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## **Analysis of policy recommendations by the Governor's Wildfire Response Council**

**by Firefighters United for Safety, Ethics, and Ecology (FUSEE) September 16, 2019**

The following analysis concentrates on the work of the Fire Suppression Committee of the Governor's Wildfire Response Council (WRC), relying on draft policy recommendations issued on September 16, 2019.

### **Introduction: A Missed Opportunity at Developing a Progressive Vision for Fire Management that was Undermined by Allegiance to an Obsolete Fire Exclusion Paradigm**

The Governor's Wildfire Response Council (WRC) had an ambitious agenda, and its members should be commended for their devoted public service. There are several progressive policy recommendations in the WRC document, including a call to:

- increase investments in fuels management
- develop sustainable land use practices within the Wildland/Urban Interface (WUI) zone
- update building codes to deal with ignition sources outside structures
- revise the scope and effectiveness of firefighting in planning.

But these progressive policies are subordinated to the main overriding goal of intensifying fire exclusion and expanding aggressive fire suppression across all lands in Oregon.

The WRC acknowledges that "There are currently not enough resources or personnel capacity to provide all Oregon lands with adequate wildfire suppression capability," and proposes a "multi-billion dollar/multi-decade" plan to mitigate wildfires. But fire exclusion predicated on aggressive firefighting and fuels reduction across the landscape is an obsolete and unviable strategy for protecting rural communities and restoring forest ecosystems. This is particularly true given climate change that is increasing wildfire activity beyond human capacities to prevent or suppress all fires. The WRC offers false promises that its plan would adequately fund firefighting capacity sufficient to its unrealistic aims of total fire suppression for complete fire exclusion.

## **A Myopic Focus on Fighting Fires that Subverts the National Cohesive Wildland Fire Management Strategy**

As stated by the WRC:

"The focus of these recommendations is to *maximize firefighting effectiveness on lands identified for wildfire suppression* where the state of Oregon is directly responsible. In addition, these recommendations seek to improve coordination on those *land ownerships outside the state's direct responsibility* – with the shared goal of meeting the state's social, environmental and economic objectives while ensuring public and firefighter safety."

The WRC distorts the vision of the National Cohesive Wildland Fire Management Strategy (Cohesive Strategy) and its '*all lands, all hands, all options*' philosophy by advocating for essentially one option only--aggressive initial attack firefighting and full suppression--across all lands and agencies in Oregon. Aggressively attacking all ignitions in a vain attempt to extirpate fire from the landscape is physically impossible and financially unsustainable. If this goal were to be achieved, though, fire-adapted forest and grassland ecosystems would be radically altered and native fire-dependent species would become extinct. The natural beauty and abundant resources of Oregon's public wildlands would be degraded and diminished.

## **Eliminating All Opportunities for Ecological Fire Use**

A truly science-based and ecologically-oriented fire management strategy would plan and prepare for the *opportunities* that wildfires offer to reduce fuels and restore forests when conditions make for desired fire behavior and fire effects. However, the WRC advocates severe restrictions on "managed wildfire" (formerly called wildland fire use) on federal lands, proposing that fire use be allowed "only during low-risk wildfire conditions." The WRC intends to:

"Recommend the Governor and legislature endorse a joint resolution to inform all jurisdictions that initial attack and full suppression be the expected response strategy when conditions occur that are conducive of large wildfires and when PL levels reach 3 and above."

This restriction on ecological fire use would essentially banish this vital tool from the repertoire of wildfire responses, making suppression the only response possible.

Federal fire preparedness levels are determined by national considerations not local conditions, and there is an inherent contradiction for wildfire response: when wildfire activity is high but available suppression resources are low, agencies are compelled to attempt aggressive initial attack on all fires. But these are the conditions where firefighting is least effective and often impossible from a firefighter safety standpoint. In fact, in recent years many wilderness areas have been spared from the impacts of aggressive suppression because crews were unavailable and needed in other priority areas (such as the WUI zone) during high PL periods.

According to existing federal policy, it is the current and expected conditions of a fire and land management objectives that should determine the response to a given wildfire, not its ignition source or location. The WRC seeks to veto the Federal Wildland Fire Policy and its goal to integrate the natural role of fire in land management by mandating aggressive firefighting across all lands in Oregon.

