking Member Manchin,

June 9, 2020

Firefighters United for Safety, Ethics, and Ecology (FUSEE) respectfully requests that this statement be included in the record of the June 9, 2020 hearing by the Committee on Energy and Natural Resources regarding Wildfire Management in the Midst of COVID-19. FUSEE is a nonprofit organization whose members include current, former, and retired wildland firefighters, fire scientists and managers, and other interested citizens who support safe, ethical, ecological fire management. Our organization's primary purpose is to envision ways to improve firefighter safety in wildland fire management, so we greatly appreciate the SENR Committee's hearing on this topic. Below are some key points we hope that members of Congress will consider in this and future Committee hearings:

**WILDLAND FIREFIGHTERS ARE ESSENTIAL BUT NOT EXPENDABLE
WORKERS: THE COVID-19 PANDEMIC MAKES IT IMPERATIVE TO CHANGE
FIRE MANAGEMENT POLICIES AND PRACTICES**

This wildfire season will challenge the wildland fire community like never before. The COVID-19 virus pandemic has already caused pre-season firefighter trainings and preparations to be cancelled or delayed, and crew leaders are worried that this year may see increased firefighter fatalities from all the disruptions and distractions in addition to the disease. It is imperative that policymakers understand that, like other first responders, wildland firefighters are *essential but not expendable*. There are no "acceptable losses," and young firefighters' lives should not be sacrificed in order to avoid making long overdue changes in fire management policies and practices. Indeed, the actions taken this season to account for the pandemic should not be seen as a temporary fix for a temporary situation, but rather, should become part of making permanent changes in the way agencies work with and communities live with wildland fire.

**NEED TO BE SELECTIVE AND STRATEGIC IN SUPPRESSION ASSIGNMENTS:
NO RESURRECTING THE OBSOLETE 10:00AM POLICY OF AGGRESSIVELY
ATTACKING ALL FIRES**

Proponents of systematic fire suppression are using the excuse of the COVID-19 virus and desires to avoid wildfire smoke as arguments for resurrecting the obsolete 10 a.m. policy of fire control. There is a reason that policy is obsolete: it is ecologically and economically unsustainable, and is simply not viable in the short- or long-term. Although the temptation to

ban managed wildfires and even prescribed fires may be great as a perceived simple solution for smoke avoidance, there must not be a repeat of the disastrous Hubbard Memo of 2012 that banned all fire use across the country, including wilderness areas and roadless wildlands. Fire managers and line officers should be empowered to make decisions using science-based risk assessment tools that utilize the full range of wildland fire responses, including confinement strategies and fire use tactics to manage fires for resource benefits--and firefighter health and safety.

Aggressive suppression on wildfires in remote backcountry wildlands is not essential duty, often causes more environmental harm than social benefit, and spends taxpayer dollars and resources that are critically needed to defend at-risk communities. Aggressive suppression on backcountry wildfires where there are low values-at-risk should be avoided to the extent possible in order to limit firefighter exposure to the combined safety risks inherent to firefighting and the health hazards unique to COVID-19. Indeed, a new line item should be added to Strategic Risk Assessments to help justify modified suppression strategies and fire use tactics in backcountry wildlands: risk of firefighter exposure to COVID-19. Crew health and suppression resources must be reserved for the times, places, and conditions that matter: wildfires burning near homes and communities during conditions that are likely to yield successful suppression actions. Sending crews to attack all fires in all places at all times will be a recipe for disaster, depleting the workforce and detracting from its ability to protect homes and communities.

FIREFIGHTERS' LIVES SHOULD NOT BE SACRIFICED TO AVOID SMOKE EMISSIONS: THERE ARE MORE PRACTICAL AND ECONOMICAL METHODS FOR CARING FOR PUBLIC HEALTH THAN SUPPRESSING ALL FIRES

There is evidence that polluted air may compromise lung health in ways that make the virus spread easier or make individuals more severely ill. Policymakers are concerned about wildfire smoke impacting citizens in rural communities, but wildland firefighters literally put their lungs on the line! They should not be asked to take on more risk or endanger their health or safety to try to suppress all wildfires in an attempt to stop all smoke emissions. Fires and their smoke will inevitably happen as they have for the last 400 million years on Earth. To continue futile attempts at fire exclusion across the landscape will simply defer those fires and their smoke to future conditions that, given climate change, are predicted to result in more extreme fire behavior and severe smoke events. In particular, mop-up is especially harmful to firefighters' respiratory systems, and standards for mop-up after fire containment should be changed to allow more fires to naturally burn out on their own.

