

For Now, Put All Unplanned Wildfire Ignitions Out Immediately; No Exceptions

Remember, “if you change nothing, nothing will change. Now is the time for change. Enough is enough.”

78
Contributors

**CALL TO
ACTION**



America’s Forests in the Balance: A National Emergency:¹ *A Call to Action*



**SEE PAGE 2 TABLE
OF CONTENTS: IT
WILL GUIDE YOU**

**8 CRITICAL
ACTIONS**

**IS IT TIME FOR A NEW
“10 AM” POLICY ?**

**SEE
PAGE 220**

REV. 17.7

**2024 WILDFIRE SEASON IS
WELL UNDERWAY**

THE COMMISSION’S REPORT, PAGE 151

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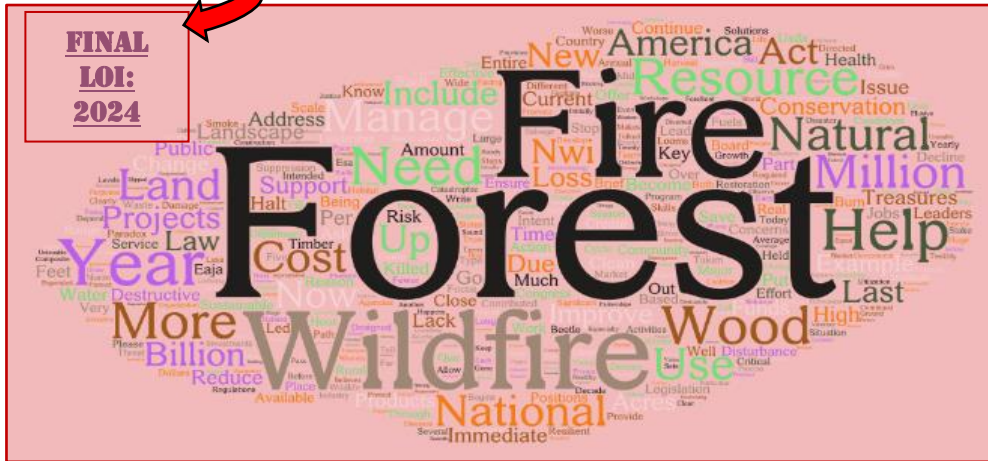
**2024
LETTER OF INTENT (LOI)
RECOMMENDATIONS**

**SEE PAGE 172, APPENDIX A.41. WOOD
PROCESSING INFRASTRUCTURE**

**APPENDIX A.21, A21.1
AND A.27:**

1. **NACO RESOLUTION**
2. **LOCAL INPUT**
3. **THE COMMISSION**

**FINAL
LOI:
2024**



**AT LEAST 27 PERCENT OF ALL
ACRES BURNED IN 2022
COULD HAVE BEEN AVOIDED;
SOME CONCLUDE AS HIGH AS
50 PERCENT! FOR NOW, WE
MUST STRIVE TO PUT OUT
ALL UNPLANNED WILDFIRES
WITHIN 24 HOURS OF
IGNITION. SEE APPENDIX
A.24.**

**SEE MURRY TAYLOR’S
LANDMARK ESSAY, PAGE 13.**

**A NATIONAL EMERGENCY: ABSOLUTELY!
GO TO PAGE 13 AND SEE THE PINELANDS, NJ**

**GLANCE AT
THE LOGIC SEQUENCE
SHOWN ON PAGE 8.**



**SEE APPENDIX
A.36, THE DEMISE
OF THE GREAT
WESTERN
FORESTS**

**PLEASE DON’T MISS
APPENDIX A.11: A
MULTI-AWARD-
WINNING MOVIE BY
RACHEL LEE HALL.
ALSO VIEW *WE THE
FOREST***

**REMEMBER THAT DIRECT WILDFIRE SUPPRESSION
COSTS REPRESENT ONLY A FRACTION OF THE TOTAL
LOSSES AND EXPENDITURES. KEEPING FIRES SMALL
IS KEY. SEE LOGIC SEQUENCE ON – PAGE 8.**

**FOR NOW, WE MUST STOP
THE CONCEPT OF
“MANAGED OR
BENEFICIAL FIRE”**

**SEE PAGE 15:
“SMOKE IS ALSO A
KILLER”**

The 2024 wildland fire season is well underway; 11,523 fires have burned 1,802,756 acres as of April 26, 2024. These amounts are well ahead of the same time in 2023. This *A Call to Action*, started almost four years ago, is an attempt to keep a National Emergency of unplanned wildfires at the forefront of the American people. To date, 78 professionals [and counting] have contributed to this *A Call to Action*. Sign-on to the *Petition* [Petition Link: <http://chnng.it/bGsyZvSbJ>]. As of April 27, 2024, there are 5,817 signatories. In 2022, 68,988 fires burned 7,577,183 acres. More wildfires ignited in 2022 than the past 10-year average; about 20 percent more. In 2023, 56,580 wildfires burned 2,698,910 acres. While the number of wildfires is slightly above the 10-year average, the number of acres burned is well below it; the 10-year average at 6,220,360 acres. Notable incidents in 2023 included the [Maui fire](#) and the [Smith River Complex](#) in California. This is not surprising. The lack of forest maintenance is the primary culprit. Please, continue to review the concept of “[managed or beneficial wildfire](#).” Do not be confused by intellectual arguments [please see page 100 for an explanation]. Putting all fires out immediately is cost effective; large fires are unimaginably expensive and destructive. Annual damages from unplanned wildfires are approaching \$1 trillion! Maybe it is time for a renewed, more contemporary “10 AM” policy by the USDA Forest Service. Let us not forget that smoke is also a horrendous killer. So, for now, it is critical to put all wildfires out quickly with an aggressive Initial Attack. The 2024 Annual Chief’s Letter of Intent is out! None of our recommendations seem to be included. Please see [Appendix A.48.4](#). America’s forestlands are at risk, let there be no doubt. Please, share your voice aggressively so we can begin to alter the direction of this destructive force – uncontrollable wildfires. **Note: A Call to Action is continually updated. This is Revision 17.7.**

¹ Prepared by Michael T. Rains with comments included from a wide-range of professionals; 78 and counting. This paper has been continually updated to address critical components, such as the lack of forest maintenance, the impacts of smoke, and the concept of “managed or beneficial wildfire” that contribute to this National Emergency of destructive wildfires. Last update of this revision of *A Call to Action*: 4/27/2024 12:12:56 PM. Please archive all previous versions [up to rev. 17.7].

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ALERT! Pay Special Attention to The Following:

-  **8 Critical Actions** Must Be Attained with Each Unplanned Wildfire.
-  **A Letter¹ to Congress** Asking for Support of Three [3] Key Points:
 1. Understand that we are faced with a National Emergency.
 2. Forest maintenance, especially on the National Forests, needs to be enhanced.
 3. Unplanned wildfires must be put out as quickly as possible.



- 🌳 [Appendix A.40](#). A more contemporary wildland fire suppression policy?
- 🌳 [Appendix A.48](#). Can You Imagine? America’s Chief Forester stating in the annual Letter of Intent [LOI] for Wildfire, that the “...USDA Forest Service will, for the foreseeable future, strive to put out all unplanned wildfires immediately.” What a powerful message that would be to the American people and a heightened credibility for the agency. [See also Appendix A.48.1](#), for the response and reply. Please see this!
- 🌳 [Appendix A.49](#). A meaningful history and tribute to Bruce Courtright.
- 🌳 [Appendix A.50](#). Another Critical “Thinkpiece.”

America’s Forests in the Balance: A National Emergency:

A Call to Action

Foreword. The very destructive 2022 wildfire season has been all but forgotten. About 69,000 fires burned over 7.5 million acres –more than the pace of 2021 *and* the 10-year average amounts! The 2023 fire season is finished; 54,273 fires have burned 2,627,112 acres; a temporary reprieve from 2022. This is not surprising. The 2024 fire season has already started – 10,199 fires have burned 1,774,404 acres as of April 19, 2024. The final tally, in terms of cost and destruction, is anyone’s guess. We know what to do to slow the destruction², yet we seem to halt at success, for some reason. For example, we seem to be stuck on the intellectual argument³ [see page 99, “Note”] of “managed or beneficial fires” [see also page 11] is currently a sound tactic. It is not, at least not NOW. Please focus on [Travel’s with Phil](#), page 141 and the new [Appendix A.47](#) to better understand this critical issue; “managed fire.”

“...A dominant Forest Service goal now and ahead, should be to put out all unplanned wildfire ignitions within 24 hours, no exceptions.” Please help make this a cornerstone of America’s Chief Forester’s annual Letter of Intent for Wildfire for the next decade, at least. The credibility this stance will afford the agency, if corporately deployed, will be immeasurable. We believe the American people expect this. The current landscape conditions will not enable “managed fires” or “beneficial fires” or a “let it burn” policy. They are not effective and indeed wasteful. Maybe it’s time for a renewed, more contemporary “10 AM” policy.”

Unfortunately, most still tend to forget the horrific destruction from the previous year [s] due to unplanned wildfires. The emphasis to adjust practices diminishes. Rhetorically, can most recall the Camp Fire and Paradise, California? What about Greenville?⁴ Or, the Dixie⁵ and Moose⁶ fires? And, the town of Weed [see [Appendix A.20](#)]? And, Maui [see [Appendix A.32](#)].

Last year, many states including California, Colorado, Kentucky, Oklahoma, Pennsylvania⁷ and West Virginia were in the wildfire caldron; more will be added in 2024. Count on it. As the Washington Post reported, the National Weather Service concluded, “...When it comes to wind and fire weather, there are bad days, really bad days, and really, really bad days,” the office tweeted. “Friday [April 22, 2022] is going to be a really, really bad day.” There will be other “really bad days.” Please help with this National Emergency. The same can be concluded with

the continuing updates of this document. The only thing that seems to change is the year and that is a terrible shame. We are better than this.

Yes, there has been some action and even additional funding secured. But still no cohesive approach has emerged. This is what the *A Call to Action* is trying to address: declare a National Emergency and form an effective coalition to address this National Emergency. That is, due to the lack of forest maintenance, wildfires have become larger and more destructive than ever before. This document outlines a way to resolution. Go to [Appendix A.13](#) to see the full “Transitioning the *A Call to Action* into 2024” text.

We are now in revision 17.6 of the *A Call to Action*. We continue to tell the story and seek desperately needed change. The debate on “managed fire” continues.⁸ There should be no debate; not NOW. The current landscape conditions will not allow “managed fires” or “beneficial fires” or a “let it burn” policy; period! See page 11 and [Appendix 24](#). This is a National Emergency, let there be no doubt. This and following Administrations must react effectively, now and ahead. There seems to be some proposed actions and even focused funding^{9,10}, but still no cohesive program direction. Additional rhetoric cannot be tolerated. Please aggressively share your voice for effective change, immediately! Perhaps it is time for a renewed, more contemporary “10 AM” policy: “...Use all available resources to carry out wildfire suppression with the purpose of extinguishing all wildfires detected on such lands no later than 10 AM after such a wildfire is detected and if not controlled by 10 AM, establish a new goal of extinguishment by 10 AM the next day or each succeeding day by increasing the availability of firefighting resources.”

“...Putting all fires out immediately is very cost effective; large fires are unimaginably expensive and destructive. On average, total economic losses can range between 15 to 30 times direct suppression costs. So, at this point in time, it is critical to put all fires out quickly with an aggressive Initial Attack. The losses in life and land from wildfires are completely unacceptable. It does not have to be this way. A *Call to Action* is required now. Please help!”

“...The *current wildfire situation* is a National Emergency, but may I suggest that *the current status of forests decline* is also a national emergency for our public federal forests that have been *under managed* for over 25+ years!”

...Ted Stubblefield, Forest Supervisor, United States Forest Service [Retired]

Executive Summary

The following represents *A Call to Action* -- a plea for a dedicated national effort to reduce the destructive impacts of uncontrollable wildfires. The *A Call to Action* – described in detail beginning on page [24](#) of this document, includes a:

- National Emergency Commitment.
- Statement of Intent [example].
- Vision.
- Strategy.
- 10-Year Plan of Work.

The majority of this document establishes the foundation for the *A Call to Action*.

Clearly, we are facing a national emergency: 90+ million acres, or more, of our national forestlands are at high-risk to large, destructive wildfires. Why? Because for over three decades, we have significantly underfunded forest maintenance work that could restore the health and resiliency of our landscapes and help prevent large, intense wildfires. By shifting money *from* sustainable forest maintenance actions *to* fire suppression, today’s forests have become overgrown and act like tinderboxes. These tinderboxes cause larger, hotter, faster burning blazes

A Key Point: The \$1.2 trillion Infrastructure and Investment Jobs Act, signed on November 15, 2021, includes \$3.3 billion for wildfire risk reduction. While the mixture of funds – about \$660 million annually for five years -- does not match the desired specifics illustrated on page 16 in this document, the total funds provided supports the *A Call to Action*. This is very good news. For reference, we shall keep the amounts illustrated on page 16 with its the emphasis on forest maintenance. Also, for reference, this added investment represents about 25 percent of minimal needs. Accordingly, this is a good start. Focusing investments is fundamental. We must keep the momentum going forward and very targeted approaches to make a true difference in forest maintenance.

that destroy everything in their path -- requiring billions of dollars each year to put out. It’s a vicious cycle, and it’s time we end it. How do we break the cycle? We solicit an aggressive commitment – *A Call to Action* -- from lawmakers to legislate and properly fund forest health maintenance work that creates and maintains a mosaic of vegetative stages that are productive and more resilient to catastrophic wildfire. By restoring the health of our landscapes, we break the cycle and help reduce the horrific destruction that these wildfires level against public health, infrastructure, and natural resources.

What can you do now? First, we all must better understand a *Logic Sequence* that enables fires to stay as small as possible. This is the foundation of the *A Call to Action*. This *Logic Sequence* is as follows:

Logic Sequence

Keeping Fires Small Logic Sequence



Forest Maintenance Helps Keep Fires Small:

- ✓ Small fires = less risk to firefighters and the local citizenry:
 - Putting all fires out immediately is very cost effective; large fires are unimaginably expensive and destructive. On average, total economic losses range between 15 to 30 times suppression costs. So, for the foreseeable future, it is critical to put all fires out immediately with an aggressive Initial Attack.
 - The concept of “managed wildfire”, for now, is simply an intellectual argument with mostly disastrous results:
 - Keeping fires small = saving valuable watershed values, including critical habitat for wildlife:
 - Keeping fires small = fewer smoke pollutants impacting nearby communities, as well as the firefighters themselves:
 - Well trained leaders at the local level = the best utilization of resources to keep fires small.

Please read this document that clearly establishes the foundation for *A Call to Action* and consider signing this [Petition](#). At the very least, aggressively share your voice of support in any way you feel is appropriate. We need your help.

Nothing changes if nothing changes. The 2022 fire season is a distant memory, exceeding the very destructive 2021 pace.¹¹ During the 2020 fire season, about 10.4 million acres burned. But it’s so much more than just acres burned. People are dying from fire and smoke, along with countless wildlife and domestic animals. Towns and communities are being wiped away. Stories of loss and grief are gut wrenching. The 2021 fire season was about as destructive as 2020. And, when we review the 2021 Omnibus Spending Bill that was approved, there is a status quo budget in terms of forest maintenance. Ditto for the 2022 and 2023 budgets, with minor exceptions. Yes, there are some investments planned for in the current infrastructure legislation [H.R. 3684] [+\$3.3 billion for a five-year plan], but these represent only about 25 percent of needs. With the exception of [H.R. 934](#), why are Congressional Representatives and Senators and other leaders not acknowledging this National Emergency? Together we can be a force to make a long-needed change for a long time. To this end, call your Members of Congress and advocate for expanded forest maintenance that enables healthy, resilient forests. Through legislation, funding and the optimization of our wildfire suppression strategies, we can dramatically decrease the threat of large, destructive wildfires.

While not as bad as 2022, the 2023 fire season was also very destructive. The 2024 fire season is roaring, literally. Use the following links to find contact information for lawmakers in your state and share your voice:

- **Senators:** https://www.senate.gov/general/contact_information/senators_cfm.cfm
- **Representatives:** <https://www.house.gov/representatives>
- **Governors:** <https://www.usa.gov/state-governor>
- **Mayors:** <https://www.usmayors.org/mayors/>

Intent of A *Call to Action*

The intent of this document is to establish the framework for *A Call to Action*. This *A Call to Action* is designed to reduce the impacts of large, intense wildfires on people’s lives, their communities, and lands along a rural to urban gradient resulting from lack of maintenance of America’s forests.¹² The results of this *A Call to Action* shall have a positive global impact, as well. The goal is to advance this *A Call to Action* to key decision-makers [i.e., the President of the United States; Members of Congress; USDA¹³ and DOI¹⁴ Secretaries; and other leaders] – as a way to secure support, advancement of the concepts presented and finally, deploy pragmatic actions.¹⁵ We cannot wait any longer for action. **We are facing a National Emergency.**

As of April 27, 2024, there are 5,817 signatories. 19, 2024 there are 5816 signatories. [Please consider signing on](#) or at least aggressively share your voice of support in any way that you feel appropriate, now.

COVID-19 Pandemic Update

When the original *A Call to Action* was written, there was no COVID-19 pandemic. To date in the United States, [111,820,082](#) cases and 1,219,847 deaths have been reported – an average of about 15 percent of the global totals.¹⁶ With the coronavirus pandemic and new variants of the virus continuing to collide head-on with the harshness of the wildfire seasons,^{17,18,19} fire suppression tactics and care for our firefighters and citizenry has to continually change; dramatically so.²⁰ This makes addressing *A Call to Action* even more urgent. Accordingly, even though the maintenance of forests remains the most important overall goal, as the COVID-19 pandemic is being fought throughout the world, the following are the “**Top 10 Actions**” that must be deployed now and for the foreseeable future:^{21,22}

1. Indications predict the 2024 fire season will be far more destructive than 2023, and the COVID-19 pandemic will certainly still be with us, now and ahead. We must understand this and act accordingly or thousands of people will needlessly become ill or die.²³
2. The concept of “managed wildfire” must be taken off the table for now; no exceptions [see detailed attention to this action on [page 11](#). Clear, unambiguous direction from the Forest Service Chief’s Office on this matter cannot be overstated. And, the direction must be corporately followed.
3. The goal is to put out every fire immediately.²⁴ Reduce response time by at least 80 percent!
4. Smoke is a killer; please know this. We must keep it to a minimum. See No. 3, above.^{25, 26}
5. More fully utilize smaller, more agile aircraft and helicopters. They come with much less people needed to effectively operate, thereby reducing the COVID-19 risk profile.
6. Use larger aircraft in a more appropriate role; their response time is slower. Keeping our focus on “Top 10 Action” No. 3 is key.

THIS IS KEY.

7. Fully utilize smokejumpers and other specialized firefighters to augment Initial Attack. [see page 25].
8. Pre-position resources much better than ever before. The current mantra must be: **“strive to be close to the incident, react quickly and put all wildfires out immediately.”**²⁷
9. Seek adequate funds for the United States Forest Service.²⁸ If only the COVID-19 pandemic and fire suppression tactics are addressed, the estimate is +\$1.7 billion. If delayed forest maintenance -- including hazardous fuels reduction -- is added, the *annual* cost is about +\$5.3 billion.²⁹ To be clear, the Forest Service does not have adequate funding to address the impacts of the historic 2022 year and what is projected to happen in 2023 without significant action by the United States Congress.^{30,31} See [Appendix A.1](#). Again, the lack of forest and wildland maintenance to enhance ecosystem productivity over the last 30 years cannot be over stated.³²
10. We must do all we can to keep people safe and well.

“... These are different times. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn anywhere, for whatever reason, for the foreseeable future, is unacceptable and must be stopped now; no exceptions.”

Faced with the added impacts of the COVID-19 pandemic and other safety concerns, there are three fundamental steps that are inextricably linked as we continued to move out of the 2023 fire season and into 2024:

- **Behave very differently** to remain safe. For example, the notion of traditional, large fire camps in the foreseeable future seems irresponsible.
- **Keep all fires small**³³ and put them out immediately; reduce smoke. Expand the concept of Prescribed Fire whenever possible.
- **Keep the focus on forest maintenance**, the ultimate “brass ring.” Over time, this will ensure America’s forests can become more resilient to disturbances; habitats are improved; forest mosaics become commonplace; and fires are smaller and less intense. And, the current national emergency can begin to dissipate and eventually end.

“...I try to point out the fact that if you’re not out conducting Rx fire [Prescribed Fire] right now, why in the hell do you think you could manage a fire for resource benefit[s].”
...Anonymous Forest Service Employee

THIS IS
KEY.

