



Firefighters United for Safety, Ethics, and Ecology

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Senator Jeff Bingaman, Chairman
Senator Pete Domenici, Ranking Member
Energy and Natural Resources Committee
304 Dirksen Office Building
Washington, D.C. 20510

Dear Senator Bingaman and Senator Domenici,

June 21, 2007

Thank you for this opportunity for Firefighters United for Safety, Ethics, and Ecology (FUSEE) to provide written testimony for your July 26, 2007 hearing on the preparedness of federal land management agencies for the 2007 wildfire season and suppression cost containment issues.

FUSEE is a nonprofit organization whose members include current, former, and retired wildland firefighters; fire ecologists and managers; fire scientists and educators; forest conservationists; and other citizens who promote safe, ethical, ecological wildland fire management. We support a new, emerging paradigm that seeks to holistically *manage* wildland fire for its multiple social and ecological benefits instead of endlessly “fighting” it across the landscape. Our ultimate vision is the creation of fire-compatible human communities able to live safely and sustainably within fire-adapted ecosystems and fire-permeable landscapes.

In our view, preparing for wildland fires and containing the costs of emergency wildfire suppression is both a practical and an *ethical* issue for two important reasons. First, every taxpayer dollar that goes to suppressing wildfires represents less money available for other valued public services, including ecological restoration of public lands. Federal lands are degraded by decades of inappropriate fire suppression, commercial logging, livestock grazing, and road-building—all of which contribute to increased wildfire hazards and suppression costs. These public lands are in desperate need of restoration treatments not only to repair the damage of the past but also to prepare for the changes in the future due to global warming.

Second, for those times and places where wildfire suppression is necessary and desirable, every taxpayer dollar that is spent on inefficient or ineffective suppression actions represents waste and abuse not only in terms of misspent money, but also degraded natural resources, destroyed homes, and increasingly, lost firefighter lives. Thus, in our view, lack of preparedness for wildland fires leads to lack of cost constraints for emergency wildfire suppression. Requiring federal land management agencies to be fully prepared for wildland fire is fundamentally an ethical issue interrelated with issues involving firefighter and community safety, environmental protection, and ecological restoration.

In this spirit, FUSEE would like to offer the following constructive criticisms and policy recommendations:

1) Fire management planning is vital for wildfire preparedness.

The 1995 Federal Wildland Fire Management Policy (Fire Policy) was developed in the wake of the terrible 1994 fire season in which 34 of the nation’s most elite trained firefighters died in the line of duty. The 1995 Fire Policy called for a fundamental shift in agency philosophy and cultural attitudes toward fire, the integration of fire management with forest and resource management objectives, and the full involvement of interagency partners and the public in fire management. This effectively expanded the mission of fire managers beyond their traditional duties of preventing or suppressing wildfires to include reducing hazardous fuels and restoring fire-adapted ecosystems.

The 1995 Fire Policy clearly stated that,

"Every area with burnable vegetation must have an approved Fire Management Plan (FMP)...Fire Management Plans must also address all potential wildland fire occurrences and include the full range of fire management actions."

Essentially, the entire federally-managed landbase should undergo fire planning wherever wildland fires might start or spread.

Proactive fire management planning was so important that it was discussed in four of the Fire Policy's nine Guiding Principles, and was put at the top of the list of 83 Action Items in the Fire Policy's 1996 Implementation Action Plan.

Following the "millennial fire season" of 2000, the Fire Policy was formally reviewed and updated, further emphasizing the importance of developing current, approved FMPs in six of the 17 Policy Statements, and four of the 11 Implementation Actions. Noting that federal land management agencies had not been developing FMPs, the Fire Policy Update stated that,

"Fire Management Plans that implement Federal Fire Policy must be completed as soon as possible. All land management agencies should place a high priority on completion of these plans. If necessary, land management plans should be updated, revised, or amended to allow full implementation of Federal Fire Policy."

This call to action to develop FMPs was also echoed in reviews conducted by the National Academy of Public Administration, and the Government Accountability Office.

In 2000 the Western Governors' Association (WGA) also developed an important policy document, "A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: 10-Year Comprehensive Strategy," (Comprehensive Strategy) that later became a formal part of the National Fire Plan. The WGA's Comprehensive Strategy emphasized the importance of FMPs in two of its Implementation Tasks and two of its Performance Measures; for example, "Percent of burnable acres covered in federal FMPs in compliance with Federal Wildland Fire Policy" was a performance measure for federal fire managers.