### **Supporting Unsustainable Timber Management with Promises of Subsidized Fire Protection by Oregon Taxpayers**

Wildfire respects no jurisdictional boundaries that are often arbitrary lines on a map dividing a shared ecosystem, and historic property boundaries were not drawn with fire containment objectives in mind. Regardless, the WRC recommends that federal agencies "limit transfer of wildfire risk onto neighboring landowners." This means that wildfires that burn on federal lands should be fully contained and controlled to avoid spreading onto State, corporate, or private lands. This philosophy of 'zero tolerance' for accepting any fire from crossing boundaries puts all the pressure on federal agencies to aggressively suppress fires on public forests, often to protect private or corporate timberlands which have done nothing to prepare for fire. Even worse, corporate timberlands have created a more combustible landscape with their densely-stocked even-aged timber plantations that are designed for maximum timber extraction, not fire resilience in mind. All the costs and impacts of suppression are thus supposed to be borne by taxpayers and public lands, while requiring nothing from adjoining corporate land owners to reduce fire risks or fuel hazards on their lands.

### **Usurping Federal Land Managers' Authority and Undermining Progressive Fire Management Policy**

The WRC's proposals to allow managed wildfire only during low-risk conditions and limit the risk of fire crossing over federal boundaries would effectively eliminate any possibility of utilizing wildland fires for resource and ecological benefits. As such, these policy recommendations represent an extreme overreach of State authority, attempting to usurp federal agency authority and override federal fire policy by extending Oregon Department of Forestry's 'zero tolerance' fire philosophy to the National Parks and Monuments and National Forests in Oregon where fire is a vital process and useful tool in managing those lands.

The WRC rightly identifies problems on large-scale, multi-jurisdictional wildfires where Unified Command teams jointly share decision-making among State and federal agencies that have different policies, authorities, and missions. Its answer to this challenge is to impose the Oregon Department of Forestry's (ODF) total suppression response policy on all other agencies and lands. While it could be argued that aggressive suppression is an appropriate response on State

protected lands where vulnerable homes and communities are located, it is not a universally appropriate response for wildfires burning in remote wildlands and wilderness areas located on federal lands.

Apparently, the WRC aspires for the ODF to adopt the CalFire model of imposing aggressive suppression on all adjacent land ownerships, but ODF will never command the extensive resources and near-unlimited funding that CalFire does, nor should it. The CalFire model of being a 'municipal fire department in the woods' applying expensive 'heavy metal' firefighting tools on all fires is ecologically inappropriate and economically irrational for federal lands in Oregon, the vast majority of which are uninhabited wildlands where homes and communities are far away.

### **Fuels Reduction for Fire Suppression Avoids the Critical Need for Fire Reintroduction for Forest Restoration**

The WRC considers fuels reduction "the linchpin to the overall wildfire strategy," and calls for "incorporating suppression considerations to treat hazardous fuels." Again, the focus is on *firefighting for fire exclusion*, yet this conflicts with the ecological necessity to design fuels treatments that facilitate fire reintroduction and restoration of fire-adapted forests degraded by past fire exclusion. There is an urgent need for fuels treatments and fuelbreaks to help start prescribed fires and steer wildland fires, not just stop wildfires.

### **Investing in Private Contract Aircraft Fails to Recognize Critical Research Documenting the Inefficiency and Ineffectiveness of Aerial Firefighting**

One of the means the WRC advocates for increasing suppression capacity, especially in remote areas with rugged terrain, is increasing the use of aviation resources which it claims are "often the most effective means to fight fires on under and unprotected lands." The WRC presents a wishlist of aircraft from private contractors that it wants Oregon taxpayers to fund. This will make a few contractors lots of money, but it fails to acknowledge the latest research coming from the USFS Fire Science Lab in Missoula that documents how the use of aerial retardant is largely inefficient and ineffective in suppressing wildfires. At most, aviation resources can slow fire spread, but they cannot stop it or put it out without the use of ground crews constructing containment lines.

For the hefty price of aerial retardant dumped by airtankers, many more workers could be hired to serve on handcrews. These would be better investments of tax dollars than airtankers, not only because they would provide more jobs especially for rural workers, but also because handcrews are more flexible and versatile in fire management. Airtankers have just one use and ability: "put

the wet stuff on the red stuff," while handcrews can be used in a variety of fire management operations and projects, including managing wildfires with ecological fire use.