The Concept of *Managed Wildfire*

This concept deserves added attention and must be addressed head on.³⁴ Managed wildfires are natural ignitions [some refer to them as “unplanned”]³⁵ which under suitable weather and soil moisture conditions are allowed to burn to meet desired ecological objectives in Wilderness Areas only where pre-planned and approved in Forest Plans. This allows fire to play a natural role in restoring the ecosystems by recycling nutrients into the soil and clearing the forest floor of excessive debris. The key is to identify the right kind of fire

THIS IS
KEY.

at the right time at the right place. However, relying on natural ignitions to instantly create an opportunity for a managed wildfire in a random location, without adequate planning and pre-positioning for resources is like playing a game of Russian Roulette.³⁶ This is not to be confused with “Prescribed Fire” which is conducted under very specific conditions.

Item No. 2 on the list of “Top 10 Action” in this *A Call to Action* calls for – without exception – the elimination of “managed wildfires” for the foreseeable future. This includes Wilderness Areas. The reality is, with the clogged-up conditions of our forests; hard to predict weather events; and the extremely high level of expertise required to perfectly “herd” a wildfire, “managed wildfires” quickly become escaped fires. The notion of effectively directing a wildfire to help restore the forest has become largely an intellectual argument and puts others needlessly in harm’s way; causes deaths due to smoke inhalation; and, significantly increases fire suppression costs that continue to shift more funds away from badly needed traditional forest maintenance.³⁷

In 2021, with the risks associated with the COVID-19 pandemic, the notion of letting fires burn to help accrue forest restoration targets is unconscionable. The same has been true in 2022, 2023 and now, 2024. There is a strong connection between smoke inhalation and the more dire effects of Covid-19.³⁸ In addition, coronavirus cases in the U.S. have surged recently with the spread of the highly transmissible Delta and other variants.

Messages are very mixed.³⁹ On one hand, national direction from leaders seems to suggest no more “managed wildfires” due to current conditions. Events on the ground show a far different scenario. This misguidance may be due to available budgets. A steady flow of funding from fire suppression is being used to “manage wildfires” or in reality, attempt to manage a wildfire. The application of pre-approved and planned prescribed fire comes with a much more constrained budgetary account. Using an unplanned ignition as a de facto prescribed fire and claiming restoration credits is simply wrong. Perhaps an Office of Investigation [OIG] accounting of this practice is warranted.

As stated above, the practice of “managed wildfire”, especially in the western part of our country, is a huge gamble that can quickly accelerate to an “escaped fire.” This has become all too common in recent years, regardless of good intentions.^{40,41} And, regardless of weather and all the other “fire factors,” the practice of “managed wildfire” requires far too much knowledge and authority by the person making this immediate call; it’s not a fair fight. There are simply too many factors at risk. The unpredictability of the fire and its destruction in the current time and place will always win. As stated earlier, this is a practice that must be separated from prescribed burning.

The outcome of prescribed fire is much more predictable. In recent studies, prescribed fires have shown to be much safer and if deployed carefully can significantly help reduce hazardous fuels. Increased appropriations by Congress for prescribed burning is a critical step in the right direction.

The concept of *managed wildfire* must be stopped and the careful use of prescribed fire needs to be a key tool in a pragmatic forest maintenance regime. It is interesting to note that recently, an

extremely well-respected former Forest Supervisor for the Forest Service stated: “...If I were Chief, I would never allow *managed wildfires*; not this year, not EVER.”⁴²

"Managed wildfire" seems to be, as some have suggested, an intellectual theory⁴³ or argument, that should never ⁴⁴ be applied, while "prescribed fire" is a great tool that needs much more application and funding.”

Here is the bottom line: It is time to declare that all wildfires will be promptly and aggressively extinguished, period; no exceptions. Extremely clear direction is a must. And this direction must be corporately followed. For example, the word “manage” means: to handle or direct with a degree of skill: such as to exercise executive, administrative, and supervisory direction. To us, this means a very hands-on approach. Backing off to the “next best ridge”, while perhaps workable, can hardly be called a “hands on approach.”

On August 2, 2021, the newly appointed Forest Service Chief sent a letter⁴⁵ to his leadership team regarding the use of managed wildfires. The key points of the letter: managing wildfires for resource benefits is a strategy we will not use. In addition, until further notice, ignited prescribed fire operations will be considered only in specific geographic areas and only with approval by the national office.^{46, 47} We must be diligent to ensure that clear direction is followed, and for the foreseeable future, all wildfires are extinguished immediately; no exceptions. Unfortunately, the Chief’s letter is *not* being corporately followed. Examples include the Tamarack, Dixie and Caldor Fires in California.⁴⁸ In fact, America’s Chief Forester has published a letter on December 20, 2021 that seems to reverse his position on August 2, 2021, regarding “managed fire.” Nothing seems to change! This is unfortunate. At this point in time, it does not look like the [Forest Service will change its stance in 2023](#).⁴⁹ Updated, it has not!

Putting Them Out When Small – Is It Possible?

The simple answer is, “yes.” Not all the time, of course, but the goal for the foreseeable future is to put all fires out immediately; no exceptions. As Murry Taylor, former smokejumper, concludes in his critical essay, it’s possible with the right balance of ability and willingness; it’s called “task relevant maturity.” And, Merv George, Forest Supervisor, Rogue River–Siskiyou National Forest, has “it” – task relevant maturity in wildfire suppression. Also, see [Appendix A.16](#).

Murry Taylor’s Essay. Your views on controlling wildfires, in fire prone areas, will change when you read Murry Taylor’s essay: [How one Forest had 120 fires in the last two years but only burned a total of 70 acres - Wildfire Today](#). The essay also appearing in Smokejumper Magazine; it is very relevant and instructional.

A National Emergency with Global Implications

Currently, there are over one billion burnable acres of landscapes across America. And, during the last three decades or so, the size and intensity of wildfires has left a path of destruction with annual losses in wildfire-related damages to infrastructure, economic effects of evacuations and

lost tourism, public health, and natural resources estimated to be \$70 to \$350 billion each year.⁵⁰ On average, total economic losses can range between 15 to 30 times suppression costs.

So, it is critical to put all fires out immediately with an aggressive Initial Attack. But it is more than just acres burned or the size of the fire. As Ernesto Alvarado, professor of wildland fire at the University of Washington says, “...we must concentrate more on human losses.”^{51,52} Often, the human cost of wildfires has little to do with the fire size. For example, the Camp Fire, which burned more than 18,000 structures and killed 88 people in Paradise, California, isn’t even in the state’s top 20, ranked by acreage.

The Dixie Fire⁵³ in Northern California burned 963,309 acres before 100 percent containment [October 24, 2021]. The Dixie Fire started on July 14, 2021. 1,424 structures were destroyed or damaged [including the town Greenville]. On August 14, 2021 the [Caldor Fire](#)⁵⁴ in Northern California started. It burned 221,835 acres before being fully contained [October 21, 2021]. The Caldor Fire destroyed or damaged 1,084 structures. There were 5 known injuries. These three fires represent about 20 percent of the total acres burned to date. Now we are seeing the landscapes of New Mexico scorched.⁵⁵ And now Maui, Island of Hawaii. Clearly, fires are larger, more intense and much more destructive than ever before. *A Call to Action* is long overdue.

A 1,000-acre fire in the west may go almost unnoticed. The same size fire in the [Pinelands of New Jersey](#) would be a disaster.⁵⁶ Witness the recent fires in the east. See the piece on the destruction of [White Cedar](#) [“Ghost Forests”]. *All* of America’s forests are at risk. This is indeed a National Emergency.

Sometimes we take the power of healthy forests for granted. In addition to their role in helping reduce the intensity of wildfires, healthy forests reduce the impacts of a changing climate by offsetting as much as 20 percent of the country’s annual greenhouse gas emissions.⁵⁷ Healthy forests also reduce flooding by catching rainwater, creating permeable soils and reducing erosion. Healthy forests are crucial for good quality water and air. Over one-half of Americans depend on healthy forests to capture and filter their drinking water. Healthy forests remove millions of tons of pollutants each year helping to reduce respiratory problems, such as asthma and even premature death that pollutants may cause. Healthy forests create habitat for a wide array of plants and animals, including those in which their continued existence is threatened.

The degradation of America’s forests due to the lack of maintenance and the subsequent destruction by uncontrollable wildfires has brought us to a pivotal point. That is, a lowered capability of our forests to help mitigate the adverse impacts of a changing climate and produce the air and water we need to survive, is resulting in planetary conditions that are threatening the very existence of humans and wildlife. Simply put, without the protection that healthy forests provide, we are also jeopardizing the future of planet Earth.

For example, smoke from wildfires does not only affect people’s health, it can speed up the melting of polar icecaps. Particulate matter in smoke – soot -- settles on glaciers and darkens the ice surface, thereby speeding up melting as more of the sun’s heat is absorbed.

A growing body of research suggests that wildfire soot will contribute to accelerating the Arctic meltdown in the decades ahead.

With a projected rise in sea levels of about 2 meters [some predictions are higher] by 2100 – due to ice melting -- the impacts along coastal communities throughout the world will be devastating. According to research by Cornell University in 2017, “...2 billion people – about one-fifth of the world’s population – could become climate change refugees due to rising ocean levels by 2100.”⁵⁸ The social and economic impacts of this level of displacement is almost incalculable. As conservation leaders, we cannot stand by and allow this to take place. We must do all that can be done to mitigate the adverse impacts, now and ahead.

Declining forest health and large, high intensity wildfires that accompany this decline is *the* land conservation issue of our time. We must be vigilant. The lack of forest maintenance is a safety issue. It is an economic issue. It is a security issue. This lack of forest maintenance in America and the associated consequences is now a national emergency contributing to global degradation.

Discussion

In 2018, the *Camp Fire*^{59,60} wiped away the town of Paradise, California, “...burning homes, shops, restaurants, parks – many treasured pieces of an old mining town. It also left thousands of children displaced from their schools – at least from the campuses or even their teachers and peers.”⁶¹ 88 people perished. Other fires during the year accounted for over 2,000 civilian deaths. The 2018 fire season was horrific in terms of its destruction. But it was not that much different than what happened in 2017-2015; 2012-2011; 2009-2004; and, 2001-2000.⁶² 2019 proved to be somewhat of a reprieve overall, even though the number of fires and acres burned across the country were still significant⁶³. However, this *reprieve* has unfortunately become an anomaly. We cannot become complacent. The 2020 fire season was historic in its destruction. According to the [National Interagency Fire Center](#), there were about 57,000 fires and 10.4 million acres burned. The total *10-year average* is about 61,000 fires and about 6.7 million acres burned. The 2020 wildfire season is history. The loss of life, directly from fire and more indirectly from smoke inhalation, and destroyed towns and communities was horrific. This destruction continued in 2021 at times even at a *more destructive* pace.⁶⁴ For example, on August 14, 2021, the Dixie Fire -- currently, the second largest fire in California history [now 100 percent contained], destroyed the community of [Greenville](#). Respectfully, the current approach to wildfire management has become a bit stodgy.⁶⁵ The 2022 fire season was even more destructive. The 2023 fire season seems to have granted somewhat of a reprieve, but still we had [the Maui fires](#) and the [Smith River Complex](#). History has shown us that reprieves are only temporary. 2024 is already roaring. Simply put, enough is enough. It is time for all of us – from the President to Congress to government officials to state leaders, the local citizenry, and of course, America’s Chief Forester of the USDA Forest Service to garner the courage to stand up and begin to put an end to this horrific and totally unnecessary destruction.

Smoke is Also a Killer

Although it may not be as obvious as a raging inferno, smoke from wildfires is also a killer.^{66,67} America’s population is expected to decline between 2000 and 2100. However, the mortality

attributable to wildfire smoke is expected to triple between now and the end of the Century - from as much as 25,000 to about 75,000 deaths per year.⁶⁸ More conservative estimates show this range to be from about 15,000 to 44,000 annual deaths.^{69,70}

According to the US Climate and Health Alliance⁷¹, “...wildfire smoke is primarily made of carbon dioxide, water vapor, carbon monoxide, particulate matter, hydrocarbons and other organic chemicals, nitrogen oxides, and many other trace elements. Smoke composition can vary, depending on the fuel type, fire temperature, and wind conditions. Of these pollutants, “particulate matter [PM] is the most concerning, given their very small size and ability to be inhaled deeply into the lungs.” According to the Environmental Protection Agency⁷², numerous scientific studies have linked long-term PM_{2.5} [also called particle pollution] exposure to a variety of problems, including:

- Cancer.
- Stroke.
- Irregular heartbeat and heart attacks.
- Respiratory problems, such as irritation of the airways, coughing or difficulty breathing.
- Suicide risk in rural counties.⁷³

People with asthma, heart or lung diseases, children⁷⁴ and older adults are the most likely to be affected by particle pollution exposure.⁷⁵ Research is also showing that smoke from wildfires is also causing significant harm to skin health, accelerating skin aging and skin cancers.^{76,77,78}

According to atmospheric researchers, led by a team from Yale and Harvard, “The scope of the problem is immense: Over the next three decades, more than 300 counties in the West will see more severe smoke waves from wildfires, sometimes lasting weeks longer than in years past.”⁷⁹ An obvious and immediate concern should be the vulnerability of the first responders, our wildland firefighters. Now we have the COVID-19 pandemic to accentuate this issue.^{80, 81,82}

It's a Tie for the Top Spot

Large, high intensity wildfires throughout America – especially in the west – have created this national emergency. The three primary reasons are, with a tie for the top spot:

1. Lack of forest maintenance⁸³
1. The impacts of climate unpredictability^{84,85,86}
3. The expansion of the Wildland-Urban Interface

In some past writings on this subject, it has been stated that *the* primary culprit for the deterioration of America’s forests [reminding us all that *forests* represent more than trees]⁸⁷ and the incredible destruction caused by wildfires, is the *lack* of forest maintenance. Further, it was concluded that the impacts of a changing climate represents a real force, no doubt, but not the driving force. Lately, however, the lines between the two – impact of wildfires and impacts of an unpredictable and ever-changing climate on the warming of our planet have become much too blurred to make a rationale distinction; there probably is none. As Jad Daley, President and CEO

of American Forests concluded in his November 2018 article, “Climate Change = More Fire = More Climate Change.”⁸⁸ Or, as Bob Berwyn of Inside Climate News stated in his August 2018 news note, we are in a “vicious cycle when the results of warming produce yet more warming.”⁸⁹

The Paris Climate Agreement of 2015⁹⁰ and current discussions provide worldwide awareness, leadership and goals to help ensure post Industrial Revolution global warming would not exceed a +2°C threshold [from pre-Industrial Revolution levels]. To many, re-committing to the Paris Climate Agreement [also known as, the Paris Accord], our participation in the 2021 United Nations Climate Change Conference [Glasgow, Scotland, October 31, 2021-November 12, 2021], and current legislation has indicated to the world that the United States continues to care about global warming and its impacts on the health, economy and security of current and future generations. And, we must do our part.

Since 1895, temperatures in the United States have increased by about one-half degree Fahrenheit; some projections by mid-Century are plus 2 to 4 degrees.⁹¹ That’s huge. The consequences will be devastating. Whatever path is chosen to highlight our role, we must be vigilant and sustain our responsibility as visionary and scientific leaders to help mitigate the impacts of a changing climate. The Inflation Reduction Act of 2022⁹² will help, by accelerating U.S. emission cuts and put the country on a path to reduce greenhouse gases by 40 percent below 2005 levels by 2030. Expanded forest maintenance is crucial. Time is running out.

An estimated 120 million Americans in more than 46 million homes are at risk due to wildfire; 72,000 communities are directly in harm’s way. Thousands of heroic firefighters have died protecting people and property. How many more reasons does it take before we can begin to improve America’s forests so fire can eventually be used as a conservation tool and no longer feared for their destruction? We have a national emergency. The American people are calling for a solution. What is happening does not need to happen. We know what to do to stop this destruction. Now is the time for a *Call to Action*.

The National Fire Plan

It has been over 20 years since the report entitled, “Managing the Impacts of Wildfires on Communities and the Environment” [aka, the *National Fire Plan*] was written by the Departments of Agriculture and Interior. A critical feature of the *National Fire Plan* was “...hazardous fuels reduction improves forest health and its resiliency to fire.” Unfortunately, not much has changed since then. In fact, land conditions have deteriorated. For example, in 2001 there was an estimated 38 million acres on our National

ALERT: The current Administration’s Infrastructure and Investment Jobs Act has provided for +\$3.3 billion for wildfire risk reduction. This is a 5-year Bill, so we have to think more short-term and effectively link expenditures with the annual appropriations process. If asked, this is how the *A Call to Action* would have distributed the funding:

1. +\$3.047 billion for hazardous fuels treatment. With the current program, this brings the overall level to about \$1.1 billion annually from 2021-2026. The needs are greater but this would be a significant start.
2. +\$33 million for biomass uses and marketing for low value wood; a game changer!
3. +\$70 million for securing defensible space in high priority WUI area.
4. +\$250 million for prescribed fire – a key feature of forest maintenance.
5. +\$100 million for the stewardship on nonfederal forests adjacent to high-risk NFS lands; could not be more critical.

Forests considered to be at high risk from destructive wildfires. A recent analysis suggest the figure is about 90+ million acres; some suggest as high as 100 million acres.

A Funding Gap That Is Forever Increasing

As already stated, a primary culprit for this deterioration is the lack of forest maintenance. And, this is due in part to the lack of adequate resources, caused by 30+ years of shifting funds *from* maintenance actions *to* the fire suppression effort.

For example, about 65+ percent of the current Forest Service budget goes toward controlling fires. In 1995 this amount was about 16 percent. As more and more of the agency’s resources continue to be shifted to the fire effort, fewer funds are available to support forest maintenance work – the same restorative projects that reduce the fire threat. Clearly, a paradox has been created. As funds are shifted away from forest maintenance work, fires have become larger and much more destructive because forests are not being maintained. The loss of funds for forest maintenance over the last decades has not been restored to the Forest Service through the appropriation process. This gap equates to a *minimum* annual amount of about \$2.2 billion up to \$3.6 billion.⁹³ The specific *minimum* annual additional investment for just the Forest Service [+ \$2.2 billion] should be guided as follows:^{94,95,96,97}

- +\$97 million for “federally assisted state programs [the Forest Stewardship Program] to address the “...strengthening the stewardship of private lands”, as stated by USDA Secretary Perdue.
- +\$600 million for hazardous fuels reduction [this brings the overall level for the Forest Service to \$1.05 billion]. Not the \$2.4 billion per year called for in some estimates but an important increase none-the-less over the completely inadequate \$445.3 million.⁹⁸
- +\$26 million for fire science and technology development [including defensible space protection in the Wildland-Urban Interface].
- +\$45 million for the cooperative fire programs.
- +\$14 million for forest health protection [specifically, invasive species control].
- +\$1.385 billion for maintenance actions on the National Forests.
- +\$33 million for biomass uses that include wood-based nanotechnology [cellulose nanomaterials], specifically addressing low value wood, such as hazardous fuel.

The \$1.2 trillion Infrastructure and Investment Jobs Act, signed on November 15, 2021, included \$3.3 billion for wildfire risk reduction.⁹⁹ While the mixture of funds – about \$660 million annually for five years -- does not match the desired specifics illustrated on page 17 of this document, the total funds provided supports the *A Call to Action*. This is very good news. For reference, we shall keep the amounts illustrated on page 17 with its the emphasis on forest maintenance. Also, for reference, this added investment represents about 25 percent of minimal needs. Accordingly, this is a good start. But, we must keep the momentum going forward.

Caution: A “Fire Fix” is Not a “Forest Fix”

On March 23, 2018, H.R. 1625 [Consolidated Appropriations Act of 2018] was signed into law. This included the “Wildfire and Disaster Funding Adjustment” [Title I, Sec. 102], whereby

additional funds for wildfire emergencies shall be authorized from 2020 – 2027, ranging from \$2.25 to \$2.95 billion. These emergency funds are intended to halt the momentum-killing process known as “fire borrowing”, whereby funding for other programs are siphoned away for the fire effort. The Act would also halt the ever-increasing percentage of the overall United States Forest Service budget going to wildfire control by freezing the “10-year average” for fire suppression – a figure used by the Forest Service for budget development purposes -- at the 2015 level. These are all very good things. Accordingly, the action commonly referred to as the “fire fix” has been accomplished. However, we need to fully understand that the *fire fix* is only the first step toward a *forest fix*. Allow for an explanation.

In 1995, expenditures in fire equated to about 16 percent of the total Forest Service budget. It is now about 60+ percent. Over this span, there was a tremendous decline in forest maintenance [*maintenance*] work across the country. Everything – money, skills and emphasis -- was being shifted to the fire effort. The “fire fix” hopefully enables this shift to stop. Again, this is very good news.

However, it must be clear, the “fire fix” certainly does not backfill the huge gap that was created in lost non-fire skills and forest maintenance actions foregone, as examples, especially during the last two decades. Accordingly, it is important that this notion be recognized and new momentum be immediately established for the next step. That is, to deploy a comprehensive forest maintenance strategy so wildfires will be smaller and less destructive. This forest maintenance strategy will require new the funding levels outlined above. The 2021 “Omnibus Spending Bill” does not include these additional funds. Unless these funds are provided for, the “fire fix” will have little to do with helping reduce the impacts of large, intense wildfires, perhaps especially for the 90 million acres of National Forests that are now considered to be at high-risk from destructive wildfires.