In sum, the 1995 and 2001 Federal Wildland Fire Policy provides the philosophical and policy foundation for all federal wildland fire management activities. The WGA's Comprehensive Strategy and the National Fire Plan also guide fire management programs. Each of these policy documents clearly state the critical need to develop science-based collaborative FMPs. We emphasize this history of policy development of FMPs because FMPs are one of the essential elements of Fire Preparedness that helps make fire management safer, more efficient, more effective, and less costly.

Unfortunately, Forest Service officials and some members of Congress dismiss fire planning as nothing more than "bureaucratic paperwork" that needlessly takes time, energy, or money away from "actions on the ground." On the contrary, FMPs represent wise, strategic investments essential to wildfire preparedness. Indeed, it begs the question, what does it mean to be "prepared" if one does not have an adequate *plan*?

2) FMPs can help contain wildfire suppression costs

FMPs can contain suppression costs by helping to focus firefighting actions to the times and places and methods it is most safe, effective, and necessary. FMPs can also reduce suppression costs by setting priorities for hazardous fuels reduction, and designing ecosystem restoration programs and projects that in the long run will reduce uncharacteristic wildfire severity and improve forest ecosystem health. One fire management method that effectively accomplishes both hazardous fuels reduction and ecosystem restoration is Wildland Fire Use (WFU). WFU has the added economic benefit of avoiding damaging suppression actions that then require costly post-fire rehabilitation treatments.

In fact, the U.S.D.A. Inspector General's recent "Audit Report on Forest Service Large Fire Suppression Costs" noted the potential cost savings related to WFU, and strongly recommended its increased application. According to current Forest Service policy, though, FMPs are required in order to implement WFU. Without a current, approved FMP in place that authorizes WFU, the agency has only one option in response to wildland fires: total aggressive suppression. It must be emphasized that each and every time the agencies engage in emergency wildfire suppression, it involves risks to firefighter safety, costs taxpayers lots of money, and inflicts damages on the natural environment. WFU is a proven means of reducing those risks, costs, and impacts.

In comparing costs of wildfire suppression versus WFU, acre for acre WFU is far cheaper. For example, in the Environmental Assessment for the Sequoia/Kings Canyon National Park's FMP, it was disclosed that for large fires, wildfire suppression cost an average \$1,300 per acre, while WFU on large fires cost only \$87 per acre! On small fires, wildfire suppression cost \$5,900 per acre while WFU cost \$2,600 per acre (the difference in costs between large and small fires are due to the economies of scale). Increasing the use of WFU would have multiple positive impacts on reducing fire management costs, especially wildfire suppression and hazardous fuels reduction programs, however, WFU is not an option if there is no FMP in place. We support the Inspector General's call for increasing the use of WFU, and removing all institutional and policy obstacles that constrain WFU opportunities.

3) Existing Forest Service FMPs have serious flaws

The U.S.D.A. Secretary chartered an Independent Large Wildfire Cost Panel to explore suppression cost containment issues. Their report, "Towards a Collaborative Cost Management Strategy: 2006 U.S. Forest Service

Large Wildfire Cost Review Recommendations” (The Brookings Report), discusses in detail the shortcomings of Forest Service FMPs, and recommends the use of FMPs as “strategic frameworks for managing fire suppression investment.” In the Brookings Report’s examination of the FMPs for the National Forests that experienced the largest, most expensive wildfires in 2006, the majority of FMPs:

- Lacked information on recent fire history that could have guided suppression strategies and tactics.
- Defined fire management units according to management objectives rather than geographic boundaries that made sense for managing fire.
- Lacked information on the Wildland/Urban Interface and Intermix or adjacent non-Forest Service lands.
- Did not define management techniques for the implementing the Appropriate Management Response (AMR), and defined AMR only from a suppression point of view.
- Authorized WFU on less than half of available lands; nearly half of the National Forests in the sample did not authorize WFU at all.
- Lacked up-to-date information on recent fuels reduction treatments.
- Did not provide any substantive guidance for managing the costs of wildfire suppression.