We can mitigate smoke impacts through active fire management techniques, but we cannot fireproof or "smokeproof" forests, shrublands, and grasslands. The best time to mitigate smoke impacts is outside of wildfire season when socially distanced workers can do proactive fuels management work, including controlled burns under conditions where smoke disperses to the upper atmosphere.

Firefighters will pay the price with their health and safety for futile attempts to try to suppress all fires or smother all smoke. But we can take steps to mitigate smoke impacts on

communities and smoke-sensitive individuals. By far the largest wildfire threat to public and firefighter health is when wildfires ignite homes and buildings are incinerated. Burning of modern houses and cars yields toxic smoke and ash. It is therefore imperative to reduce home ignitability and keep fire out of urban areas. Sending crews to chase fires in backcountry wildlands does little to protect communities. Instead, suppression crews and resources should be concentrated in frontcountry rural areas where their labor is more effective and more needed.

Communities will be affected by smoke from distant wildfires (including outside the U.S.) that cannot be controlled by firefighters. Thus, policymakers should be making contingency plans such as installing air filters in key public buildings that could serve as smoke shelters for smoke-sensitive people, and preparing shelters for evacuees that provide filtered air, adequate spacing, and proper sanitation. These practical and focused activities will be much more effective in maintaining public health than attempting total suppression across the landscape.

FIREFIGHTERS NEED PROPER SOCIAL DISTANCING TO PREVENT VIRUS SPREAD: EXPANDING FIRE CAMPS TO GREATER SIZE IS A FALSE SOLUTION

At this point in time while effective cures or vaccinations are not yet available, health screening, personal protective gear, social distancing, and isolation are the best methods for limiting the spread of this highly contagious virus. Traditional fire basecamps are places where the risk of virus spread is especially high, and containment will be virtually impossible. In fact, Forest Service researchers predict that up to 10% of the workforce could become incapacitated from virus contagion in a worst case scenario, and mortality rates from COVID-19 could surpass all other causes of firefighter fatalities. Entire crews and perhaps whole camps could be sidelined if even a few individuals contract the disease. This would be an epic public health disaster with potentially catastrophic consequences for rural communities at risk.

In recent years fire camps have already grown to become excessively large "mini-cities," especially on large wildfire suppression incidents. They should not be expanded further in size in a flawed attempt to provide social distancing for firefighters. The risk of casual contact and contagion is simply too great in large firecamps. Instead, agencies should enable social distancing and isolation by having crews work and travel together in small, cohesive, self-sufficient modules (like professional sports teams), and dispersing them to smaller spike camps, coyote camping, motels or air b&b. Some workers, such as planning staff, could perform their duties from remote stations using teleconferencing for briefings. Managing wildfires with fire use strategies and tactics are especially suited for smaller crews working in dispersed, remote stations. This can provide better social distancing and isolation while avoiding the high costs of large firecamps and Incident Management Teams, and helping prevent virus spread among firefighters.

AGENCIES MUST FULLY SUPPORT THEIR WORKFORCE: FIREFIGHTERS MUST BE PROPERLY COMPENSATED FOR THE EXTRA RISKS AND HAZARDS THEY FACE DURING THE PANDEMIC

This year the greatest threat to firefighter health and safety may not be the normal accidents associated with fighting fires, but the abnormal risks and hazards of the COVID-19 pandemic. These hazards may be greatest away from the firelines--in firecamp, during travel, while performing project work, etc. All fire management workers and support staff regardless of their assignment should be compensated with hazard pay for the full scope of their services this season. Individuals who test positive or get ill from the virus must be automatically approved for workman's compensation and receive full medical care. They should not have to shoulder the burden of proving they acquired the virus on the job, rather, it should be assumed to be a job-related injury. Crewmembers who face mandatory quarantine must also receive their salaries or unemployment compensation for their lost wages.

Wildland firefighters and other fire management workers must be fully supported and adequately compensated for assuming the extra risks and hazards of performing their duties during the pandemic, and the lost income opportunities during mandatory quarantine periods. Without this solid, upfront commitment from agencies to support their workforce in the face of extraordinary risks this fire season, agencies risk losing a significant number of their employees at the very time the nation needs them the most.

In conclusion, Firefighters United for Safety, Ethics, and Ecology stands behind the right of wildland firefighters and other fire management workers to the best available science-informed policies for ensuring their health and safety. Firefighters are essential but not expendable workers who should not be sacrificed while more practical and economical steps are available to mitigate wildfire risks and smoke hazards during the pandemic.

Respectfully,

Timothy Ingalsbee, Ph.D., Executive Director, FUSEE