As one Member of Congress succinctly concluded, “...It [the “fire fix”] doesn’t solve the problem. Solving the problem is stopping the damn fires, not spending more money to put them out once they get started.” Fundamentally, increased fire management requires aggressive forest maintenance. Otherwise, we simply spend more and more money to control wildfires, with no end in sight.

Lack of Forest Maintenance That Halts Resilient Vegetative Mosaics

At an August 16, 2018 Cabinet Meeting¹⁰⁰, the former President of the United States [Trump] spoke about the need to improve the *maintenance* of the forests. The former Secretary for the Department of Interior [Zinke] stated that the current situation of uncontrollable wildfires is due to “gross mismanagement [of the forests] for decades.” Actually, what former Secretary Zinke said was not true. It is not *gross mismanagement*. It is *little* or *no* management [i.e., maintenance]. Nobody knows how to manage forests better than the Forest Service. But, “...you cannot do when you do not have.”¹⁰¹

In a November 19, 2018 opinion piece entitled “...Who or What Is Really Responsible for the Huge Forest Fires in California? [by Bruce Bialosky],” a quote from Chris French, Deputy Chief

for the National Forest System, USDA Forest Service, stated: “the primary cause of the intense forest fires is the forests are overstocked. There are more trees than 100 years ago.”¹⁰²

Accounting for amounts of wood exports and imports, we essentially use each year about one-half of the wood that is produced from all our forestlands. That in itself has created a problem. Simply put, our forests are getting clogged up. Each year, about 317 billion board feet of new wood is produced from the forests and woodlands in the United States – 60 billion board feet from our National Forests.¹⁰³ The current harvest level from these National Forests, for example, is 3 billion board feet -- or about 5 percent of the annual growth. More biomass *can* and *should* be removed. Our forests – which are much more than just trees [for example the Chaparral Forests of Southern California] -- are getting stressed, they are dying, and are becoming a tinderbox for fire. And, once a fire gets a foothold, they become destructive behemoths that destroy everything in their paths. Productive ecosystems are being completely altered or destroyed. Simply put, more vegetation *can* and *should* be sustainably, economically, and safely removed from our forestlands.

But let’s be clear. This *A Call to Action* is not just about biomass production and uses. In fact, available biomass – including biochar as an example -- is simply a “by-product” of a much more dynamic approach to maintaining America’s forests. That is, the focus of expanded forest maintenance shall be on wildlife habitat condition treatments across very large landscapes. The goal shall be to create and maintain a mosaic of seral vegetative stages that are highly resistant to catastrophic fires, as well. That is, well-planned, methodical steps in the process of enabling productive ecological succession across priority watersheds that are especially high risk to wildfires. The 10-year plan-of-work in the *A Call to Action* will outline specific treatments that place wildlife habitat first and foremost across large geographic ecotypes and agency regional boundaries. Cooperation and collaborative approaches, with a wide-range of partnership, will be commonplace resulting in the eventual reduction of large, intense fires.¹⁰⁴

Forest Maintenance: Pace and Scale

Repeating, a dominant reason for the deterioration of America’s Forest and the incredible destruction caused by wildfires, is the lack of forest maintenance. But whenever the term “forest management” surfaces, there are many that conclude, “that’s just a coverup for “*indiscriminate logging*.” And, as former Forest Service Chief Jack Ward Thomas said, “gladiators form and fights ensue.” So, we are using the term “forest maintenance” to convey our intentions. To be clear, forest maintenance focuses on managing vegetation, restoring ecosystems, reducing hazards and maintaining forest health. vegetation management ¹⁰⁵ activities that will help improve habitat -- including timber harvesting, timely salvage, thinning, pruning and prescribed fire are fundamental to the maintenance of trees, forests and forest ecosystems and wildlife habitat conditions. Over the last 30 years, timber harvest levels, for example, have declined by about 80 percent. Excessive regulations, disguised as important to an *environmental movement* have in fact contributed to a reduction in environmental health.

Most who are in the profession of caring for the land along a rural to urban gradient, consider themselves *environmentalists*. But, with a *conservation* bent. That is, to keep our forests healthy, sustainable and more resilient to disturbances. Maintenance, protection and use – stewardship – is key. Doing nothing means nothing ever changes. Thus, we find ourselves in this current mess. We must embrace the notion of “Invest to Save.”¹⁰⁶

**IF
YOU
CHANGE
NOTHING,
NOTHING
WILL
CHANGE.**

Let there be no doubt, the health of America’s forests is declining. Wildfires are destroying lives and property, reducing air quality, altering critical wildlife habitat and killing millions of animals needlessly. Forests in declining health, the impacts of a changing climate, and the expanding Wildland-Urban Interface, has created a volatile mixture that has led to the current national emergency. Now, it is time to step forward with a concentrated effort and begin to address the 19-20 million acres annually of forests across our country that need some type of restorative action – about 8 million acres each year on the National Forests.

The goal of this restoration commitment is to help create healthy, sustainable forests that are more resilient to disturbances so the linkage between environmental health and community stability can be more fully realized.¹⁰⁷ See [Appendix A.3](#) for additional detail and tactics and [Appendix A.3.1](#) for examples.

Reduction in Hazardous Fuels

This large, fundamental task cannot be accomplished with such a meager level of funding. In the late 1990s, a General Accounting Office [GAO] report noted that “the most extensive and serious problem related to the health of forests in the interior West is the over-accumulation of vegetation, which has caused an increasing number of large, intense, uncontrollable, and catastrophically destructive wildfires.” When the *National Fire Plan* was written, it was thought that about \$850 million annually was the minimum required to more effectively address the issue of hazardous-fuels removal. More recently, a 2013 Congressional Research Service report suggests costs for a comprehensive hazardous fuels treatment program for the National Forests could exceed \$2 billion a year.

The point is, cost estimates to effectively address the removal of hazardous fuels range from about \$1 to \$2 billion dollars a year for just the Forest Service depending on the acres that can be treated. The current agency budget for this activity is about \$445 million. Thus, with only a fraction of required funds available, focusing work on the highest-priority areas is fundamental to success. But let’s be candid: no amount of focusing can offset this level of funding shortfall. Simply put: at the current investment level, the effort in reducing hazardous fuels is not making a difference that is even close to what is needed. A recent Farm Bill, authorized the collection of “excess KV funds,” termed K2, to be collected and used for varied needs throughout the geographic region in which collected. This created an opportunity by Forest Service to use such funding for desperately needed fuel reduction projects, specifically within the Wildland Urban Interface [WUI] where fire risks are great.

Advanced Biomass Uses

Most people are aware that traditional timber harvesting, thinning, and timely salvage of dead and dying trees, as examples, represent biomass removed and then used; shorthand for *biomass uses* and critical to forest resiliency. Recently, biomass uses have turned to more innovative solutions that offer opportunities for high-volume, high-value markets for lower quality wood.

For example, wood-based nanotechnology¹⁰⁸, a biomass use example, offers a revolutionary technology to create new jobs and strengthen America’s forest-based economy through industrial development and expansion as well as providing means to enable forests to remain healthy and sustainable through accelerated restoration. Wood-based nanotechnology applications include packaging barrier coatings; printing paper coatings; structural composite panels for construction; flexible electronic displays; printed electronics; lightweight structural and non-structural panels and parts for aerospace; automotive applications; and, a host of industrial tools and consumer products.

Other examples include innovations in the development, application and technology transfer of cross laminated timber – CLT¹⁰⁹ -- for use in nonresidential building construction. And, torrefied wood and biochar for energy. For example, torrefied wood and coal have similar heat producing capabilities and can generate electricity at about the same efficiency rate while torrefied wood emits significantly less particulate matter.

These science-based innovations are critical to forest maintenance, thus healthy forests. The greater the level of hazardous fuels that can be economically removed, the more efficient the forest maintenance campaign becomes.

It is estimated that a strong, well-established program in cost-effective biomass uses could create high-value markets from low-value wood [i.e., hazardous fuels] that could reasonably help restore about 20 million forested-acres annually. About one-half of the nation’s 885 million acres of forestland currently requires some type of restorative action. This pace and scale of restoration could reduce future fire suppression costs in the range of 12-15 percent [some say as high as 23 percent]. In terms of what the 2021 fire suppression expenditures were, this represents a savings of about \$1 billion! These are funds that could be redirected for vegetation maintenance uses, which will in turn help reduce the size and intensity of unwanted fires. Simply put, it makes good economic sense to aggressively invest in biomass uses to help achieve more resilient forests throughout the rural to urban land gradient. As stated earlier, funding in the range of \$33 million per year equates to a “strong, well-established program” in innovative biomass uses.¹¹⁰

Be Fire Wise and Safe

As the Wildland-Urban Interface [WUI] continues to expand across America, emphasizing the maintenance of vegetation and individual property care in the WUI will be a critical aspect of the *A Call to Action*. This includes helping expand the number of Fire Safe Councils¹¹¹, Fire Safe USA^{®112} sites, and defensible space around homes. And, any other tactics that will enable the WUI to be more resilient to fire in order to save lives and property. We know that “defensible

space” [also known as the “home ignition zone”] and preparing structures [“hardening”]¹¹³ is critical for the protection of homes from wildfire.¹¹⁴ Observe this wonderful example.¹¹⁵ Yet, less than 2 percent of the 72,000 communities at risk have been formally designated as fire wise and safe. The *A Call to Action* will help change this through activities that include, additional grants and funding; minimizing risks; improved insurability; application of K2 funding; and expanded partnerships with first responders. The short-term goal -- working with existing organizations -- is to provide additional funding to protect the highest priority areas, immediately. The long-term goal is to help enable at least one-half of all communities-at-risk to be designated *fire wise and safe*. This will require significant resources over a long period of time. See [Appendix A.2](#), for additional details.

Once again we must ask a driving question. That is, where is Congress on this serious financial need? As well, where is for example, NACo [the National Association of Counties] on this matter? Why are so many silent regarding the need for adequate forest maintenance funding?

Improved Aerial Fire Suppression Tactics

In 2013, the U.S. Government Accountability Office, in their Wildland Fire Maintenance report to Congress, recommended a nationwide, multi-year Aerial Firefighting Use and Effectiveness [AFUE] study. The study was chartered by the United States Forest Service to answer a pivotal question given the growing wildfire threat across America.^[1] That is, “...What are the best mixes of aircraft to do the fire suppression job?” AFUE findings included:

- The majority of retardant drops were completed by large aircraft [Large Air Tankers (LATs), Very Large Air Tankers (VLATs), Multi-Engine Scoopers (MES), and Type 1 helicopters] in an effort to control large wildfires, including those that were allowed to burn [i.e., “managed wildfires”] across landscapes to remove fuels.
- Smaller aircraft [i.e., Single-Engine Scoopers (Fire Bosses), Type 1, 2 and 3 helicopters, and retardant-dropping Single-Engine Air Tankers (SEATs)] were predominantly used to subdue small fires during Initial Attack (IA).
- Based on the results of the AFUE study, and following the parallels of the 2012 Rand Institute Study on “Determination and Cost-Benefit Analysis of the Optimal Mix of Helicopters and Airtankers for the USDA Forest Service”^[2], the Forest Service should be acknowledging that smaller, more agile “scooping” aerial firefighting assets such as single engine scoopers [i.e., Fire Bosses and others] can help fill the role to achieve goals and outcomes that are best suited for many fire prone western states.

If we intend to try to accomplish the “Top 10 Action” No 3 in the *A Call to Action*, [i.e., put out every fire immediately. Reduce response time by at least 80 percent!], fire agencies should lead with their amphibious IA aircraft without hesitation. Pre-positioning single engine amphibious tankers and Type 1, 2 and 3 helicopters in fire prone areas and respond as quickly as a fire is identified. Backfill these IA resources with LATs and VLATs and single engine airtankers dropping retardant when a fire breaks IA.

Accordingly, in this *A Call to Action*, another paradox has emerged. That is, since the concept of “[managed wildfire](#)” needs to be eliminated at least for now due to the ramifications of much

greater and destructive fires, the use of smaller aircraft to enable more cost-efficient and effective fire suppression needs to be expanded [“Top 10 Action” 2 and 3].

Here is what experience is telling us:

- Large airtankers certainly have a place in fire suppression efforts, but oftentimes they are not the most effective in helping achieve Goal No. 3 in the “A Call to Action”: “...Put out every fire immediately. Reduce response time by at least 80 percent!”
- Large airtankers are expensive and limited in number. There are 28 LATs or VLATs that can fight fires across the entire fire landscape in a given season.
- Due to these high costs, often times Incident Commanders are reticent to call for aerial assets and try to mitigate the fire risk without these assets, often with disastrous results.
- Smaller, more agile aircraft and helicopters are cost-efficient and effective.^[3]
- There are also significantly more of these smaller aircraft, with the number reaching to almost 100 retardant-dropping Single-Engine Air Tankers (SEATs) and 25 single engine scoopers [Fire Bosses]. This would allow for a simple and cost effective “network” of rapid response, Initial Attack assets to be positioned across much of the fire prone areas in a season.
- The firefighting agencies – federal, state and local – need to embrace a more agile, effective approach in aerial fire suppression tactics. Essentially, seek a better balance of aerial suppression tactics and a quick response force.
- A recent evaluation^[4] by this author suggests that up to 20 percent of the acres burned in 2020 [about 2 million acres] might have been avoided if a more agile, aerial approach to fire suppression would have been deployed throughout. Current estimates for 2021 suggest that figure is now closer to 25 percent [see [Appendix A.5](#)].
- A goal of 65 percent of all aerial wildfire firefighting tactics would probably be a more effective target for smaller aircraft usage.
- All the above should result in a greater reduction in exposure to Covid-19; less the need for fewer fire camps and fewer crews.

Improved Use of the Forest Service Smokejumper Cadre

It should also be noted that another critical feature of *Improved Aerial Fire Suppression Tactics* is the expanded use of Smokejumpers [“Top 10 Action” No. 7] in Initial Attack. In a recent article by Chuck Sheley¹¹⁶, a former Smokejumper, the following was a conclusion: “...reverse the trend and let smokejumpers be used as they were designed to be used in 1940 -- initial attack as soon as possible. USFS [United States Forest Service] smokejumper use in 2018 went down by over 300 fire jumps compared with the 10-year average.” In 2019, there were 604 *jumps*, down about 47 percent of the 10-year average of about 1,300. In 2020, and by all consensus a “horrible fire season,” *jumps* represented about 74 percent of the 10-year average [959 *jumps*].

A reduction of 26 percent from the 10-year average of fire jumps in one of the worst fire seasons on record, clearly needs to be discussed and evaluated.

It is our combined opinion that today’s Agency Administrators/Line Officers are not being adequately trained or informed of the valuable skills that Smokejumpers bring “to the table” for a quick reactionary force on fires at the point of Initial Attack.¹¹⁷

With the wildfires America is facing, and assuming safety protocols are being met, there should be few to **NO** available smokejumpers on the *daily status report*. We must maximize the use of these iconic resources, if at all where possible.

Again, the optimal use of aerial suppression tactics, including a fuller utilization of the Smokejumper force must be discussed, analyzed and determined to reduced damages and costs and save lives from wildfires. It seems clear that currently an optimal level on both tactics is not being attained.

A Call to Action

Conservation leaders are concluding that in order to “create healthy, sustainable forests that are more resilient to disturbances -- so the linkage between environmental health and community stability can be more fully realized” -- *A Call to Action* is required.¹¹⁸ That is, a well-coordinated partnership that bands together, shares resources and avoids duplication will ensure a successful campaign that improves our forests and the economy and protects lives and property.

This *A Call to Action* will include a:

- 1. National Emergency Commitment.**¹¹⁹ This shall include a formal declaration of an unprecedented national federal, state and local commitment to aggressively care for America’s forests along the complex rural to urban land gradient, so the destructive nature of large, high intensity wildfires will be reduced. The national commitment must address the current lack of resources that have dictated a lack of *forest maintenance*, resulting in the landscape scale destruction from wildfires that we are seeing every year. This cannot be overstated. Estimates suggest this amount is more than \$2 billion annually for just the Forest Service; some suggest as high as about \$5 billion. The total investment level for all involved shall be determined and budgeted. Leading the way for this national commitment will be a clear and powerful “Statement of Intent” to be issued jointly by the Secretaries of the Departments of Agriculture [USDA] and Interior [DOI]. Success of this national commitment will be enhanced by local and regional coalitions seeking to resolve common problems. Even with the horrific destruction from wildfires over the last decade, a *National Emergency declaration and commitment* has not been made. That simply seems unacceptable.

To this end, a Commission¹²⁰ has been proposed within the Public Law Number 117-58.¹²¹ Let us be very cautious, please. Under the current circumstances, there might be one positive benefit of a Commission to address the current wildfire issue. Allow me to explain.

During my [Rains] Forest Service career, I was involved in three Presidential Commissions. One, in my view, was extremely successful – the Northern Forests Lands Act. The goal was to address the maintenance of the northern forests of New England and New York.

A key part of this Commission was to assign the leadership to the four Governors. Whom in turn, assigned the tactics to some very good people. Local interest was assured. Many of the options proposed are still in effect today. Most would call this Commission a success.

A key point: Senator Leahy of Vermont laid the ground work; was well-liked and people were excited. To this point, look at some of the comments in recent Gabbert’s Wildfire blog; cynical beyond belief. In part, I do understand [the tone of the comments]. The issue of wildfires and wildfires management has so many plans and strategies already in place. For example:



1. The Quadrennial Reviews.
2. The *A Call to Action*.
3. *Toward Shared Stewardship Across Landscapes: An Outcome-Based Investment Strategy*
4. The 2014 *National Cohesive Wildland Fire Management Strategy*.
5. *ON FIRE: The Report of the Wildland Fire Mitigation and Management Commission*.

Simply put, we know what to do. Candidly, we do not need another *Commission* to outline what we already know and the proven actions that we do not seem to want to deploy.

Now, a Commission does have a key benefit. It can bring badly needed Executive awareness and attention to a problem. And, that can generate real gains – especially through the Appropriations process. To this end, Senator Leahy was respected and committed and real

Note: The Commission’s Report [No. 5, below] has been completed, September 27, 2023. See [Appendix A.37, page 149](#).

gains were achieved. That kind of Executive level leadership is critical to the success of any Commission.

Candidly, I do not see it with the “...Commission to evaluate wildland fire mitigation, management, and aircraft needs and use.” It feels to me as a political statement so the current Administration can say they are concerned about the results of inadequate forest maintenance across America and the resulting wildfires.

Look at the two key focal points of the proposed [now, new] Commission:¹²²

1. Develop recommendations to mitigate and manage wildland fires.
2. Report on aerial wildland firefighting equipment, strategy, and inventory.

As so many well know, we have more existing information on these two items than you can possibly imagine. We simply choose not to respond for a variety of reasons.

The Bottom Line: We do not need another Commission.¹²³ What we need is enhanced awareness by real “deciders” about the issue. And, we know what the issue is and how to solve it. Again, I refer you to the numerous Quadrennial Reviews; the current *A Call to*

Action; Toward Shared Stewardship Across Landscapes: An Outcome-Based Investment Strategy; and the 2014 National Cohesive Wildland Fire Management Strategy.

What we need is America’s Chief Forester to work with key “deciders” to deploy what we already know. This way, the Forest Service Chief *leads*. The other way – through a Commission – America’s Chief Forester waits and follows. The Chief knows what to do. Why not be aggressive and “...influence the deciders” NOW.¹²⁴

2. **Statement of Intent.** An example “Statement of Intent” is as follows:

“The lack of forest maintenance across the country has greatly contributed to the current wildfire situation and the associated horrific impacts on people’s lives and their communities. This is going to change. Immediately, we [USDA and DOI Secretaries] will be meeting with the current Administration leaders and Congress to gain adequate funding for the *Toward Shared Stewardship Across Landscapes: An Outcome-Based Investment Strategy*¹²⁵ and other corporately-used guides.

“...Fundamentally, increased fire management requires aggressive forest maintenance. Otherwise, we simply spend more and more money to control wildfires, with no end in sight.”

This will be the beginning of a long-term campaign to ensure our landscapes become healthy, sustainable and more resilient to disturbances. We will be counting on the aggressive, promotional leadership of everyone to ensure our direct and indirect roles in the stewardship of America’s forests is achieved, now and ahead. The Forest Service Chief and the Director of the Bureau of Land Management will be relentless in leading the way.”

