



Firefighters United for Safety, Ethics, and Ecology

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Dear Senator,

September 5, 2006

Firefighters United for Safety, Ethics, and Ecology (FUSEE) is a non-profit organization of current, former, and retired wildland firefighters and other concerned citizens dedicated to promoting firefighter and community safety, ethical public service, environmental protection, and ecological restoration. We urge you to oppose H.R. 4200, the Forest Emergency Recovery and Research Act, and its companion bill, S. 2079, the Forests for Future Generations Act. These bills would make forests more flammable and increase the safety risks for wildland firefighters and rural communities. In addition, they fail to address the urgent needs of rural communities for practical forest restoration projects *before* severe wildfires occur, and would divert taxpayer resources away from critical pre-fire activities located near communities.

H.R. 4200 encourages the creation of flammable plantation-style tree farms in recently burned forests.

Tree plantations stocked with even-aged nursery-grown conifers, logging slash, and invasive weeds pose some of the greatest safety hazards to firefighters. When wildfires enter these homogenous, contiguous fuelbeds they can suddenly “blow-up” with extreme fire behavior, rapidly increasing fireline intensity and rate of fire spread. Not only do young tree plantations present extreme fuel hazards, but since they are usually located near logging roads, they pose high fire risks, too, because logging roads provide prime access for accidental or intentional human-caused wildfires. Indeed, young tree plantations function like “fire bombs,” and logging roads serve as their “fuses.” Before Congress encourages new plantations, it should provide ample funding to reduce the fuel hazards and fire risks presented by *existing* plantations land management agencies have established since the 1960s.

H.R. 4200 would extend obsolete fire exclusion policies across the landscape.

Young conifers from one to forty years old in even-aged plantations are highly vulnerable to catastrophic damage from even low-intensity fires. For example, in the 2002 Timbered Rock fire in southern Oregon, 100% of tree plantations under 35 years in age burned with complete mortality while only 10% of native stands over 200 years old burned severely. Consequently, all wildland and prescribed fires must be excluded from plantations for four or more decades until the trees have grown to sufficient size, age, and spacing to be able to resist damage from fire. In ecosystems with frequent fire regimes that naturally burn every five to 30 years, suppressing and excluding all fires can have huge negative impacts on fuel loads, fire hazards, and forest health. This, in turn, puts firefighters at greater risk from future high-intensity fires, and forces taxpayers to foot the bill for costly fuels treatments to mitigate the adverse effects of fire exclusion.

It does not take many plantations to compromise the ability of firefighters to manage prescribed fires or use wildland fires for resource benefits across a much wider landscape. Too often wildland firefighters are forced to aggressively fight fires—even in remote forests or fire-dependent ecosystems—solely because wildfire might spread to plantations located several miles away. For example, firefighters had to aggressively suppress the 2005 Blossom Fire in the Wild Rogue Wilderness Area in southern Oregon because the fire could have spread to tree plantations outside the wilderness. Fire suppression operations were extremely hazardous to firefighters working in the steep, rocky terrain, and due to the safety hazards posed by helicopter operations, the Bureau of Land Management prohibited rafters from floating down the Rogue River. This shutdown of commercial and recreational rafting during the peak of the rafting season was a huge blow to the local economy, causing the Douglas County Commissioners to declare an economic disaster. Ironically, the Blossom Fire had beneficial ecological effects in the wilderness, but many of these resource benefits were limited or offset by suppression-caused damage. By aiding the conversion of fire-resilient native forests into fire-susceptible tree plantations, H.R. 4200 would compel land managers to continue costly, ecologically destructive fire exclusion policies across the landscape, adding to forest health problems that increase the risk of large-scale severe wildfires.

H.R. 4200 would put old-growth forests at greater risk of destructive fire suppression.

Because tree plantations represent expensive financial investments to protect while native old-growth stands cost the agencies nothing to grow, land managers rate plantations higher than old-growth when calculating values-at-risk for devising suppression strategies. Old-growth stands are often sacrificed during wildfire suppression operations in order to save plantations; for example, firefighters have been ordered to bulldoze firelines and ignite backfires in

200 year old native tree stands in order to keep wildfire out of 20 year old tree plantations. H.R. 4200 would further skew suppression priorities by creating a perverse incentive for land managers to ignite high-intensity backfires in old-growth stands as a means of gaining post-fire salvage timber sales. The high-intensity backburns ignited in the North and South Kalmiopsis Inventoried Roadless Areas during the 2002 Biscuit Fire that are now the sites of clearcut salvage logging provide the clearest example of this potential outcome of H.R. 4200.

H.R. 4200 fails to account for fire suppression risks, costs, and impacts

Because young plantations must be protected from all wildland fires for several decades, future fire suppression actions must be factored into the cost of establishing new plantations. Firefighting is inherently hazardous duty that puts the lives, health and safety of firefighters at risk. Firefighting is quite expensive, too, costing taxpayers over a billion dollars per year. Aggressive firefighting also damages the land, causing significant impacts to soils, streams, vegetation, wildlife habitat, and scenic/recreational values. The risks, costs, and impacts of firefighters protecting vulnerable young tree plantations must therefore be included in the total price of the proposed legislation.

Given the experience of recent wildfire seasons, the Forest Service cannot even defend the plantations it has already established since the 1960s. It would be irresponsible of Congress to commit the agency to continued fire exclusion and aggressive suppression to protect even more plantations. After years of arguing that “there are too many small trees” causing a forest health crisis in America’s forests, now the proponents of H.R. 4200 claim the exact opposite: there is an emergency crisis because “there aren’t enough small trees!” This contradictory message undermines public confidence in forest managers and policymakers. The real forest health problem facing much of America’s western wildlands is a lack of fire, not a lack of trees.

Until rural communities are prepared for fires, our ability to use all the tools of modern fire management is compromised.

The most cost-effective and ecologically-sound tools to manage fire in wildlands are prescribed fire and wildland fire use. These can effectively reduce hazardous fuels and restore ecological conditions at a fraction of the cost of mechanical treatments or wildfire suppression. These tools also greatly improve the safety and working conditions for wildland firefighters. However, unless and until rural communities are prepared with defensible space, options and opportunities to manage fires across the landscape will be squandered. For example, aggressive suppression methods were used on the 2002 Biscuit Fire--which burned almost entirely in fire-dependent ecosystems within designated wilderness and inventoried roadless areas—because small communities along the Illinois Valley had no defensible space prepared for firefighters. At a cost of more than \$155 million, the Biscuit Fire earned the distinction of being the world’s most expensive wildfire suppression incident in history. If the local communities had been properly prepared for wildland fire, that event could have been managed at much less cost to taxpayers and far less risk to firefighters with Wildland Fire Use and Minimum Impact Suppression Tactics. H.R. 4200 does nothing to help fire managers safely use wildland fire.

H.R. 4200 fails to address the current fuel hazards in existing plantations, fails to acknowledge the inherent futility of creating new plantations in fire-prone environments, fails to reflect the future safety risks to firefighters and economic costs to taxpayers from fighting all fires near plantations, fails to protect native fire-dependent and old-growth forests from destructive fire exclusion and aggressive fire suppression, and fails to provide for community fire preparation. For all of the above reasons and more, Firefighters United for Safety, Ethics, and Ecology strongly encourages you to oppose H.R. 4200 and S. 2079.

Sincerely,

Timothy Ingalsbee, Ph.D., Executive Director
Firefighters United for Safety, Ethics, and Ecology