The Brookings Report concludes that existing Forest Service FMPs were static documents poorly linked to underlying Land and Resource Management Plans, and have minimal to no value in developing the actual strategies and tactics used to respond to wildfires. Clearly, the agency’s whole approach to pre-fire planning—the essence of wildfire preparedness—needs to be fully examined and fundamentally changed.

4) The U.S. Forest Service is shirking its responsibility to develop FMPs that comply with the Nation’s environmental laws, best available science, and democratic principles

Existing Forest Service FMPs are not only insufficient for meeting the challenges of modern fire management, but they are also illegal since they do not comply with the National Environmental Policy Act (NEPA). For example, almost all Forest Service FMPs lack a foundation in sound fire ecology science. Thus, when FMPs mandate aggressive fire suppression and fire exclusion in remote areas located in fire-dependent ecosystems, this causes forest health problems that ultimately increase wildfire hazards, thereby increasing suppression costs. All FMPs are devoid of analysis and discussion of a range of alternative management strategies. This analysis is essential for implementing AMR and developing successful cost containment strategies. All FMPs fail to include public processes for informed citizen review and comment. FMPs developed by a few Forest Service staff thus lack the benefit of local community knowledge of the values-at-risk, and this leads to the agency engaging in suppression actions where the costs of suppression outweigh the benefits. Moreover, the agency lacks the ability to prioritize both fuels reduction treatments and protection actions that matter most to the public.

In response to litigation by environmental organizations and the California Attorney General’s Office, two separate federal court decisions ordered the Forest Service to develop FMPs that comply with the NEPA. The Forest Service reacted to these court orders in 2006 by withdrawing the FMPs from the Six Rivers and Sequoia National Forests at the onset of wildfire season. The agency is threatening to withdraw more FMPs if additional lawsuits are filed. Furthermore, it is in the process of eliminating requirements for FMPs in the Forest Service Manual. It took over a decade since the adoption of the Federal Fire Policy for the Forest Service to develop FMPs for every National Forest, and now the agency is beginning to remove them. In essence, the Forest Service is going in reverse in terms of implementing the Fire Policy, and in so doing, is becoming dangerously *less* prepared for wildland fire.

Imagine if a federal court ordered the city of New Orleans to involve the public and scientists in hurricane response planning, and the response of local government officials was to withdraw its plan and eliminate hurricane planning altogether! The Forest Service’s attitude and response to FMP litigation is analogous, and is a recipe for future wildfire disasters at huge taxpayer costs.

We have belabored the issue of FMPs in the Forest Service because we feel that it is the very foundation of preparedness for all aspects of wildland fire management. Beyond planning for wildfire suppression, FMPs should also provide analysis and strategic guidance for prescribed burning and ecological restoration projects, fuels management and vegetation monitoring, fire communication and prevention education programs, wildland fire use objectives, Appropriate Management Response methods, analysis of the environmental effects of fire suppression and fire exclusion, and especially cost containment factors for fire management activities. After numerous internal reviews and external studies on this subject, the Forest Service continues to approach suppression cost containment from a reactive perspective—how to cut costs during wildfire emergencies—rather than from a proactive and strategic perspective—how to prevent the need for costly emergency wildfire suppression in the first place.

FUSEE believes that the solution to efficient and effective wildfire preparedness and cost reductions in fire management programs is not to “cheapen” suppression operations, but rather, to invest in more robust pre-fire planning, public fire education, fire ecology research, community fire preparedness, and ecological fire restoration. The goal really should be to make emergency wildfire suppression the exception, rather than the norm.

Again, without strategic FMPs in place before wildfires ignite, the Forest Service is basically choosing to *blindly* fight wildfires, with all the risks to firefighters, costs to taxpayers, and impacts to natural resources and ecosystems inherent in reactive, emergency wildfire suppression. There is one additional value and need for strategic, long-term

fire planning--perhaps the most important one of all: the need to prepare for the coming changes in vegetation, fuels, and fire regimes caused by global warming and climate change. We strongly urge that members of the Committee examine the "San Diego Declaration on Climate Change and Fire Management," drafted by the Association for Fire Ecology and ratified at the Third International Fire Ecology and Management Congress, for advice on policies helping to developing long-range fire and land management plans to prepare for climate change.

Thank you for this opportunity to provide input to the Senate Energy and Natural Resources Committee for your June 26, 2007 Oversight Hearing on wildfire preparedness and suppression cost containment issues.

Sincerely,

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