3. **Vision.** The vision of the national commitment will be guided by the following: “To ensure America’s forests are healthy, sustainable and more resilient to disturbances in order to protect people, landscapes and communities from the destruction of large, high intensity wildfires.”
4. **Strategy.** The *A Call to Action* is the overall framework. *Toward Shared Stewardship Across Landscapes: An Outcome-Based Investment Strategy* can be a guiding strategy for the Forest Service.¹²⁶ This will be augmented by the 2014 *National Cohesive Wildland Fire Management Strategy*.¹²⁷ The overall approach shall include specific levels of vegetative maintenance to improve ecosystem health through actions such as hazardous fuel treatment, timely timber salvage, thinning, pruning, prescribed fire and reforestation. A focus shall be to create and maintain a mosaic of seral vegetative stages that are highly resistant to catastrophic fires and provide for quality wildlife habitat conditions. Quantifying associated outputs and expected outcomes with specific investment levels targeted to specific geographic areas [i.e., high priority watershed and landscapes] that are at high risk to wildfire shall be key.
5. **10-year Plan of Work.** A comprehensive 10-year Plan of Work shall be developed to deploy the *A Call to Action*. This Plan of Work will include monitoring and the annual evaluation of progress and outcomes, with adjustments as needed. The Plan of Work will need to include

detailed tactics, including additional investment strategies to increase the pace and scale of forest restoration; optimal fire suppression methods; agency workforce requirements; outlining of specific roles; identification and deployment of improved organizational processes; comprehensive reform maintenance; and the delineation of specific outcomes. These annual outcomes shall include, but not be limited to, the amounts of prescribed burning; targeted hazardous fuels reduction; increasing the production of traditional and innovative new forest products; the creation of varied wildlife habitat conditions; and reducing the backlog in critically needed reforestation.

Capacity to efficiently deploy significant new funding levels is a concern. This must be addressed now and this includes firefighters.¹²⁸ The very comprehensive “Increasing Workforce Capacity” report¹²⁹ developed by the National Association of Forest Service Retirees [NAFSR], as an example, provides a strong foundation for many elements of an effective 10-year Plan of Work for the *A Call to Action*. The decline of non-fire skills sets within the Forest Service over the last 30 years – about 40 percent -- cannot be overstated.

NAFSR has also produced a position paper entitled “America’s Forest Management Emergency – A National Catastrophe.” The details in this “A Call to Action” help augment NAFSR’s position paper.¹³⁰

On January 18, 2022, Agriculture Secretary Tom Vilsack and Forest Service Chief Randy Moore launch “Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America’s Forests.” See Appendix A.6.

WASHINGTON, Sept. 27, 2023 – The Wildland Fire Mitigation and Management Commission released [its report](#) outlining a comprehensive, consensus-based set of recommendations to Congress to address the nation’s wildfire crisis: *ON FIRE: The Report of the Wildland Fire Mitigation and Management Commission*.

Strategies are not a problem. We need a detailed, cohesive implementation plan with adequate funding for a “campaign of our campaign.”

Appendix A.1. Additional Cost Estimates to Address COVID-19, Effective Fires Suppression Tactics and Forest Maintenance.^{131,132,133,134}

Category	Amount
COVID-19:	\$ in millions
Supplies and Equipment [Protection and Care]	\$128.0
Planning and Response [On Incidents and Within the Community]	34.5
Infection Control [Identification and Mitigation]	88.6
Cost Recovery of Businesses Associated with Fire]	108.3
Behavior and Health Response [First Responders and Citizenry]	34.5
Medical Team [s] Assistance [Newly Established IC Teams]	44.3
Medical Assistance [Direct Assistance]	24.6
Medical Assistance [Insurance and Added Hospital Facilities]	19.7
Community Outreach [Technical Assistance to Ensure Safety]	9.8
COVID-19, Subtotal	492.4
Wildland Fire Suppression:	
Expanded Contracts for Shorter Response Times	579.6
Personnel [Additional to Keep Fires Small]	326.0
Personnel [Replacements Due to Sickness]	157.0
Community Assistance to Ensure and Deploy Defensible Space	69.5
Community Assistance For Structure Preparedness	320.0
Fire Suppression, Subtotal	1,452.2
Fire Suppression Plus COVID-19	1,944.6
Forest Maintenance:	
Hazardous Fuels Reduction [HFR], Subtotal	1,855.0
Fire Suppression, COVID-19 and HFR, Subtotal	3,799.6
Delayed Maintenance of Forestlands	1,755.0
Total Estimated Costs	\$5,554.6

Note: These additional cost estimates need to be inflated by 3.18 percent for a current total estimate of \$5.73 billion dollars.¹³⁵ The cost for expanded forest maintenance on public lands is \$3.72 billion per year for 5-7 years [including the 3.18 percent inflation adjustment] to show real change in forestland resiliency.

Appendix A.2. Cost Estimates to Address Defensible Space and Home Hardening Requirements¹³⁶

Assumptions:

1. Defensible Space [DS]:

- a. 1 community averages 600 homes and 50 percent of these homes need DS work: thus 300 homes per community at an average cost of \$1,750 per home:
 - 1 crew = 4 homes per month.
 - 1 month = 20 days; 1 day = 7 hours; 1 month = 140 hours of work per month.
 - 140 hours x \$50/hour = \$7,000.
 - $\$7,000 \div 4 = \$1,750$ per home for DS work.
 - 1 community = \$525,000 [$\$1,750 \times 300$ homes] for DS work.

2. Home Hardening [HH]:

- a. \$8,000 per home.
- b. 1 community averages 600 homes and the goal will be to Hardened [HH] 50 percent of the homes in each community served.
- c. 1 community will cost \$2.4 million [$(\$8,000 \times 600) \times 0.50$] to HH.

3. Total Communities:

- a. There are 72,000 communities at high risk to wildfire across the country. Only 2 percent have been designated as “fire wise and safe.” Thus, 70,560 communities need DS and HH.
- b. **Goal:** treat one-half of the total communities at risk to wildfire *and* in need of DS and HH work: 35,280 communities.
- c. Time period to accomplish work: 20 years [or, 1,764 communities treated annually].

4. Cost-share Requirement: 75 percent federal share/25 percent non-federal share.

5. Calculations:

- a. **DS:** $\$525,000 \times 1,764$ [communities] = \$926.1 million $\times 0.75 \sim$ \$694.6 million each year.
- b. **HH:** $\$2.4$ million $\times 1,764$ [communities] = \$4.2 billion $\times 0.75 \sim$ 3.2 billion each year.
- c. **Total Annual Federal Costs:** \sim \$3.85 billion.
- d. **Revised Amount in the “A Call to Action” for DS and HH [Appendix A.1]:** 10 percent of estimated costs to help comply with overall budget constraints: DS [\$69.5 million]; H [\$320 million] for a total of \$389.5 million for the first 5-7 years. As fire suppression costs decline, funds for DS and HH can increase.

6. Definitions:

- a. **Defensible Space.** Defensible space is the buffer between a building on your property and the grass, trees, shrubs, or any wildland area that surround it. This space is needed to slow or stop the spread of wildfire, helping protect your home from catching fire -- either from direct flame contact or radiant heat. Defensible space is also important for the protection of the firefighters defending your home.¹³⁷
- b. **Home Hardening.** Preparing your home to provide maximum wildfire protection with appropriate building materials and related design features. To provide maximum protection, home hardening must be used in combination with adequate defensible space.¹³⁸

Appendix A.3. Possible Forest Maintenance Tactics to Help Implement the *A Call to Action*¹³⁹

The *A Call to Action* specifies a clear pathway as to what is necessary, especially for the Appropriations needed, the immediate fire policies required, and political support needed. I [Aune] would like to take some time and specifically concentrate on the “how-to” aspect of getting on top of the current forest conditions exacerbated by tremendous overstocking and excessive fuel loading. We need to begin being prepared to discuss and present possible on-the-ground solutions.

Here are a few of my imperatives that must be achieved to change the behavior and actions of the United States Forest Service [USFS]:

1. As the *A Call to Action* clearly points out, immediately halt the use of *managed wildfire* for resource benefits, the so-called strategy of “monitoring wildland fires,” and other euphemisms currently used that lead to what is now regarded by many as “let burn” procedures and policies. This cessation of letting fires burn would be replaced with a rebirth of the “10 a.m. policy.”¹⁴⁰
2. This policy would be in place on every Ranger District west of the Mississippi River.
3. This policy would remain in place until Fire Condition Class III¹⁴¹ lands comprise less than 20 percent of a third-order watershed. Fire Condition Class [FCC] II¹⁴² lands should be reduced to no more than 30 percent of the same third-order watershed.¹⁴³ Reduce the existing FCC III and FCC II lands will require careful considerations of aspect, species, stocking levels, ground fuel conditions, slopes, past fire history, expected reentry periods and other key factors.
4. A network of Defensible Fuel Profile Zones (DFPZ)¹⁴⁴ located adjacent to roads and ridges shall be established and blocks of forested lands no greater than 5,000 acres within these third-order watersheds.
5. District Rangers would be required that within six months of establishing an action-oriented fuels reduction policy, to map and identify all of their appropriate third order watersheds, high priority Condition Classes, appropriate Defensible Fuel Profile Zones, and Wildland Urban Interface [WUI] lands.
6. Develop a ten-year plan focused on accomplishing the fuels reduction program based upon accomplishing the goals of the program on each of the Ranger Districts within a National Forest. This may not be feasible due to lack of funding, personnel needs or lack of skills necessary, availability of forest products firms, or other reasons that limit the capability to achieve full coverage. This will help establish the necessary local infrastructure needs. A companion fire-year action plan would be required to consider all of the available factors such as workforce, funding, mill capacity, etc. This would be similar to the 5-year Timber Sale Action Planning process that has been used in the past.
7. A suite of appropriate fuel reduction prescriptions will be developed that eliminate fuel ladder conditions, reduce stocking levels not to optimize growth, but reduce fuel loads and the potential for crown fires. WUI lands and DFPZ’s should be designed to look like an open park-like stand of forested conditions with the goal of keeping fires in these areas as ground fires with less than 3 to 5-foot flame lengths. The focus on all lands would be to reduce the

ground, ladder, and crown fuels to levels that are only suitable for ground fires during typical wildfire seasons.

8. Active use of all possible forest management practices including the use of prescribed fire will be included in the assessment and implementation of all of the previous requirements for fuel management and reduction programs.

The pathway to accomplishing all of the above is the *A Call to Action*. Further debates are not necessary. The only action left is the focus on implementation and accountability. There is no need to wait for a new computer program to analyze how much of the landscape to treat, what would be the most efficient suite of activities required, or where should treatments occur. In essence, implementation will be focused on:

1. Which trees to cut and which trees to leave. This is always the major question for any forest management program. What will be required is that the fuels management objectives will be paramount. Once that is established, the goals are essentially similar to experiences with forest management objectives designed to maximize growth and yield, economic returns, wildlife habitat objectives, or any other natural resource objective established for management of our National Forests or other forestlands. The goal will be to improve the resiliency of the forest while reducing the fuel problems as soon as possible. The goal will not be to regulate the forest in a classic forest management perspective. That can come later.
 - All forest management practices can and should be used to reduce excessive fuel loading including the use of Prescribed Fire with all of the proper controls and requirements under policies that have worked for the past 50+ years.
 - Tree harvesting prescriptions should focus on selecting the trees that have the best characteristic and strongest potential to survive a ground fire and prevent the development of crown fires. An analogy to use for similar approaches to selecting the best trees for fire survival is the development of prescriptions for a seed step shelterwood: The focus there is to select trees that have to potential for excellent seed-bearing characteristics and to develop wind firmness in the potential seed trees. All of the trees not meeting these desired characteristics for either the seed tree prep or the fuel reduction objectives are to be removed.
 - During the harvesting operations, concepts like whole tree yarding and delimbing at the landing should be used of all lands available for log processing machines. On cable ground, Yarding Unmerchantable Material (YUM),¹⁴⁵ should be required to reduce within stand fuel loads. Removal of chippable material and other non-saw log material should be considered if markets are available.
2. Post-sale activities should focus on ground fuels not removed in the harvesting operations. This would be the highest priority for all post-sale activities including reforestation.
3. Annually report to Congress the progress on accomplishing the fuels reduction program results in terms of Fire Condition Classes reduced and planned activities for the next five years.

Concern. The only significant barrier to accomplishing the aforesaid actions is the willingness to do it! All of the other so-called barriers are merely problems that can be overcome given the willingness to do it! As an example, mill-capacity! **One helpful solution:** Immediately eliminate log export restrictions and develop regulations that encourage exporting of logs.

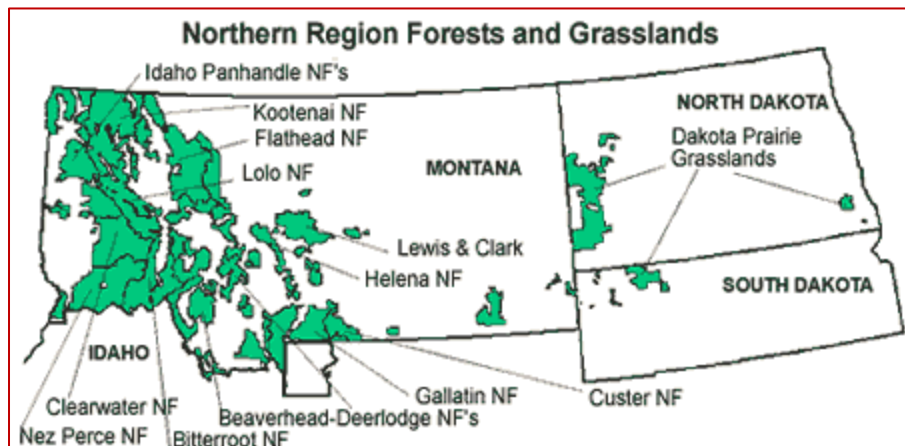
Appendix A.3.1. Possible Forest Maintenance Examples to Help Implement the *A Call to Action* [Companion Piece to Appendix A.3]¹⁴⁶

Specific Forest Maintenance

Examples. Appendix A.3, produced by Phil Aune, discusses concepts and tactics for expanded forest maintenance to more effectively deploy the *A Call to Action*. Appendix A.3.1 is a companion piece developed by Jim Marsh is an effort to support the foundation of the *A Call to Action* by providing actual examples in Region 1 of the United States

Forest Service. Other Forest Service Regions have similar activities that will help deploy the *A Call to Action*.

“...The Flathead National Forest in Region 1 has become a contemporary leader in forest maintenance, including the use of prescribed fire, to help effectively deploy the *Call to Action*.” As you read Appendix A.3.1, you will be struck by the abundance of available plans and strategies to address this National Emergency – large, destructive wildfires due to lack of forest maintenance. **The Driving Question:** Why is there a corporate hesitancy to garner and deploy adequate resources to solve this issue. Yes, it will take time. But now is the time.”



REGION 1. UNITED STATES FOREST SERVICE

The *A Call to Action* specifies a clear pathway as to what is necessary to help provide healthy, resilient forests across America’s landscapes, especially the added Federal and state appropriations needed; the immediate fire policies required; the corporate linkage of existing strategies; and essential political support.

Philip Aune explained in Appendix A.3 the “how-to” aspect of getting on top of the current forest conditions exacerbated by tremendous overstocking and excessive fuel loading. We need to begin being prepared to discuss and present possible on-the ground solutions. Here [Appendix A.3.1] are a few examples that actually illustrate [or refer to] and show the results of specific actions taken along the lines that are discussed in Appendix A.3.

Land and Resource Stewardship Program.¹⁴⁷ The Forest Service has the full authority to accomplish the forest [forests are more than just trees] maintenance actions discussed in this

entire document. However, the agency has been reluctant to fully achieve the results of the *Goals and Objectives of the Land Stewardship Program* as authorized by Congress. Let’s start by explaining the Land and Resource Stewardship Program.¹⁴⁸

Congress created the Land and Resource Stewardship Program to give the Forest Service [Department of Agriculture] and Bureau of Land Management [Department of Interior] the authority “to perform services to achieve land management goals for the national forests and the public lands that meet local and rural community needs.” The seven land management goals include:

1. Road and trail maintenance or obliteration to restore or maintain water quality.
2. Soil productivity, habitat for wildlife and fisheries, or other resource values.
3. Setting of prescribed fires to improve the composition, structure, condition, and health of stands or to improve wildlife habitat.
4. Removing vegetation or other activities to promote healthy forest stands, reduce fire hazards, or achieve other land management objectives.
5. Watershed restoration and maintenance.
6. Restoration and maintenance of wildlife and fish habitat.
7. Control of noxious and exotic weeds and reestablishing native plant species.

Stewardship Contracts may be used for treatments to improve, maintain, or restore forest or rangeland health; restore or maintain water quality; improve fish and wildlife habitat; and reduce hazardous fuels that pose risks to communities and ecosystem values.¹⁴⁹

The Good Neighbor Authority.¹⁵⁰ Through Shared Stewardship, the Forest Service is coming together with tribal governments, states, and other partners to address these challenges and explore opportunities to improve forest health and resiliency across a wide-range of landscapes. This *Good Neighbor Authority* allows the Forest Service and the Bureau of Land Management to authorize states, counties, and federally recognized Indian tribes to conduct certain projects on federal lands in pursuit of specified land management goals (16 U.S.C. §2113a).¹⁵¹

Stewardship Contracts vs. Timber Sale Contracts. First, all stewardship contracts and agreements include both forest product removal and service work items. Stewardship work is also awarded on a “best value” basis, and excess funds remain on the forest as “retained receipts,” whereas timber contracts go to the highest bidder and excess funds are returned to the United States Treasury or collected in trust funds.

Master Stewardship Agreements [MSAs] with Supplemental Project Agreements [SPAs] are used to designate large areas, typically at the regional level, where a series of projects may take place across a landscape, and may be entered into at the region or forest level. SPAs tier from a MSAs and outline the details of a specific project. SPAs cannot serve as standalone agreements. MSAs with SPAs are useful mechanisms for partners who intend to have multiple stewardship agreements with the agency. These MSAs are typically tiered from the National Forest Plans.¹⁵²

In the Bureau of Land Management. “Stewardship” refers to the ability to trade forest products for land management and services. For example, in exchange for thinning the forest and keeping the trees to sell, a contractor or organization performs service-work that helps to achieve

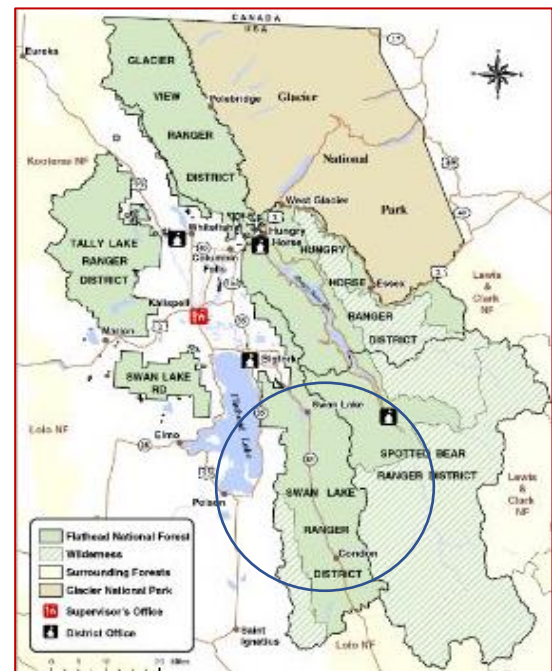
key land management goals such as improving wildlife habitat or reestablishing native plant species. The intent of stewardship is to improve, maintain, or restore forest or rangeland health; restore or maintain water quality; improve fish and wildlife habitat and reduce danger from wildfires.

Stewardship projects are created through an open, collaborative process that involved local communities and interested organizations. Stewardship contracting authority includes agreements with nonprofits, best-value contracts, and always include a goods for services arrangement. Congress permanently authorized stewardship contracting through the 2014 Farm Bill, ensuring that the Forest Service and Bureau of Land Management will always have this valuable tool available.

The most important aspect of Stewardship Authority, is that the Forest Service and Bureau of Land Management can use the value of the natural resources themselves and not depend upon the Annual Congressional Appropriation Process which has been highly influenced by non-partisan politics and woefully underfunded for well over three decades.

Example:

The Dewey Stewardship Sale Project^{153,154} on the Swan Lake Ranger District is one of several projects on the Flathead National Forest that are excellent examples of forest maintenance to improved forest resiliency -- albeit may differ due the geographic differences from other stewardship projects across other Regions of the America. This specific project includes broadcast burning in timber harvest units located within the Wild Bill drainage near Blacktail Mountain south of Kila, MT. These treatments will use prescribed fire for fuels reduction, vegetation regeneration, and wildlife habitat improvements – a terrific strategy to help reduce large, high intensity wildfires. The Flathead National Forest has become a national leader in forest maintenance. America is grateful.



There are some concerns. The Stewardship Authority has had lots of growing pains in the United States

Forest Service and the Bureau of Land Management. And, several shortfalls in execution, as discussed by Cassandra Hemphill, Dissertation 2015, and the University of Montana.¹⁵⁵

The Forest Service, Region 1 and Montana Department of Natural Resources has common Goals and Objectives¹⁵⁶ which have made it easy for the two land management agencies to work together on several small and large landscape scale programs and projects. With adequate resources, more of these projects could be pursued to increase the ability of this joint venture to further manage, protect, and ensure forested landscape become more resilient to large,

REGION 1. THE FLATHEAD NATIONAL FOREST: SWAN LAKE RANGER DISTRICT, DIXIE STEWARDSHIP SALE PROJECT

destructive wildfires. And encourage private land owners and organizations to collaborate for a common purpose.