### **Fuels Reduction Biased Towards Corporate Timber Interests**

The WRC reveals a bias towards corporate timber interests in both its performance metrics for treating hazardous fuels, and its call for the public to pay for fire suppression that protects corporate timberlands. The metrics the WRC uses for fuels reduction treatments include:

- acres of slash piled and burned (slash is the waste product of logging)
- miles of treated roadsides for fuelbreaks (most forest roads were carved for logging, and midslope roads are typically unsafe and ineffective for use as firelines)
- miles of closed roads that are treated and opened as future fuelbreaks (in fact, roads provide access for most human-caused wildfires)
- acres harvested for fuel reduction purposes (commercial logging is counterproductive in reducing fire risks and fuel hazards. In fact, industrial operations far outnumber other sources of human-caused wildfire ignitions, and cutover lands invite more flammable invasive weeds, grasses, and brush to grow in place of the removed trees).

The WRC does not mention broadcast understory burning or non-commercial thinning to reduce excessive surface fuel loads that have accumulated due to past fire exclusion. Moreover, its calls for the public to "share the burden of paying for suppression" to protect corporate timberlands constitutes a de facto subsidy for private timber interests who rely on public agencies to protect their overstocked tree farms from wildfires rather than reduce fire hazards and prepare for fire on their own lands.

### **Conclusion: A Quixotic Pursuit of an Obsolete Worldview of Waging War on Wildfire**

The WRC calls for a public-private partnership led by the State in which, among several worthy actionable items, includes these wise words:

"The State must lead an honest discussion with its citizens, to recognize that wildfire is a condition of living in the West, which includes many ecological benefits."

Yet, despite this acknowledgement of ecological realism, the WRC failed to present a balanced, science-based, forward-looking vision of people safely and sustainably living with wildland fire in its myopic focus on fire suppression as the primary if not sole response to wildfires in Oregon. The WRC rightly warns that, "Oregon must prepare for increasingly complex and severe fire seasons by planning, budgeting, and allocating additional financial resources" as part of a multi-billion dollar, multi-decade strategy, but these valid needs are essentially welded to an excessive focus on firefighting as the primary strategy for wildfire response.

The National Cohesive Wildland Fire Management Strategy and the 10 strategic objectives that the WRC claims to be its "North Star" guiding future policy decisions are all likely to be

undermined by doubling down on the obsolescent fire exclusion paradigm. The WRC proposes the equivalent of using Polaris to navigate the ship of State while maintaining a 'flat-Earth' view of the planet. The occasional references to managed wildfire and the few positive policy proposals addressing the needs for land use zoning and building codes do not compensate for a document that is overwhelmingly opposed to wildland fire and seeks to extirpate it from the landscape--as if that were humanly possible.

We cannot sustain an endless and escalating "war" on wildfire, and the WRC proposal to ramp up fire suppression across all lands in a futile attempt to exclude all fires across the landscape is a recipe for disaster. The apparent desire to import the CalFire model of "heavy metal" firefighting with near-limitless State funding is not viable in Oregon (it's not viable in California, either). The point of diminishing returns where more investments in fire suppression resulted in less acres burned was passed decades ago. In fact, the opposite is rapidly unfolding before our eyes: the more blood and treasure we throw into aggressive firefighting as our first and only response to wildfires, the more firefighters' lives are lost and more homes are destroyed.

Progressive fire scientists and managers are advocating for a new paradigm of Ecological Fire Management that holds more promise of protecting rural communities, sustaining fire-adapted ecosystems, and preserving fire-dependent species. Oregon policymakers need to catch up with the best available ecological fire science and progressive fire policies to invest our limited tax dollars wisely by proactively planning and preparing for opportunities to *work with fire* rather than endlessly fight against it. In a warming world where large wildfires will become more frequent, we cannot afford it socially, economically, or ecologically to continue polluting the planet by burning fossil fuels while attacking burning forests to eliminate one of the Earth's vital natural processes. The WRC would do well to go back to the drawing board and send the Governor a new suite of policy recommendations that will enable Oregonians to safely coexist with wildland fire.