The Forest Plan. As one can see from the map above, there are lots of mixed ownership that can provide great protection from wildland fire with a cohesive program. The *A Call to Action* provides the foundation for this cohesive approach as augmented by the Flathead National Forest Plan.¹⁵⁷

“Fire managers strive to manage the natural role of fire while protecting values from adverse impacts of fire. This can be accomplished by implementing a coordinated risk management approach to promote landscapes that are resilient to fire-related disturbances and preparing for and executing a safe, effective, and efficient response to fire. Treatment of vegetation for fuels mitigation should focus on creating conditions in which fire can occur without devastating

consequences. Treatments focus on restoring and maintaining natural fire regimes and reducing the negative impacts of wildfires to watershed health, wildlife habitat, and community values at risk. Refer also to the Terrestrial Ecosystems and Vegetation section for plan components related to vegetation treatments; these also apply to fuel reduction treatments.”¹⁵⁸

State Plans. The Montana Forest Action Plan also provides a strong strategy, in concert with the National Forest Plan to address the *A Call to Action* and effectively address this National Emergency.¹⁵⁹

“While fire will always play an important and necessary natural role in Montana’s forests, the current state of the forests has created a fire-prone landscape more susceptible to high-severity wildfires. Today, over 85 percent of Montana’s forests are at elevated risk of wildfire (DNRC, 2020). Similar to other states throughout the West, Montana’s fire seasons are becoming longer and more severe (Holden et al., 2018). More than ever, Montana now experiences megafires (fires over 100,000 acres) and the average fire season is 40 days longer than it was 30 years ago (Freeborn et al., 2016).”¹⁶⁰

“Prioritize lands within Priority Areas for Focused Attention when planning wildfire risk reduction projects and increase community protection efforts by promoting active forest management on landscapes adjacent to high-risk WUI areas.

Use the Montana Wildfire Risk Assessment¹⁶¹ to focus community risk reduction, community preparedness, fire adaptation, and watershed protection efforts on areas of greatest risk within the Priority Areas for Focused Attention. Invest in agency capacity to implement a variety of treatment types, including mechanical treatment, prescribed fire, and grazing, to increase the pace and scale of hazardous fuels treatments in Priority Areas for Focused Attention.”¹⁶²

Community Wildfire Protection Plan [CWPP], Flathead County, 2022.¹⁶³ “...Future efforts in planning and implementation of prevention, mitigation, and response projects should be closely coordinated with Fire Safe Flathead and their cooperating partners; MT-DNRC¹⁶⁴, Forest Service, Glacier National Park, Flathead County, and Flathead County Fire Departments. It is likely that some projects would be more effective if implemented on the lands of two or more

jurisdictions rather than by a single entity. Cooperation and coordination will also result in avoiding duplicating efforts or overlooking opportunities to protect values at risk. In an effort to reduce new fire starts during periods of very high or extreme fire danger, there is a statewide process for instituting fire restrictions and closures by zone in the Northern Rockies Geographic area. Flathead County and its co-operators are coordinated in this process through the Northwest

Zone of the Northern Rockies Coordinating Center, to ensure close communications and common actions occur during critical periods of fire danger.”¹⁶⁵

Lincoln County, Montana.¹⁶⁶ There are numerous sources that can help with shared stewardship – even at a small, local level. A world class source of information is the Evergreen Foundation under the leadership of Jim Petersen.¹⁶⁷

On August 6, 2021, Evergreen posted “Counties on Fire, Lincoln County, Montana. It was a call to action to create forest-to-community health within the Wildland Urban Interface and an overview of the current state of the forest, wildlife risk, needed treatment, and landowner and community resources in Lincoln County. It is a classic on what needs to be done to help address this National Emergency in a local area. And what if all the local areas banded together under *A Call to Action* to cohesively address this National Emergency we have but seem to not be able to corporately face?

Appendix A.4. An Email to a Wide Range of Interests in Wildfires¹⁶⁸

Note: The following is an email I sent to a wide-range of interests. I was encouraged to include this is the *A Call to Action*. **The basic premise:** things have changed. The Driving Question is: Why can’t our approach to wildfire suppression also change? The email begins as follows:

Democracy sure can be inefficient, to be sure. But it is a great concept, no doubt.

I would like to respond to your message by referring to the Murry Taylor’s piece – “...*How one Forest had 120 fires in the last two years but only burned a total of 70 acre: Standing tall and making a difference on the Rogue River–Siskiyou National Forest.*” To be sure, it is a very instructional piece. My compliments to Murry. **Web Link:** [How one Forest had 120 fires in the last two years but only burned a total of 70 acres - Wildfire Today](#)

And, letting you know that under the right circumstance, letting a fire burn “...to the next best ridge” can be helpful. But NOT NOW.¹⁶⁹

In the current “A Call to Action” [rev. 16.5], there are two “call out” boxes that are very informative. These are:

“... These are different times. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn anywhere, for whatever reason, for the foreseeable future, is unacceptable and must be stopped now; no exceptions.”

“...Putting all fires out immediately is very cost effective; large fires are unimaginably expensive and destructive. On average, total economic losses can range between 15 to 30 times direct suppression costs. So, at this point in time, it is critical to put all fires out quickly with an aggressive Initial Attack. The losses in life and land from wildfires are completely unacceptable. It does not have to be this way. A *Call to Action* is required now. Please help!”

The aforesaid two conclusions are from a person who wrote an essay in 2018 entitled, “...Restoring Fire as a Landscape Conservation Tool: Nontraditional Thought for a Traditional Organization.” Then, the fire seasons of 2020 and 2021 emerged. Since that essay was written, I have consistently said, “...but NOT NOW.” I thought the recent piece by

Murry Taylor included a line that said it all: “...it’s clear that, for the time being, we need to put out all fires during fire

season as quickly as possible.” I keep asking myself, “...why is it so hard to understand that things have dramatically changed with the [it’s a tie for a top spot]:

2. Lack of forest maintenance over the past three decades.
2. Impacts of a changing climate.
3. Expansion of the Wildland-Urban Interface.

Why cannot we [the American people] collectively understand that with these dramatic changes, our past approaches to “fire management” much change – at least for the time being. For now, the concept of “managed fire” or letting the fire burn “...to the next best ridge” is a fool’s errand. It must be stopped; no exceptions.

Recently, I wrote a piece entitled, “...Caring for Our Forests: The Key to Less Destructive Wildfires”. It talks, in part, about local people in harm’s way. It is very easy to intellectualize an argument about the benefits of added fire on the landscape when you are not in the eye of the storm. But people in Placerville, Sly Park and Pollock Pines California, for example, simply want the fires to be put out immediately and do not understand why they cannot be [put out immediately].

In the “A Call to Action”, there are ten action items. The following four I read almost every day:

2. The concept of “managed fires” must be taken off the table for now; no exceptions.
3. The goal is to put out every fire immediately. Reduce response time by 80 percent!
4. Smoke is also a killer. We must keep it to a minimum.
7. Fully utilize smokejumpers and other specialized firefighters to augment Initial Attack.

There is a very important statement in Murry Taylor’s piece. It says: “...When it comes to safety, this is something Merv George Jr. [Forest Supervisor of the Rogue River–Siskiyou National Forest] thinks about a lot. It’s a calculated risk to encourage vigorous IA [Initial Attack], since it can mean extra exposure early in most fire suppression efforts. Such actions can put people in harm’s way. But, to hold back and risk a fire growing large where it can really do a lot of damage for a long duration, is not—in Merv’s opinion—the most responsible choice.”

Further, “...as Merv made clear, we all know that fire needs to be returned to the forest landscape. The Rogue River-Siskiyou N.F. is on pace to have a record year with prescribed fire. But fire does NOT need to be there in summers of record low fuel moistures and record high fire danger, or in the hottest times of the year. These fires must be put out early and fast.”

For me, that pretty much sums it up: for the time being, under the current conditions we are facing, putting all fires out immediately – not exceptions – is the answer.

Some say the wildfire problem in the West is the most important environmental issue of our time. They’re right. Actually, it is a national emergency. The piece by Murry Taylor describes the issue perfectly. The “A Call to Action” charts a way. Current proposed legislation by Congress could provide important funding to address this national emergency.

Simply put, there is a perfect storm developing. It is time for America’s Chief Forester to take the mantle and lead this effort. He can. I know he can. His name is Randy Moore. He could be the “...legacy Chief” for the United States Forest Service if he aggressively addresses the tenants of the “A Call to Action.” Call him through roseanna.wary@usda.gov. Let him hear your voice. I will do the same.

Appendix A.5. Calculations of Acres That Should Not Have Burned in 2020.¹⁷⁰

Context: A recent evaluation by this author suggested that up to 20 percent of the acres burned in 2020 [about 2 million acres] might have been avoided if a more agile, aerial approach to fire suppression would have been deployed throughout. Current estimates for 2021 suggest that figure is now closer to 25 percent. I was asked for my calculations. There were two questions: first, the “20 percent statement” on page 22. And, a second water quality question. The following is my response:

Allow me to attempt to answer your two questions. **First, the second question:** For me this is easy.

Earlier in my career with the Forest Service I was a hydrologist on the [Plumas, Six Rivers (both in California) and the Grand Mesa-Uncompahgre (Colorado)]. In simple terms, fires increase sedimentation into waters. A nice link for me is by the United States Geological Survey: <https://ca.water.usgs.gov/wildfires/wildfires-water-quality.html>

This issue is largely unquestioned. Sedimentation, smoke contaminants, leaching from retardants; heat island impacts due to loss of vegetation; impacts of a changing climate; watershed efficiency; restoration costs delayed, lack of forest maintenance over the past 30+ years – I could go on and on. Simply put, wildfires and improved [or at least sustained] water quality do not mix. And with about 80 percent of the freshwater supply in our country originating from forest lands, this makes forest maintenance – the single item we have the most control over at this point in time -- ever so more critical to help reduce large, intense wildfires. This notion is largely accepted. Why we seem to be so reluctant to address this is unclear, thus my “A Call to Action.”

The first question [from the inquirer]: “...Your point on page 22 that I have highlighted is of interest to me. Can you send me the math behind it? It’s the section about how we could have reduced the acres burned by 2million acres!!.” **My response:** This is a bit more difficult.

I looked up as much research as I could and came up with weighted factors based on published science; my experience; talking to experts; and some intuition. I did these on a plus [+] and minus [-] basis:

Plus [Loss of Additional (+) Acres]:

1. Larger Aerial Inefficiency: $+25 \text{ [percent]} \times 1.5 \text{ [weighted factor due to criticality and control]} = +37.5$
2. Fife Fighter Skill Set Reduction [over time]: $+5 \times 1.0 = +5.0$
3. COVID-19 Impacts: $+10 \times 1.5 = +15.0$
4. “Managed Fire” Escapes”: $+20 \times 2 = +40.0$
5. WUI Influence: $+10 \times 1.5 = +15.0$

Subtotal: +112.5

Minus [Less (-) Acres Burned, *if* Better Addressed]:

1. Climate Change: $-10 \times 1.5 = -15.0$
2. Lack of Forest Maintenance: $-35 \times 2 = -70.0$

Subtotal: -85.0

Difference: $+112.5 + (-85.0) = +27.0$ (percent). Rounded to +20 percent to allow for error adjustments [see page 22 of the “A Call to Action”]:

Thesis: Do a better job by reducing the “plus” categories and less acres will be burned. For example, reduced the +37 percent inefficiency in “Larger Aerial Tactics Inefficiency” by using small more agile aircraft [“top 10” Action No. 5 in the “A Call to Action”].

Anyway, that is the basis of my calculations. If someone has something better, I can replace in the next revision of the “A Call to Action.”

Note: I [Rains] strive to ensure that every number in the “A Call to Action” is cited or at least has some rationale behind it/them, in case anyone wants to challenge or provide a better figure/figures.

As I always say, “...I give way to superior expertise.” So, you know, my 20 percent figure [page 22 of the latest “A Call to Action”-- or over 2 million acres in 2021] of acres that did not have to burn due to inefficiencies -- is conservative. **By my own calculations, it is 27 percent.** But I thought I would error on the side of caution. Thus, my 20 percent figure. I stand by it!

Think about it! One-fourth of the unplanned wildfire acres burned, did not have to burn. Think of the unnecessary resource destruction and loss of lives.

Appendix A.6. 10-Year Strategy to Confront the Wildfire Crisis [United States Forest Service]: Wildfire Crisis Strategy Implementation Plan (usda.gov)

PHOENIX, Jan. 18, 2022 – Agriculture Secretary Tom Vilsack and Forest Service Chief Randy Moore will today launch a comprehensive response to the nation’s growing wildfire crisis – “**Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America’s Forests.**” The strategy outlines the need to significantly increase fuels and forest health treatments to address the escalating crisis of wildfire danger that threatens millions of acres and numerous communities across the United States.

The Forest Service will work with other federal agencies, including the Department of the Interior, and with Tribes, states, local communities, private landowners, and other partners to focus fuels and forest health treatments more strategically and at the scale of the problem, based on the best available science.

The strategy highlights new research on what Forest Service scientists identified as high risk “firesheds” – large, forested landscapes with a high likelihood that an ignition could expose homes, communities, infrastructure and natural resources to wildfire. Firesheds, typically about 250,000 acres in size, are mapped to match the scale of community exposure to wildfire.

The Forest Service will use this risk-based information to engage with partners and create shared priorities for landscape scale work, to equitably and meaningfully change the trajectory of risk for people, communities and natural resources, including areas important for water, carbon and wildlife.

The groundwork in this new strategy will begin in areas identified as being at the highest risk, based on community exposure. Additional high-risk areas for water and other values are being identified. Some of the highest risk areas based on community exposure include the Pacific Northwest, the Sierra Nevada Range in California, the front range in Colorado, and the Southwest.

The strategy calls for the Forest Service to treat up to an additional 20 million acres on national forests and grasslands and support treatment of up to an additional 30 million acres of other federal, state, Tribal, private and family lands. Fuels and forest health treatments, including the use of prescribed fire and thinning to reduce hazardous fuels, will be complemented by investments in fire-adapted communities and work to address post-fire risks, recovery and reforestation.

The Bipartisan Infrastructure Law provides nearly \$3 billion to reduce hazardous fuels and restore America’s forests and grasslands, along with investments in fire-adapted communities and post fire reforestation. Funds will be used to begin implementing this

critical work. In 2020, 2017, and 2015, more than 10 million acres burned nationwide, an area more than six times the size of Delaware. In the past 20 years, many states have had record catastrophic wildfires, harmed people, communities and natural resources and causing billions of dollars in damage. In 2020, Coloradans saw all three of their largest fires on record. The running 5-year average number of structures destroyed by wildfires each year rose from 2,873 in 2014 to 12,255 in 2020 – a fourfold increase in just six years. “The negative impacts of today’s largest wildfires far outpace the scale of efforts to protect homes, communities and natural resources,” said Vilsack. “Our experts expect the trend will only worsen with the effects of a changing climate, so working together toward common goals across boundaries and jurisdictions is essential to the future of these landscapes and the people who live there.”

“We already have the tools, the knowledge and the partnerships in place to begin this work in many of our national forests and grasslands, and now we have funding that will allow us to build on the research and the lessons learned to address this wildfire crisis facing many of our communities,” said Moore. “We want to thank Congress, the President and the American people for entrusting us to do this important work.” The Forest Service remains committed to sustaining the health, diversity and productivity of all of America’s forests. Visit the Forest Service website to read [the full strategy document](#). If you would like to partner with the Forest Service, visit the National Partnership Office website at www.fs.usda.gov/working-with-us/partnerships.

USDA touches the lives of all Americans each day in so many positive ways. In the Biden-Harris Administration, USDA is transforming America’s food system with a greater focus on more resilient local and regional food production, fairer markets for all producers, ensuring access to healthy and nutritious food in all communities, building new markets and streams of income for farmers and producers using climate smart food and forestry practices, making historic investments in infrastructure and clean energy capabilities in rural America, and committing to equity across the Department by removing systemic barriers and building a workforce more representative of America. To learn more, visit www.usda.gov. Also, see page 6 of this document.

Appendix A.7. The Use of “Managed Fire” [Dialogue]

Note: This is an e-mail dialogue by some national leaders regarding the concept of “managed fire.” This was previously sent to the Chief of the Forest Service from the National Wildfire Institute in a letter dated July 23, 2021. The “dialogue” is incredibly informative, instructional and so critical to the “A Call to Action.” And, the current stance regarding the use of “managed fires”. The “dialogue” suggests that not much has changed over the past decade or more. Unfortunately, this is probably true. Thus, the need to aggressively deploy a “A Call to Action.”

1. Has “Managed Fire” been used in the past?

Ray Haupt, haupt@sisqtel.net, 5/22/2021

Prior to 2010, the year I retired managed fires **were only allowed in Wilderness** (emphasis added), the ignition must be from lightning and had to be recorded under a G Code. OMB reprogrammed Suppression dollars, P-Code for this purpose at the beginning of the fiscal year. Resource benefits recorded in FACTS database was prohibited. In these days the process was highly regulated. It required a LMP that allowed it, an approved Fire Management Plan outlining the parameters, a documentation process that looked at short/long term fire behavior, a checklist of signatures documenting ignition and compliance with all the above, a trained DR with fire quals including Wilderness policy and advanced fire behavior and the courses leading to this level, an equally trained District Fire Management Officer who is also a current ICT 3 who trained with the DR at Marana in Advanced Fire Applications and the same training and qualifications for the Forest FMO. I know this well as I was the only line officer in R5 to qualify in those years and wrote R5's handbook Fire/Wilderness policy implementation in 2007. The whole thing was turned on its head shortly after 2010. I believe due to limited line requisite qualifications as the agency got dummed down.

2. Managed Fire in 2012 expressed concerns over use of managed fire:

Email from Bill Derr[billlecfm@me.com] June 3, 2012 to Jim Hubbard.

Hi Jim:

It seems that the field has failed to heed the policy direction that you so well-articulated to retirees on numerous occasions in the past two years that: "All wildfires on or threatening NFS lands, regardless of cause or location, would receive full suppression during fire season". The R-3 fire now at 190,262 acres, which was caused by lightning on May 9th and allowed to burn by the Forest Service, is one of many recent examples of cases where the direction you so well expressed in not being followed by the field.

Can you enlighten me on any changes since we last spoke which may have altered the policy direction you indicated to retirees that you intended to convey to all field personnel?

What efforts are planned to assess definitively the forest ecosystem benefits referred to in the Gila National Forest News Release of May 17th (following email) on the Whitewater/Baldy Complex?

There is a growing concern among retirees about the unintended consequences and damage to valuable natural resources and private property resulting from the escape of let burn fires managed by the Forest Service to achieve ecosystem benefits.

There is the potential for civil and even criminal liability exposure to the Forest Service and its officials when decisions allow wildfires that could have been easily suppressed in their incipient stages to escape causing unacceptable natural resource damage and damage to private property and threaten and/or take the lives of persons.

It would be unfortunate if retirees, who are wildland fire experts, were asked to investigate the aforementioned incidents and subsequently testify as expert witnesses for plaintiffs who had brought legal action against the Forest Service for recovery of damages alleged to have been the result of negligent acts by Forest Service officials. We would not welcome this role, but, in good conscience, we would have no choice.

I strongly recommend that the Forest Service:

1. "Stand Down" from the current practice of allowing selected fires to burn to accomplish management objectives.
2. Adhere to the policy direction you have previously stated to "immediately suppress all wildfires regardless of cause or location during fire season".
3. Appoint an independent group of wildland fire suppression experts to conduct an objective and comprehensive review of the Whitewater/Baldy Complex Fire and other recent fires where the Forest Service has allowed them to burn in lieu of immediate full suppression. The review should address:
 - a. The soundness of Forest Service policy to not take immediate full suppression actions on the subject fires and an assessment of damages to natural resources and property resulting therefrom.
 - b. The decision process and identification of Forest Service officials involved in making the subject decisions including their wildland fire suppression qualifications, and,
 - c. A reassessment of Risk Management criteria which appears to be impeding responsible initial attack fire suppression actions, thereby, increasing overall risks to firefighters by placing more firefighters on more acres over longer periods of time.
 - d. Charter a study group of wildland fire experts (including retirees) to assess current and past wildland fire control and management practices and make specific recommendations to ensure that the National Forest System's valuable natural resources are: "Properly protected, consistent with the Organic and Multiple Use Acts, to ensure that the American

people continue to benefit from the valuable goods and services that the National Forests provide in perpetuity".

- e. The Forest Service and its leaders have the opportunity to exercise bold leadership at this time by addressing this issue in an objective and forthright manner. Failure to do so will, in my opinion, not bode well for the Forest Service in the long run.

In closing, I must inform you that in my opinion, it is only a matter of time before States, County's, and private parties damaged by Forest Service decisions to allow some fires to burn by not taking immediate full suppression action will bring legal action against the Forest Service requesting a Restraining Order to halt the Forest Service policy and practice of allowing some fires to burn in lieu of full and immediate suppression. Further, the concerns expressed herein, absent a definitive response from the Forest Service, will be shared with the Press, Congress, State politicians, and other parties of interest by like-minded individuals who have grave concerns regarding the protection and management of the National Forests today.

I look forward to your response. Retirees would be happy to discuss further our concerns.

Best Regards, Bill

Response from Jim Hubbard

From: "Hubbard, James E -FS" <jehubbard@fs.fed.us>

Subject: Re: Whitewater/Baldy Complex

Date: June 3, 2012 at 8:02:45 AM PDT

To: "billlecfm@me.com" <billlecfm@me.com>

I've been out all week Bill, but read your email and sent on to Tom Harbour. We have been to the RLTs [Regional Leadership Team Meetings] this spring emphasizing aggressive IA [Initial Attack] and elevating multiple objective strategy decisions to the RFs [Regional Foresters]. More work to do and I'll take a closer look next week.

3. Managed Fire in 2016 expressed concerns over use of managed fire:

Email from Bill Derr [billlecfm@me.com] 4/12/2016 to Jim Hubbard:

Hi Jim: The forthrightness and candor in your discussions with retirees on F&AM [Fire and Aviation Management] and related issues is much appreciated. In that regard, I believe we have an obligation to respond in kind on the issue of using fire suppression funds to perform work on wildfires wherein the USFS is allowing them to burn to reduce fuel loads and benefit the resource.

Whatever term and/or how it is defined to describe this activity and how it may be referenced in Forest Plans may not be sufficient to provide authority to spend said funds without violating Federal laws governing the use of appropriated funds. It appears, based on the Chief's April 5,

2016 Letter of Intent, "expand the use of fire", that the USFS may be planning to increase "the use of fire" as a method of reducing fuel loads and to provide other beneficial outcomes associated with forest management. The risks (escapes and exposure to criminal and civil liability) and environmental restrictions associated with prescribed fire have curtailed this activity sufficiently to cause the USFS to explore other methods of accomplishing prescribed fire objectives.

I am concerned that those persons or groups who may object to any aspect of the Chief's intent to, "expand the use of fire", may elect to voice their concerns to Congress, OMB, OIG, OSC, and the Press. Besides a general objection, I would expect that they would allege that the USFS was guilty of misappropriation of funds.

As to a general objection, that could cover many aspects of, "expanding the use of fire", such as:

1. Smoke pollution and associated health and economic impacts.
2. Unacceptable resource damage, including damage to wildlife and their habitat.
3. Unnecessary risk to firefighters, especially when fires escape.
4. Lack of pre-planning and pre-approved burn plans.
5. Decisions to allow wildfires to burn made by persons without the necessary KSA's [Knowledge, Skills and Abilities] to be qualified to do so.
6. Potential for loss of life and damage to private property creating exposure to criminal and civil liability.
7. The depletion of firefighting resources engaged in managing "the use of fire" from availability to respond to emerging wildfires which require immediate containment.

As you know I share many of the above concerns. Establishing direction in the form of guidelines and standards to implement a program for "the use of fire" is very complex and fraught with a host of variables, many of which are unpredictable by nature. Further, the consistency of application is equally variable given the different KSA levels of the decision-makers involved.

The "Window of Opportunity" during fire season when the full criteria of guidelines and standards were met would be slim indeed, notwithstanding the issue of appropriation integrity. Further, engaging in "expanding the use of fire" would put the USFS on a dangerously slippery slope.

To some degree, masking the "the use of fire" in terminology and Forest Plans could look like a shell game and would compound sanctions leveled at the USFS and/or it's officials should appropriation integrity become an issue.

The greatest danger to the USFS would be a public accusation of misappropriation of funds which could tarnish the USFS reputation and severely inhibit Congress's inclination to properly fund the USFS in subsequent years.

Just a few thoughts to follow-up on the related question I raised in our meeting today. No doubt, the USFS has considered much of the above, however, perhaps a careful second look could be a

wise investment.

Best Regards, Bill

Response from Jim Hubbard

From: "Hubbard, James E -FS" <jehubbard@fs.fed.us>

Subject: Re: NAFSR Fire Committee Meeting 4/12/16

Date: April 13, 2016 at 4:47:31 AM PDT

To: William Derr <billlecfd@gmail.com>

All good points Bill. Thank you for the thinking.

4. Managed Fire in 2021 expressed concerns over use:

Email from Frank Carroll] fcarrolls1@msn.com 7/13/2021 on OP-ED by Gabbert.

Responding to commenters on Wildfire Today’s Bill Gabbert’s Op-Ed on putting fires out quick. July 13, 2021.

The issue for me is that large fire teams are using offensive backfiring to extremes in the name of “risk management.” The history of large fires around Globe, AZ in Gila and other counties is a case in point. If we start late in the chain of large managed fires with the 2017 Pinal Fire, the FS was completely clear that the objective for the fire was to allow the area to burn to “reintroduce fire to fire-depleted ecosystems.” The 4000-acre fire burned for three weeks and did significant damage to riparian areas and woodland communities. In April 2018 Forest officers met with the Gila County Cattle Growers Association to inform them (not ask their opinion) that the FS intended to “burn every acre of public land” in the county over the next several years as opportunities arose. The Woodbury fire in 2019 was an extension of that declared intent. But the Bush fire in 2020 along with Salt and Griffin and others really showed FS intent. Those fires were nursed and lit on purpose to cover hundreds of square miles to meet some aspirational objective of land and resource management. The practice of aggressive and offensive burning continued unabated to the present day, most recently when the FS used two fires started by military aircraft, the Telegraph, and Mescal, to burn off East Mountain and Six-Shooter Canyon among other pristine places in a massive burn that should have been put out southwest of Miami. It’s not just managed fires being allowed to drift around and burn where they will; it’s also backfiring big fires to make them bigger on purpose.

Thanks, Bart. Yes, we do. We have the annual Chief’s letter describing “restoration wildfire” objectives for each year. We have the FSM and handbooks. We have the detailed National Fire Plan. We have regional and local unit documents and correspondence that detail how the policies

will be implemented. We have done and are doing extensive analyses of every iteration of every WFDSS, every Letter of Intent, every Delegation of Authority, and documents, letters, and observations of affected people, and communications between and among people actively engaged on these fires. We have one blow-by-blow account by a senior air attack supervisor over the fires who gave us aircraft use and impact reports detailing how air tankers were used for point protection and herding fires away from communities but pulled and grounded when the fires began to die or interfere with backfiring plans. We have interviewed leading ops people and line officers, often on a daily basis, across the spectrum (who you know very well and began fire careers in the early 70s just as I did in Arizona). We have meeting notes and handouts from permittees, local government officials, and elected reps. We have the direct observations of wildlife conservation groups and their officers, state officials, and others with intimate knowledge of the difference between declared intent and outcomes. We have forest plan standards and guidelines, records of what plans call for versus what is actually happening, and the legal and regulatory framework against which the current fire policy must be judged. We have prepared an extensive document detailing the conduct of these fires, including the recent cynical renaming of “managed fires” to “defensive fires” which differ from each other in no material way. We will present this information to almost 50 interested and affected groups and organizations in Phoenix on July 27 preparatory for a major lawsuit designed to enjoin the FS from continuing the “managed fire” program absent required legal planning and records of decision. To understand that part, remember that the fire-retardant program had to pass the NEPA, NFMA test for the same reasons “managed Fire” does; They are premeditated and preplanned major federal actions, and the cumulative effects must be disclosed in advance. We are joined in the suit by forest users across the spectrum of organizations and elected officials. You are correct that the FS does not want to intentionally burn the Sonoran Desert, and yet their backfiring on the Bush Fire alone destroyed tens of thousands of saguaros and thousands of protected Arizona cypress trees, not to mention thousands of acres of critical habitat for flycatchers and other wildlife. When you fall back to the next best lakeshore or state highway, you’re not able to cleave to your stated intent to protect things that need protecting. Our intent is to help the FS and the fire program managers get back in line with law, regulation, and policy as quickly as they can. By “our” I mean a dedicated group of former ICs, line officers to the Chief’s level, deputy chiefs, associate chiefs, fire program managers, district rangers, forest supervisors, wildlife conservation groups, grazing associations, the list goes on. Stay tuned.

5. “Monitoring Fires” another term for Managed Fires?

Dave Nelson, dknelson@comcast.net, 08/01/2020

I am not judging the validity of the monitoring of the 17 monitored fires as I do not know their location or the specific conditions. I do agree with Mike and Stub about the analysis that “managing wildfire for resource benefits” has its place. However, some questions, observations of past practices, planning, lack of specific established satisfactory results, cost analysis of the program (total, not just fire by fire, etc. are:

1. First, how are 17 fires being allowed to burn with no suppression action considering the Chief’s “put the fire out” at least for the 2020 fire season?
2. And as to some of Bill’s concerns:
 - a. How does this meet current appropriation limits on EFF (may be called something else now)? Has new legislation or appropriation guidelines been approved by Congress?
 - b. What about environmental analysis other than a blanket approach in the Forest Plan? Or how is the analysis done in the Plan? By large contiguous units or smaller sub-units such as were established in the 1980-90 planning process?
 - c. What criteria have been established to determine whether or not to allow the burning to continue such as time of year, preparedness level, fire danger rating, other fire activity, resource availability, public vulnerability, etc.?
 - d. What criteria are used to determine when and how the fire is allowed to continue or suppression to begin? I have witnessed several fires that were less than an acre, in the rocks, and determined to not be going anywhere that didn’t follow the script and burned out of the wilderness or Park and destroyed private property.
 - e. What analysis goes into the risk of requiring suppression resources when they are needed for new starts and fires that do threaten the WUI or other areas requiring the fire to be suppressed?
 - f. What is the level and completeness of any “After Action Analysis (AAA)” is done on “managed wildfires” or any fire escaping IA and extended attack?
 - g. Does the AAA analyze the costs vs. benefits, the impact of suppression resource diversion, the impact on the public, etc.?
 - h. Does the AAA adequately analyze the end vs. anticipated results?
 - i. Is there a requirement to develop an annual report for the “managed fire” program documenting the overall results of the program?
 - j. Are or will these AAA’s include any non-Agency evaluators?
 - k. Are these AAA’s and annual reports readily available to the public?
3. And what about limiting the size of a managed wildfire so that when it does get into the wrong area and/or increases the intensity and spread you actually have the necessary suppression resources to do something about it?

4. And why, if using wildfire for managing resource benefits is such a good deal do you have to wait for a lightning bolt to start it? Wouldn't it make more sense to just go out there and manage it like an Rx burn depending on the randomness of lightning?

This is not intended to be a comprehensive list and I am sure it can be easily expanded. It is just a number of items that come to mind easily that I think should be a part of a “managed wildfire” program. As well as for an Rx Burn program. Why should they be any different? As always the old adage of “playing with fire” does not usually reference the good that can occur.

David K. Nelson [RIP]

6. “Let fire play it’s natural role on the landscape” terminology means let it burn in managed fire concepts:

Ted Stubblefield, highdesertstub@gmail.com, 06/13/2021

Subject: Re: | Gila NF: Johnson Fire Update for June 13, 2021 NM Fire Info. Ah ha, a new term for "managed fire:" *let fire play it's natural role on the landscape*. They just forgot to mention the additional millions of dollars their playing around will cost the public.

Costs really don't seem to matter anymore; spend it like you got it is their new motto.

I mean this very seriously. The ones directing this kind of "management of fires" (and I include ICs) have forgotten WHO THEY WORK FOR, and it sure as hell isn't the agency!

Dave Nelson, dknelson@comcast.net, 06/15/2021 response to Ted Stubblefield note above.

Stub – not that it changes anything, but they have referred to these “let burn (my term)” fires as *“let fire play it's natural role on the landscape”* from the beginning back in the early 1970s as I remember.

This fire was started by lightning at noon on May 20. Wonder what the Initial Attack amounted to? My guess is that they evaluated and decided to “let it burn” with a contain/confine strategy. By 5/21 it was 250 acres w/ 1 Hotshot Crew, 1 Ten-person hand crew (HC). 1 T3 Engine, 1 T1 Helicopter, and a 10 Person Fire Use Module on order.

By 5/24 it was 6,093 acres with 1 Hotshot crew, 1 ten-person crew, a 10-person Fire Use Module, and 1 T3 Helicopter.

A week later on 6/1 it was 34,944 acres with 2 Hotshot crews, 1 Ten person HC, 3 Ten-person Fire Use Modules, 3 T3 engines, 2 T6 engines, 1 WT, and 2 T3 Helicopters.

On 6/14 it was 65,289 acres with 11% of the perimeter lined and 3 Hotshot crews, a 12 person HC, 1 10-person Fire Use Module, a 20 person HC, a 20 person IA Crew, 5 T6 engines, 4 water tenders, 2 T3 Helicopters, and a T2 Helicopter.

They say their strategy is confine/control, but sounds to me more like “let burn/managed fire” to me. The confine/control strategy is more a strategy dictated by the fire as opposed to just letting the fire take its course. However, if a fire is to be “managed to benefit resources” what they are doing here is how I would suggest doing it. But it again raises the questions of in declared fire season, having an EA or EIS, setting limits, using FF dollars, setting objectives and evaluating how well they are met, etc.

Didn’t know there were so many different hand crews – hotshots, 10-, 12 - and 20-person hand crews, fire use modules, 20 person IA Crew. Looks to me like maybe the ICS terminology has slipped somewhat.

Nice gig when you can spend over 3 million which wouldn’t be budgeted in a millennium.

7. **Current fires of concern:**

Ron Raley, ronraleym@comcast.net 07/18/2021

- **Lava Fire** - The initial attack resources left the fire after the first operational period violating a long-standing principle “Never leave a fire until 24 hours after the last observable smoke” On the second day it ran and threatened the communities of Lake Shastina, Weed and Mt Shasta. People are very upset because it was until day three that they began a robust fire suppression effort.
- **Beckworth Complex** – Once again, as has been reported, the original Sugar fire was contained then allowed to escape days later due to neglect. The community of Doyle suffered a large number of homes and businesses lost
- **Tamarack Fire** - The Tamarack fire was ignited by a lightning fire on July 4th. It was being “monitored” until July 16th when it blew up and threatened the community of Markleeville and others.

Appendix A.8. The Impacts of Wildfire on Water Yield and Quality¹⁷¹

Post-fire watershed impacts

Decisions to “let it burn” must be tempered with an understanding of the adverse consequences of large wildfires on the direct impacts to water resources, downstream consequences and related loss of fish and wildlife values. In the late 1970’s Forest Service research hydrologists developed a comprehensive cumulative watershed impact analysis procedure, published in 1980 by the EPA called WRENNS (An Approach to Water Resources Evaluation of Non-Point Silvicultural Sources), 1980 (EPA -600/80/012), of which I authored the chapter on Sediment. A major update to this watershed-based assessment was called WARSSS, Rosgen, 2006 (Watershed Assessment of River Stability and Sediment Supply), approved by the EPA for national application for clean sediment TMDL’s. Regardless, both procedures quantify the impacts to water resources due to vegetative changes, roads and surface disturbance activities including wildfires. The quantitative assessments include water yield and peak flow increases, surface and mass wasting erosion processes and channel source sediment due to streambank erosion, channel enlargement, floodplain/alluvial fan abandonment and increased sediment supply that were directly related to *increased peak flows*.

Following two major wildfires in Colorado, the WARSSS assessment was recently conducted in detail on the Pike-San Isabell N.F.’s in Colorado to determine the extent of water resource impacts to prescribe restoration scenarios and set prioritization for application. I used the WARSSS watershed assessment methodology to quantify and validate the post-fire watershed impacts on both the large Hayman fire, and the more recent Waldo Canyon Fire, both near Colorado Springs, Co. *Three orders of magnitude of sediment yield/year* by thousands of tons were still being delivered downstream as well as extreme stream channel instability, loss of river function and fish habitat degradation on the Hayman fire *that had been recovering for over 12 years*. Both fires resulted in similar processes directly responsible for the sediment and downstream impacts which was *not surface erosion* (less than 15percent of the problem) but was related to *increased peak flows* and *channel source sediment* from *streambank erosion and channel incision*.

Although there was good ground cover density by grasses and forbs within the Hayman fire, the accelerated sediment yield was primarily due to increased peak flows with only moderate precipitation events that were routed through unstable stream channels. Our restoration approach as implemented, was to reconnect incised and eroding channels to alluvial fan surfaces and reconnect floodplains to better distribute the frequent, unusually high peak flows. The change in normal water losses from crown interception and evapotranspiration resulted in increased peak flows from wildfires in these watersheds that would take approximately 75-90 years to regain a forested stand to establish pre-fire hydrologic conditions. The long period of recovery is related to a slow growing season at higher elevations in Colorado and other areas within the Rocky Mountain west. The eastern US would have a much faster forested stand recovery potential, but lower wildfire incidence.

Unfortunately, there is a common misconception within the Forest Service that post-fire recovery occurs within 2-3 years, related to ground surface reestablishment of grasses and forbs. We have

found this to be incorrect as the focus has been on surface erosion (rill and gully) processes that makes up a small percentage of the sediment and downstream impacts. Thus, most BAER teams that prescribe aerial mulching are treating a very small percentage of the post-fire water resource impacts.

Stream restoration on a watershed scale is an expensive proposition, thus *prevention* of such large-scale wildfires with an aggressive initial attack approach was the direction in my 20 years field experience with the Forest Service...keep them small...at all costs! The unfortunate build-up of fuel with effective fire control should be managed by good silvicultural and forest health practices as well as salvage and fuel hazard reduction timber sales. As I remember with the creation of the Forest Reserves in the late 1800's, the main purpose was to provide a timber source and to “secure favorable conditions of water flows” These long-term post-wildfire water resource impacts have *created anything but favorable flow conditions!*

We have the tools to accurately predict these adverse water resource impacts, but don't have the funding or management direction to correctly restore the extensive and long-term adverse effects. It is not a short-term issue! We do however, have the opportunity to redirect fire prevention and forest management efforts which will be the most effective to revisit this major goal in the creation of the forest reserves. To continue the management direction of “let it burn” must be directed by someone totally unfamiliar with understanding the cause and consequence or post-fire water resource impacts, including the extensive loss of fish habitat and riparian function.

Appendix A.9. Proposed Legislation Halting “Managed Fire”

Rep. McClintock and Rep. LaMalfa Introduce Legislation Requiring the USDA Forest Service to Immediately Suppress Wildfires

WASHINGTON, D.C. – On March 3, 2022, Congressman Tom McClintock (CA-04) and Congressman Doug LaMalfa (CA-01) introduced legislation directing the USDA Forest Service to immediately suppress wildfires on National Forest System lands and put an end to the policy of letting fires burn.

“This ‘let burn’ policy of federal land managers began in 1972, during the height of the radical environmental movement,” **McClintock said**. “Essentially, it holds that ‘fire is our friend.’ It stems from the premise that fire is nature’s way of cleaning up forests, and that active suppression of fires leads to a build-up of excess fuels. As we have tragically witnessed firsthand, it is dangerous nonsense to ‘monitor’ incipient fires in today’s forest tinderbox. The USDA Forest Service was formed to remove excess growth before it can burn and to preserve our forests in a healthy condition from generation to generation. It’s time they did.”

“The days of ‘monitoring’ fires must end – Northern California is burning up at a record rate. The Forest Service’s monitoring policy and ‘watch and wait’ has allowed multiple catastrophic fires to unnecessarily escalate and devastate our wildlands and rural towns,” **LaMalfa said**. “In 24 hours, what starts out as a small blaze can expand to consume thousands of homes, municipal facilities, and businesses. Drought stricken; unmanaged, overgrown forests are a ticking timebomb for another massive fire. In addition to aggressive initial attacks on fires, we must properly manage our forests by thinning near towns and infrastructure, clear a wider buffer zone around power lines, as well as use roads as firebreaks. Our forests are overgrown, the long-term solution is to return to proper management and aggressively thin them. Why is America the number 2 importer of wood while our own forests burn to the ground - causing untold damage to families, pollution that chokes half the country, and destroying the environment?”

Congressman McClintock and Congressman LaMalfa sent a [letter](#) to Chief of the USDA Forest Service Randy Moore urging him to implement these policies for the upcoming wildfire season.¹⁷²

[H.R. 6903](#) [click on *text*] requires that “to the extent practicable, use all available resources to carry out wildfire suppression with the purpose of extinguishing wildfires detected on National Forest System lands not later than 24 hours after such a wildfire is detected.”

Appendix A.9.1 H.R. 6903 Text [Updated January 24, 2023]

.....
(Original Signature of Member)

118TH CONGRESS

1ST SESSION

H. R. _____

To require the Secretary of Agriculture to carry out activities to suppress wildfires, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

Mr. MCCLINTOCK introduced the following bill; which was referred to the
Committee on _____

A BILL

To require the Secretary of Agriculture to carry out activities
to suppress wildfires, and for other purposes.

*Be it enacted by the Senate and House of Representatives of the United States of America in
Congress assembled,*

SECTION 1. SUPPRESSION OF WILDFIRES.

(a) IN GENERAL.—With respect to covered National Forest System lands, the Secretary of Agriculture, acting through the Chief of the Forest Service—

(1) shall—

(A) use all available resources to carry out wildfire suppression with the purpose of extinguishing wildfires detected on such lands not later than 24 hours after such a wildfire is detected; and

(B) immediately suppress any prescribed fire that exceeds prescription;

(2) shall not inhibit the suppression efforts of State or local firefighting agencies that are authorized to respond to wildfire on such lands;

- (3) may only use fire as a resource management tool if the fire is a prescribed fire that complies with applicable law and regulations;
 - (4) may only initiate a backfire or burnout during a wildfire—
 - (A) by order of the responsible incident commander; or
 - (B) in instances that are necessary to protect the health and safety of firefighting personnel; and
 - (5) shall use all available resources to control any such initiated backfire or burnout until extinguished.
 - (b) COVERED NATIONAL FOREST SYSTEM LANDS DEFINED.—In this section, the term “covered National Forest System lands” means any area__
 - (1) located within National Forest System lands; and
 - (2) that—
 - (A) the U.S. Drought Monitor has rated as having a D2 (severe drought) intensity, D3 (extreme drought) intensity, or D4 (exceptional drought) intensity;
 - (B) the National Interagency Fire Center declares has a National Wildland Fire Preparedness level of 5; or
 - (C) the Forest Service has identified as being located in a fire shed ranked in the top 10 percent of wildfire exposure (as determined using the most recently published models of fire shed risk exposure published by the Forest Service).
-

Note: H.R. 934:

I am also asking people to reach out to your Congressional contacts and others and support the passage of H.R. 934:

<https://www.congress.gov/bill/118th-congress/house-bill/934/text>

Appendix A.9.2. Additional Proposed Legislation to Address Fire Suppression [Senator Alex Padilla (D-CA)]¹⁷³

Fire Suppression Improvement Act.

In light of year after year of increasingly catastrophic wildfires in the West, it has become clear that the federal government must do more to support state and local firefighters with their initial attack in order to get fires under control quickly and stave off increased spread and destruction.

The existing Fire Management Assistance Grant (FMAG) Program is available to state, local, and tribal governments for the mitigation, management, and control of fires on publicly or privately-owned forests or grasslands that threaten such destruction as to constitute a major disaster. However, this program currently does not reimburse the pre-deployment of assets to prevent fires from growing out of control, and it does not currently allow for any flexibility in the federal cost share the way other FEMA disaster grant programs do.

What the Fire Suppression Improvement Act would do:

- **Pre-deployment of Local Assets:** This bill would explicitly allow for state or local governments to use FMAGs for the pre-deployment of assets and resources. These pre-deployed assets are critical to suppression of fires and are sometimes the only way to contain a fire before it gets out of hand and needs a major disaster declaration. Currently, FMAGs can only be used to reimburse expenses incurred after is it granted. This bill would simply allow for FMAGs to help state and local governments cover the cost of fighting incidents from the beginning of the high-risk event.
- **Fire Management Assistance Cost Share and Eligible Activities:** This bill would make FMAGs consistent with other FEMA disaster assistance by stating that the federal cost share of FMAGs shall be not less than 75 percent of the eligible cost of such assistance. This bill does not mandate any increase but simply allows for flexibility and increased federal assistance where necessary. As states and locals attempt to fight and contain more frequent and more dangerous fires, it is imperative that the federal government has the flexibility to meet the current crisis conditions on the ground.

Appendix A.10. H.R.5631 - Tim Hart Wildland Firefighter Classification and Pay Parity Act

A critical need to help address America’s unplanned wildfire National Emergency is adequate pay and housing for firefighters. Ximena Bustillo, a food and agriculture policy reporter at POLITICO developed an excellent article of this issue dated March 15, 2022. Appendix A.10 highlights this issue and proposed legislation as a potential solution. As stated by Bustillo:¹⁷⁴

The United States Forest Service has had chronic staffing shortages for over a decade. But amid rising wages and a fierce competition for labor across the U.S. economy, the agency faces a particularly bleak hiring picture.

Workplace conditions like low and non-competitive wages and housing availability and affordability have long been issues for the Forest Service recruitment. The Forest Service administers 3,320 housing units for USDA and other emergency personnel nationwide. But many Forest Service employees say these units are not maintained, and some are unlivable.

The bipartisan infrastructure bill that Congress passed in the fall contains \$600 million to help [USDA and the Interior Department increase wages](#) and convert seasonal employees to full time. USDA said it has already transitioned 1,000 employees. The infrastructure law also directed the Office of Personnel Management to reclassify the agency’s employees so they are eligible for higher pay.

Congress is weighing a standalone Forest Service bill, called [Tim’s Act](#) after wildland firefighter Tim Hart, who died while fighting a fire in 2021, which would increase firefighter minimum pay to \$20 an hour and provide a housing allowance and other benefits. Proponents of the bill hope parts of the legislation will be included in the 2023 omnibus spending or National Defense Authorization legislation.

USDA’s [10-year wildfire mitigation plan](#) acknowledges the staffing needs, stating that “next steps will include building our workforce capacity in the Forest Service and with partners to accomplish the work at the scale needed and establishing the large multijurisdictional coalition needed to support the work.” It said the agency is working to implement the new firefighter job series classification, increase salary base pay, and convert more than 1,000 seasonal firefighters to permanent positions. The [implementation plan emphasizes](#) cross-government collaboration on training and workforce-sharing. USDA said the OPM, Forest Service and DOI have convened a workgroup that is meeting regularly to work on a new wildland firefighter pay structure mandated by the infrastructure law. The group will hold focus group sessions in March, with the work required to be completed by May 2022.

Appendix A.11. A Creative Movie: Forest Under Stress by Rachel Lee Hall

The “A Call to Action” wants to include a short-animated film developed by one of our colleagues – Rachel Lee Hall.¹⁷⁵ Many of you have seen it. But there has been such an overwhelming response to its content, we wanted to include it in this “A Call to Action” to ensure its highlight and continuance.

Forest Under Stress (FUS) is a short film about Southern Oregon forest health, and Rachel’s observations regarding the forest’s diminishing resiliency caused by the continuous disruption in the hydrological water cycle during the last four decades. This disruption adversely affects root systems, aquifer recharge, and in turn, the terrestrial story, causing brownout and volatile fuel load ignited by man or nature resulting in mega wildfires. Rachel understands that nature will strive to correct this imbalance with wildfire, until the fuel load is exhausted as outlined in [What Happened to Southern Oregon Forests in Spring 2020](#).

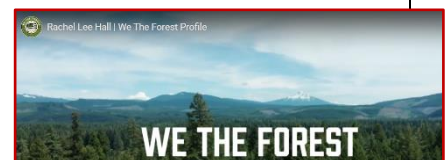
The story takes place in Southern Oregon’s forest plagued by decades of competitive vegetative buildup, which contributes to chronic soil dehydration and follows a trio of mycelium fungi as they struggle to broker an exchange for nutrients, minerals, and moisture to the desperate root system in exchange for carbohydrates. Through the eyes of the mycelia, the film encourages viewers to consider factors that caused stress in the terrestrial story, which helped create the conditions for devastating wildfires. This story asks the audience to remember this clarion call: Remember, the forest is more than just trees.

The movie: Forest Under Stress [FUS]: <https://healthyforests.org/2022/03/short-film-forest-under-stress/>. This movie has already won several awards. Check it out!

My thanks to Rachel for developing this as part of our overall campaign to make a change and strive to ensure America’s forests can again become healthy and indeed remain with us.

Also: Please view the following weblink, “We the Forest” by Rachel Lee Hall. This excellent piece helps illustrate the critical need for expanded forest maintenance.

<https://wetheforest.com/pages/forest-under-stress>



Appendix A.12. Sometimes Things Just Go Wrong

Often in this “A Call to Action” we talk about the benefits of “Prescribed Fire” vs, “Managed Fires or Beneficial Fire.” The conclusion is: Go with “Prescribe Fire” and take “Managed Fire” off the table. But even with the best intentions, thing can go wrong. See the link below I think it is quite relevant:

[USDA Forest Service takes blame for Hermits Peak Fire \(krqe.com\)](http://krqe.com)

The fire started as a prescribed burn in the Santa Fe National Forest near Las Vegas last week and quickly got out of control. It’s something the District Ranger acknowledged and apologized for at the start of a community meeting. “Our prescribed burn from last Wednesday was the cause of the Hermits Peak Fire. With that said, we take full responsibility and with a heavy heart, we are really sorry for what happened,” said Steve Romero, District Ranger, Pecos, of the Las Vegas Ranger District.

Sometimes things go wrong. But clearly, our best bet to use fire to address this National Emergency through more resilient landscapes in forest maintenance, including Prescribed Fire – not “Managed Fire of Beneficial Fire”.

Appendix A.13. Transitioning the *A Call to Action* Into 2024 [through Revision 17.7].

Note: Appendix A.13 is the original text for “Transitioning the *A Call to Action* into the 2023” unplanned wildfire season. The authors wanted to capture the ideas thoughts and sustain these within the expanded document. The text is as follows:

Transitioning the *A Call to Action* into [and through] 2024.¹⁷⁶ The 2023 wildfire season is over and 2024 has begun. As with every year during the past decade, it was destructive – almost 8 million acres burned in 2022; thousands of structures incinerated; entire towns lost; so many lives disrupted; millions of wildlife creatures eliminated; and thousands of people gone due to direct fire and smoke. Damages were in the hundreds of billions of dollars.

Now, Spring 2024 is here. And, unfortunately most will tend to forget the horrific destruction over the past summer and fall of 2022 and 2023. The emphasis to adjust; every year it diminishes. Rhetorically, can most recall the Camp Fire and Paradise, California? What about Greenville?

We simply cannot allow this complacency to continue. Yes, there has been some action and even additional funding secured. But no cohesive approach has emerged. This is what the *A Call to Action* is trying to address: declare a National Emergency and form an effective coalition to address this National Emergency. That is, due to the lack of forest maintenance, wildfires have become larger and more destructive than ever before. This document outlines a way to resolution.

We need your help. Share your voice, please. The wildfire season for 2023 has begun in earnest. Let us not, please, be part of another cycle of destruction-concern-complacency. That is, a horrific fire season destroys property and lives. We then become enraged. Winter sets it and we forget. Help break this cycle whereby “concern and action” prevail for at least the next decade.

Revision 17.7. So, with this Revision 17.7 of the *A Call to Action*, let us continue the story that could easily be changed and strive for resolution in 2024. That is, deploy a “...campaign of our campaign” to begin making America’s forests healthy and more resilient to wildfires so one day in the foreseeable future, fire can again become a conservation tool across a wide-range of landscapes. So, to not be confused, the USDA Secretary recently released a 10-year strategy to address wildfires -- see Appendix A.6. [Wildfire Crisis Strategy Implementation Plan \(usda.gov\)](https://www.usda.gov/land-man/land-stewardship/wildfire/wildfire-crisis-strategy-implementation-plan).

With all due respect, this is not an “Implementation Plan.” It is a “Political Statement.” See page 6. A very credible colleague recently asked me, “what do I think” of this plan? In part, this is what I said: “...I re-read the 10-year strategy over and over . This is such an “empty uniform” and it did not have to be. As you read the document, it is everything and it’s nothing. Pure political rubbish.”

Perhaps Too Harsh. I admit this is probably far too harsh. My apologies for allowing my [Rains] mouth to overload my brains. Still, it is a “plan” without specifics. Thus, there must be a detailed action plan that must be crafted to fill in the gaps. This is fundamental. Candidly, in discussions with senior leaders, I do not get the impression that a true implementation plan is eminent. If true, this would be a misjustice.

With so many contributions, the “A Call to Action” needs to gain more traction to help with this action plan; respectfully, the “A Call to Action” is so superior than what is being advanced by the USDA Secretary. I know I am being very politically incorrect. This – large intense wildfires due to lack of forest maintenance -- is a National Emergency. We should act accordingly. Maybe a visit to Greenville, CA [or Weed, CA, or Maui, Hawaii] might jog our compass a bit.” No more rhetoric. Let’s be specific to address the needs of the American people.

Instead of all the varied opinions during these volatile landscape [s] times, I do not really understand why America’s Chief Forester cannot issue the following order: “...Until further notice from me, the Forest Service goal shall begin to suppress all unplanned wildfires within 24 hours of initial ignition.” This is so basic.

Stray Voltage. Maybe the reason is the concept of “stray voltage.” I heard this recently from a very respected colleague. It means lack of corporate focus resulting in wasted energy. Within the Forest Service, for example, there is not a corporate stance on managed fire; lots of *stray voltage*, if you will. For example, some may conclude, “...aggressive initial attack has resulted in a degradation of the land we have stewardship over, which has created a series of goal conflicts that our field-going personnel must wade through at the point of work.”¹⁷⁷ No doubt there are a series of “goal conflicts” when it comes to this National Emergency we face. *The A Call to Action* strives to end this and seek a corporate position.

After a discussion with a Forest Service senior leader, she agrees with the notion of “stray voltage.” Not to place any blame, the wish of the *A Call to Action* is to band together to advance a corporate and effective program direction.

A Quick Note to Examine. There is a statement in the USDA Secretary Vilsack’s January 18, 2022 Press Release that seems to be quite elegant:

“The negative impacts of today’s largest wildfires far outpace the scale of efforts to protect homes, communities and natural resources,” said Vilsack. “Our experts expect the trend will only worsen with the effects of a changing climate, so working together toward common goals across boundaries and jurisdictions is essential to the future of these landscapes and the people who live there.”

Now, specifically what does this mean? Will the agency, for the foreseeable future, pull out all stops to ensure that all fires are put out immediately? They better. By my calculations, 27 percent of the acres burned in 2021 did not have to burn. I know this estimate is very

conservative. Some suggest as high as 50 percent. Clearly, we could do better. And, it is not just about acres. For example, the notion of “managed fire” creates lots of smoke. Estimates are as many as 14,000 to 50,000 people are dying due to wildfire smoke each year. Does not this require us to be better?

THIS IS KEY.

The USDA 10-Year Strategy. As many have tried to convey in earlier messages, the new “...10-year strategy” by the USDA is not a strategy at all. It is a set of prose – some very good – designed as a political statement that USDA is on top of this National Emergency – destructive wildfires, especially on the west. To be clear, USDA is not [on top of this National Emergency].

First, let’s not strive to make a logical argument that this is a “strategic plan.” It is not, no matter how often you place the words under a microscope in hopes to see better and illuminate a logical stance. Maybe, it could be used as a foundational document to develop a real action plan. However, it is currently laced with such a strong bias that fire is good for landscape scale conservation, heavily influenced by the Research and Development mission area. As a foundational document, this would need to be much more balanced.

It [the so-called “10-year strategy”] is – at best – a policy document that concludes unplanned wildfire can be a good thing. Under the current conditions [lack of forest maintenance over the least 30+ years; drought; development; lack of home hardening and defensible space; inadequate funding from Congress to address preventative issues], unplanned wildfires are NOT a good thing, and this should be a centerpiece stance by the Forest Service. The facts are obvious: excessive destruction, including lives lost – directly from fire and indirectly from smoke.

Yet, it seems clear that corporately, the Forest Service is not willing and/or able to take this stance [unplanned wildfires are not a good thing]. Thus, as some conclude, perhaps the only answer is strong and precise legislative sanction.

2022 was a horrific wildfire year. We shall see what 2023 brings us. We simply cannot understand why the Forest Service does not approach the upcoming wildfire season with a stance that concludes, “...our goal will be to put out all unplanned wildfire ignitions within 24 hours, no exceptions.” And, make this a cornerstone of the Chief’s annual Letter of Intent for Wildfires for the next decade, at least.

The credibility this stance will afford the agency, if corporately deployed, will be immeasurable. We believe the American people expect this. But most of us do not know what we don’t know. So, we look to America’s Chief Forester as the guide: he knows! Thus, it is incumbent on America’s Chief Forester – the USDA Forest Service Chief – to lead the way. And, for unplanned wildfire ignitions, this means:

1. Create a real Action Plan to address our wildfire National Emergency, NOW.
2. The Action Plan must be clear that “managed fire or beneficial fire” will NOT be allowed; “...all unplanned ignitions will be put out within 24 hours, no exceptions.”
3. Continue to work with those who “decide” [i.e., Members of Congress and other state leaders] to secure adequate funding that will effectively implement a cohesive 10-year action plan to address the current wildfire National Emergency.
4. Use the current “A Call to Action” as a guide. Lots of people have worked on it for a very long time. Attached is the current revision and summary [rev. 16.8] for information.

The current “implementation plan” by the USDA, as written, falls short. Thus, let us link the specifics of this *A Call to Action* with the foundational principles of the [Wildfire Crisis Strategy Implementation Plan](#), now. America’s Chief Forester must the lead. This action – combining both -- will make a significant difference.

Advanced Biomass Uses. A key feature of the [Wildfire Crisis Strategy Implementation Plan](#) is entitled *Forest Products*. In the *A Call to Action*, page 25, this is *Advanced Biomass Uses*. These science-based innovations are critical to forest maintenance, thus healthy forests. The greater the level of hazardous fuels that can be economically removed, the more efficient the forest maintenance campaign becomes.

Let us recognize it is just July 2022 and already 37,395 fires have burned **5,499,140** acres – a far greater pace than last year. Help make a change in what has become a National Emergency. Sign on to this petition or share your voice in other ways. Your help is essential.

Impacts on Water Resources. Recently, the *A Call to Action* received some very instructional input. To most effectively highlight this contribution, I wanted to place it within this “Transitioning the *A Call to Action* into 2022” section. The specific input is from Dave Rosgen, former Forest Service employee and legendary hydrologist. In summary, it concludes:

“...As part of the Forest Service (Forest Reserves) creation act, the purpose in part was to *secure favorable conditions of water flow*. With 20-years of experience with the Forest Service and 30+ years since, as a consulting hydrologist/geomorphologist, Colorado fires, for example, have showed 3-4 orders of magnitude increases in post-fire sediment yields, major loss of the aquatic resource, and long-term recovery of evapotranspiration with continued peak flooding -- with only moderate precipitation events.

Allowing the large fires to take place not only promotes loss of property and life, but long-term watershed damage. If the Forest Service wants to meet its founding purposes that prompted historical fire prevention and control to maintain favorable conditions of water flow, then their lack of fire suppression and watershed management has prompted just the opposite! Fire suppression, in my history with the Forest Service, demanded to keep them small!”¹⁷⁸

See [Appendix A.8](#) for a more detailed explanation of the impacts of wildfires on water yield and quality.

Proposed Legislation. On March 3, 2022, Congressman Tom McClintock (CA-04) and Congressman Doug LaMalfa (CA-01) introduced legislation directing the United States Forest Service to immediately suppress wildfires on National Forest System lands and put an end to the policy of letting fires burn. See Appendix A.9. [H.R. 6903](#) requires that “to the extent practicable, use all available resources to carry out wildfire suppression with the purpose of

extinguishing wildfires detected on National Forest System lands not later than 24 hours after such a wildfire is detected.”

2022 Letter of Intent. Further, both Members sent a [letter](#) to the Forest Service Chief urging him to implement specific policies for the upcoming wildfire season.¹⁷⁹

Could This Be a National Emergency Commitment – The First Step in the *A Call to Action*?

The Departments of Agriculture, the Interior and the Federal Emergency Management Agency (FEMA) announced the formation *Wildland Fire Mitigation and Management Commission*. The commission is tasked with forming federal policy recommendations and strategies on ways to better prevent, manage, suppress and recover from wildfires.

The commission will represent federal agencies, state, local, and Tribal governments, as well as the private sector. Together, their recommendations will be submitted as part of required reports to Congress within a year of their first meeting.

[Applications](#) for Commission membership are being accepted now [until March 25, 2022].

Short-Staffed and Poor Facilities for Firefighters. The United States Forest Service has had chronic staffing shortages for over a decade. But amid rising wages and a fierce competition for labor across the U.S. economy, the agency faces a particularly bleak hiring picture. Workplace conditions like low and non-competitive wages and housing availability and affordability have long been issues for the Forest Service recruitment.

The Forest Service administers 3,320 housing units for USDA and other emergency personnel nationwide. But many Forest Service employees say these units are not maintained, and some are unlivable. The bipartisan infrastructure bill that Congress passed in the fall contains \$600 million to help. Further, Congress is weighing a standalone Forest Service bill, called [Tim’s Act](#) after wildland firefighter Tim Hart, who died while fighting a fire in 2021, which would increase firefighter minimum pay to \$20 an hour and provide a housing allowance and other benefits. See Appendix A.10.

“... I told them about you and the group and that I support everything you have shared. If I were the Forest Service Chief, I would take the *A Call to Action* and find a way to “operationalize” and execute it. I’m not naïve enough to think any of it would be easy, but someone needs to step up and demonstrate leadership in this area. The public deserves better....”

A Senior State Leader in Fire Suppression for California [2/11/2022]

Appendix A.14. An Opinion Piece¹⁸⁰

Note: This is an opinion piece sent by a colleague. Further, there is a cautionary note by the Director of the National Wildfire Institute that follows.¹⁸¹

I [Carroll] am very concerned that none of the academic and research community understand the Forest Service deferred fire suppression strategies and how those strategies are burning forests and communities. We estimate FS [Forest Service] firefighters lit 60 percent¹⁸² of the Dixie Fire on purpose. They did indeed let the Tamarack Fire burn and it’s not just politicians who think so. They said so themselves. It happens all the time. The August Complex. The North Complex. Pole Creek and Bald Mountain in Utah. Don’t take my word. Read Dave Whittekiend’s FLA on Pole Creek.

Deferred fire suppression is the single biggest factor in large fire growth today and none of you are looking at it. Second independent factor is big boxing and lighting big fires on purpose to make them bigger in the interest of “safetiness” and natural resource management benefits. It’s not safer for firefighters to light millions of acres on fire on purpose. It’s not healthy for the public to live in months of intentional smoke. It’s not safe to let the Tamarack Fire burn through two states.”

The current large fire problem is only partially climate driven. Drip torches are the single biggest factor. Fire drones. Helitorches. Very pistols. Shoulder fired ignition devices. Do you have the slightest idea how heavily deferred suppression and purposeful ignition are used to manage fire today? I don’t think you have a clue. Please go to a big fire in Arizona soon and go out with the hotshots on several shifts. You’ll be shocked and awed.

Don’t take my word for it. The CBD Center for Biological Diversity is preparing a Notice of Intent to sue the Forest Service for deferred fire suppression. The agency has never disclosed the cumulative effects of their outrageous burner policies. Those fires are now burning down everything CBD has achieved in 50 years. The FS is burning critical habitat, core habitat, riparian areas, hundreds of thousands of saguaro cacti, the biggest contiguous stands of Arizona cypress, buffer areas for owls, you get the point, yes?

Why don’t you guys in Research wake up and look in your own house for solutions to the worsening fire problem. It is National Forest management of big fires that is the independent factor in burning houses and private lands. Doesn’t happen on state fires or county fires.

It doesn’t happen on the Rouge River Siskiyou NF where Forest Supervisor Merv George and his people have held a couple of hundred ignitions to less than 100 total acres in three years.

Why is that, do you think? Please investigate. He doesn’t claim small fires are dangerous. He puts them out. Weird.

Have a great day and I hope you and your agency develop some situational awareness and an honest curiosity about how a handful of forestry techs in high places are burning our forests and our communities to the ground.

Response Note [From Bruce Courtright, National Wildfire Institute]: It’s a really good piece! The things I think he [Carroll] may have missed the following;

1. FS [Forest Service] needs to back up their talk about partnering with States and Counties. That could make a difference!
2. An issue is that the FS is so understaffed at the field level, that it’s a wonder they get anything done.
3. The other issue is that FS Leadership is not leading. The Rogue River–Siskiyou [National Forest] is a perfect example of what could be done if staffing was directed to the most critical issues [confirmed by Carroll and many others].

Appendix A.15. Letter to America’s Chief Forester from the Association of Fire Ecology¹⁸³

Promoting Fire Ecology Research, Education, and Management

PO Box 50412 Eugene, OR 97405 USA 541.852.7903
www.fireecology.org | office@fireecology.net

June 6, 2022

Randy Moore, Chief
US Forest Service
Sidney R. Yates Federal Building
201 14th St SW,
Washington, DC 20227

Dear Chief Moore:

We fully support the USDA Forest Service’s (FS) concerns over the safe and effective application of prescribed fire and your leadership to reverse a century of fire exclusion in the context of a rapidly warming climate. As fire scientists and land managers affiliated with the international Association for Fire Ecology (AFE), we share your concerns about wildland fires and the ecological and human communities they impact and understand the intent of this pause.

Prescribed fires are a critical tool for “Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America’s Forests” that you and Secretary Vilsack launched in January. Thank you for your leadership on this important document. The Bipartisan Infrastructure Law and its explicit investment in prescribed fire, ecosystem health, and safeguarding human communities provides strong support to the American people for living more securely with the inevitable return of fire.

Today, we ask you to consider re-instating prescribed burning in areas on US National Forests that are not in extreme drought during the 90-day pause. For example, Regions 8 and 9 are not currently experiencing drought, have a long history of success stories with prescribed fire, and show strong need for growing season burning. The recent NOAA drought forecast for the US shows that much of the area of Regions 8 and 9 will be amenable to continued burning actions. Moreover, allowing FS scientists to collect data on prescribed burns conducted by non-federal partners during this period would likewise maintain a national leadership stance in the study of prescribed fire. Once the national review is complete and it is deemed safe to do so, we ask that you consider re-instating prescribed burning in the American Southwest and the western US, even if this occurs before the end of the 90-day pause.

Prescribed fire is implemented on ~10 MM ac annually, exceeding the extent of US wildfires in most years. Across many diverse applications and a large suite of practitioners, prescribed burning escapes are exceedingly rare. Our best data suggest that 99.7 to 99.8% of all prescribed

fires stay within their boundaries and achieve the intended prescription; an even larger percentage avoid any damage to homes and other assets. Due to the excellent leadership of your agency and other state, NGO, and federal partners, escapes have declined precipitously in recent decades. Escaped prescribed fires are thus newsworthy. However, the data support their extreme rarity and speak to the advances in training and implementation that the Forest Service and their partners have led.

Our nation’s forests need prescribed fire now more than ever. Prescribed fires are a primary tool to abate wildfire risks, to expand strategic and tactical locations for more effective suppression actions, and to maintain fuels in a state that is easier and safer to manage. Prescribed fires are critical to restoring ecosystem resilience of native plant and animal communities and to other stressors, and to improving the vigor of forests warmed and dried by climate change. Maintaining managers’ abilities to implement prescribed fire is vital to our shared future.

Much like the well-intentioned fire suppression policies of the past, we will never reach a “no escapes” prescribed burning future. We applaud pressing agency scientists and managers to continuously improve knowledge and practice with prescribed fire, fire behavior modeling, fire weather prediction, and continued investment in world-class fire training. The Association for Fire Ecology is committed to partnering with you to build these tools and their scientific underpinning.

Respectfully,

[Co-signed by members of the Association for Fire Ecology]

Appendix A.15.1 Response E-Mail to the Association of Fire Ecology

To: Administrative Director, Association for Fire Ecology

(541) 852-7903, office@fireecology.net

From: Michael T. Rains <mtrains7@verizon.net>

Sent: Monday, June 13, 2022 6:56 AM

Subject: Wildland Fires: Striving to Reach Out to the "Association for Fire Ecology"

My Issue: Your recent letter to America’s Chief Forester [Appendix A.15].

Regarding the thesis of your letter to America’s Chief Forester, congratulations, you have provided so many good points. Please allow me to differ on a key aspect. That is, the predominate need of putting out all fires immediately. So, you know, I am a fan of “fire on the landscape.” I urge you to see: “...193 million Acres, Toward a Healthier and More Resilient US Forest Service [page 129-164], SAF, 2018.” The words that were written with my co-author, the great Tom Harbour, have not changed. But, NOT NOW.

The conditions of the landscapes, especially in the western part pf America, dictate that we depart from an intellectual argument and face reality. That is: “...The goal is to put out every fire immediately. Reduce response time by at least 80 percent! Smoke is a killer; please know this. We must keep it to a minimum. More fully utilize smaller, more agile aircraft and helicopters. They come with much less people needed to effectively operate, thereby reducing the COVID-19 risk profile. Use larger aircraft in a more appropriate role; their response time is slower [see “A Call to Action”, page 8].

For the rest of the 2022 fire season – which I predict will be horrific – the is only one answer. That is, strive to put out all unplanned wildfire ignitions immediately; no exceptions. WE SIMPLY CANNOT EQUIVOCATE ON THIS STANCE – NOT NOW. TOO MUCH DESTRUCTION WILL RESULT AND THE USDA FOREST SERVICE WILL BECOME A PARIHAH IF THEY DO NOT TAKE THIS STANCE – believe me! Clearly, we must band together to never allow this to happen.

So, you know, the National Wildfire Institute [NWI] and its Director Bruce Courtright, have forwarded the NWI’s thoughts on the Chief’s recent letter calling for a “pause” on Prescribed Fire. Simply put, we recommend that the 90 day “pause” on the use of Prescribed Fire should be extended to the end of the 2022 Fire Season. The use of *Managed Fire* is included in this “pause.” The primary reason: the extreme conditions on the western landscapes.

While we acknowledge the eastern part of the country is different, NWI simply believes that any exceptions to the “pause” for this 2022 fire season will be confusing and not appropriate. I will continue to attempt to contact you,. Please feel free to forward all of the attached information [i.e., the “A Call to Action”] to the Association for Fire Ecology as you deem appropriate. Please know that I am copying this email to America’s Chief Forester.

Very respectfully,

Appendix A.15.2. Letter to America’s Chief Forester from the National Wildfire Institute on a Prescribed Fire “Pause”



NATIONAL WILDFIRE INSTITUTE

Supporting Healthy Forests That Resist Catastrophic Fire

To: Forest Service Chief Randy Moore
From: Bruce Courtright, Director, National Wildfire Institute
Date: June 11, 2022

The National Wildfire Institute [NWI] would like to acknowledge your May 20, 2022 decision to pause the use of Prescribed Fire.

We note that your April 14, 2022 *Letter of Intent* allowed for the use of *Managed Fire* with Forest Supervisor approval during Preparedness Levels 1, 2, and 3. And, during Preparedness Levels 4 and 5 with Regional Forester approval.

Since the use of *Managed Fire* has a far greater risk of escapes than Prescribed Fire, the NWI believes the use of *Managed Fire* must be halted, as well. Doing so will reduce risks to people, property, and communities. We also believe the agencies exposure to civil liability will be limited.

A 90-day “pause” will end on August 20, 2022, the middle of what is likely to be the most severe fire season ever. Hence, extending the “pause” to the end of fire season for both Prescribed and *Managed Fire* is essential.

Following is our recommended update to your April 14, 2022 *Letter of Intent*. Thank you for considering our input:

To: Regional Foresters:

This is an update to my May 20, 2022 direction which placed a 90-day pause on the use of Prescribed Fire and the April 14, 2022 Wildland Fire Direction *Letter of Intent*.

“...The 90 day “pause” on the use of Prescribed Fire shall be extended to the end of the 2022 Fire Season. The use of *Managed Fire* is included in this “pause.”

This direction is based on the expected severity of the 2022 fire season and limiting the risks to people, property, and natural resources. I want our goal to put out every fire immediately. Clearly, these are different times. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn anywhere, for whatever reason, for the foreseeable future, is unacceptable and must be stopped now; no exceptions. Our initial attack of wildfires will include immediate dispatch of sufficient air and ground firefighting resources to all wildfires designed to contain them as soon as possible while providing for firefighter and public safety.

Please deploy this update immediately.

Thank you. I am indebted to you for your contributions to the safety of America and the care of our landscapes.

Randy Moore
Chief, USDA Forest Service”

Appendix A.16. Suppress All Unplanned Wildfire Ignitions Immediately.

Note: The following exchanges and weblinks refer to some recent discussions on goal No. 3 of this “A Call to Action.” That is: With the current landscape scale conditions, we must strive to put out all fires immediately.

On June 20, 2022, Michael Archer¹⁸⁴ wrote:

“...Gentlemen, this article will be in today's forthcoming *Wildfire News of the Day*, but I thought I would share it with you ahead of time. It shows a perfect example of how early initial attack limited the size of a wildfire which ignited in the Tahoe National Forest to only 1/10 of an acre. In a prime example of how early initial attack can turn a megafire into a minor incident, the Tahoe National Forest Service reported that firefighters quickly squelched the 1/10-acre Lost Fire two miles south of Forks House, after being spotted by lookouts located on Duncan Peak and Bald Mountain.”

See the following weblink:

<https://fox40.com/news/local-news/lookouts-provide-for-a-quick-response-to-a-fire-in-the-tahoe-national-forest/> [“Lookouts provide for a quick response to a fire in the Tahoe National Forest”].

Two immediate responses to the article were:

1. This is how it's supposed to work!¹⁸⁵
2. I will include this link in the next update of the “A Call to Action.” Nice work by the Tahoe National Forest. Most of the sites included in the link I have been on. By the way, I was able to get a copy of the “A Call to Action” [rev. 13.4] to the White House. But, I must say, it is hard to compete with America's Chief Forester when he concludes, the big problem that we have today is because we put out fires too quickly citing the “10:00 AM Policy” instituted by a former Forest Service in 1935.”¹⁸⁶

See the following weblink [CBS Saturday Morning, 1:57 minutes into the video]:

<https://wildfiretoday.com/2022/06/18/cbs-probes-recruiting-and-retention-problems-in-the-us-forest-service/>

Candidly, the messages on what to do are very mixed and terribly confusing.¹⁸⁷ The “A Call to Action” attempts to provide focus. Clearly, the Forest Service has not been practicing the “10:00 AM Policy” – striving to put out unplanned wildfires within 24 hours after ignition -- for the last century. More recently, the agency has deployed the concept of “Managed Fire.” See page 9. Under the current land conditions, especially in the western part of America, “Managed Fire” has been a disaster – unbelievable destruction of lives, property and wildlife that did not have to happen.

This “A Call to Action” emphasizes the following fundamental points for the foreseeable future – minimally for the next decade – to address the current wildfire situation:

1. Strive to put out all unplanned wildfires within 24 hours after ignition; no exceptions. We must understand that these are different times. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn anywhere, for whatever reason, is unacceptable and must be stopped now.
2. Stop the concept of “Managed Fire” immediately. Using fire as a tool for forest maintenance, Prescribed Fire is *the* standard, which is conducted under very specific conditions.
3. Maintaining America’s forestlands through a wide-range of tactics including timber harvesting, thinning, pruning *and* Prescribed Fire are fundamental to the maintenance of trees, forests and forest ecosystems – the “brass ring” that we seek.

In the CBS Saturday Morning interview¹⁸⁸ [2:30 minutes into the video], America’s Chief Forester calls for “thinning 50 million acres over the next 10 years.” That’s a good start but about 30 million acres short. See page 19.

Getting back to Mr. Archer and the goal to put out all unplanned ignitions as soon as possible. Archer stated that getting alerts on wildfires within less than an hour of ignition is critical. Some *Wildfire News of the Day* subscribers at Ororatech in Germany will be launching satellites over the next few years that can help with early detection, regardless of lookouts or wildfire camera coverage of the area. The CEO at Munich-based OroraTech discussed how satellites they will be launching into space over the next few years will form a constellation that can detect the outbreak of wildfires anywhere on the globe within 30 minutes.

See the following weblink:

https://www.einnews.com/pr_news/577485145/wildfire-monitoring-satellite-ororatech-successfully-proves-technology-in-space [Wildfire Monitoring Satellite: OroraTech Successfully Proves Technology in Space].

Appendix A.17. Letter to USDA Secretary on Forest Maintenance and Protecting America’s Redwoods from Wildfires



NATIONAL WILDFIRE INSTITUTE

Supporting Healthy Forests That Resist Catastrophic Fire

To: USDA Secretary, Thomas J. Vilsack
CC: USDA Undersecretary, Homer L. Wilkes; Randy Moore, Chief, USDA Forest Service
From: Bruce Courtright, Director, National Wildfire Institute
Date: July 17, 2022
Re: Forest Maintenance and Protecting America’s Redwoods from Wildfires

The National Wildfire Institute [NWI] would like to focus your attention on the benefits of active forest maintenance to reduce the impacts of unplanned wildfire ignitions. And, the need to look ahead and ensure that the iconic Redwoods [*Sequoia sempervirens*] are well-protected from wildfires, now and ahead.

On July 7, 2022, the Washburn Fire started in Yosemite National Park in California. To date, about 4,750 acres have burned as the fire moves into the Sierra National Forest. Part of the Yosemite National Park includes the famed Mariposa Grove of Giant Sequoias [*Sequoiadendron giganteum*].

According to John Dickman, a Yosemite Forest Ecologist, “...It [the fire] just died as soon as it hit the grove. We have been preparing for the Washburn Fire for decades [July 12, 2022].” Further, the White House assistant press secretary, Abdullah Hasan, acknowledged Wednesday [July 13, 2022] that efforts to protect the forest from wildfire damage “include removing hazardous fuels,” or thicket and dead trees that are contributing to the fire.

In a recent article in the Los Angeles Times regarding the Washburn Fire, officials concluded that past low-intensity burning in the area -- Prescribed Fire as a part of increased forest maintenance -- is ultimately beneficial to the trees. The result is that the Mariposa Grove survived, remains in good health and a healthier habitat has been created for local flora and fauna,”

Candidly, this is a well-accepted conclusion. That is, sound forest maintenance reduces wildfire intensity. The NWI has authored a report entitled, *America’s Forests in the Balance: A National Emergency* [aka, *A Call to Action*]. *A Call to Action* states, most who are in the profession of caring for the land along a rural to urban gradient, consider themselves *environmentalists*. But,

with a *conservation* bent. That is, to keep our forests healthy, sustainable and more resilient to disturbances. Maintenance is key. Doing nothing means nothing ever changes. Thus, we find ourselves in this current mess. We must embrace the notion of “invest to save.”

Based on the experience of the National Park Service and its Mariposa Grove, we need to look to better protecting America’s Redwoods the same way – through expanded forest maintenance – Prescribed Fire, thinning, etc. We must acknowledge these are different times. With the current land conditions and the impacts of a changing climate, our forests, including the iconic Redwoods, are at stake.

Recently, Fox News published an article entitled, “Environmentalists are blocking forest management methods saving iconic sequoias amid Yosemite wildfire.” To be clear, the NWI strongly disagrees with this piece. It calls for doing nothing. If that direction were followed, the Mariposa Grove would have been lost. As one reviewer stated, the Fox News article “...is insanity.”

For your information, the Web-link to the Fox News article is:

<https://www.foxnews.com/politics/environmentalists-blocking-forest-management-methods-saving-sequoias-yosemite-wildfire>

In summary, the NWI strongly recommends:

1. Continued forest maintenance tactics like those deployed by the National Park Service in Yosemite. Simply put, “invest to save.”
2. Look ahead to ensuring the protection of America’s Redwoods and specific iconic groves.
3. Do not be tricked into intellectual arguments of inaction.

Please let us know how the NWI can be helpful.

Very respectfully,

/s/ Bruce Courtright

Appendix A.18. Saving the Giant Sequoias¹⁸⁹

The Forest Service Announces an Emergency Plan to Save Giant Sequoias

In the past two years, nearly 20 percent of the iconic trees have been destroyed by wildfire.

The USDA Forest Service will fast-track efforts to protect giant sequoias from wildfires, the agency announced on Friday. The move allows the Forest Service to immediately thin the forest in and around giant sequoia groves by removing brush and smaller trees and conducting prescribed burns using the agency’s emergency authority.

Over the past two years, massive conflagrations have killed nearly 20 percent of the ancient trees. “Without urgent action, wildfires could eliminate countless more iconic giant sequoias,” Randy Moore, the Forest Service’s chief, said in a [news release](#).

The Forest Service plans to begin clearing brush and smaller trees from 13,000 acres of national forest to protect 12 giant sequoia groves this summer. Using its emergency authority under the National Environmental Policy Act, the agency can start the work without a full environmental review, which can take over a year to complete.

[Giant sequoias](#), a close relative of redwoods, are the largest tree in the world by volume. They can live for more than 3,000 years and are found only on the western slopes of California’s Sierra Nevada mountains. The trees [are adapted to fire](#) — they have thick, spongy bark that protects them from the flames and the heat actually releases the seeds from their cones, allowing young trees to take root in areas cleared by fires.

But [today’s fires are much different](#) from wildfires of the past. Climate change has led to hotter temperatures, severe drought, a [year-round fire season](#), and the proliferation of bark beetles, which have killed millions of drought-weakened trees and allowed them to pile up on the forest floor.

On top of these changes, for more than a century, the policy has been to put out wildfires as quickly as possible, creating unnaturally dense forests and allowing brush and dead wood to accumulate. These factors have combined to enable out-of-control blazes to explode across California in recent years. The bigger, hotter fires are more likely to reach giant sequoias’ crowns, killing them.

Proper management can help. Earlier this month the [Washburn Fire](#) menaced Yosemite National Park’s Mariposa Grove, but regular prescribed burns to clear hazardous fuels slowed the inferno enough that firefighters were able to protect the giant sequoias. [Ecologists expect all to survive](#). The [Oak Fire](#), which started on Friday afternoon, is currently burning southwest of the park in the foothills of the Sierra Nevada.

Appendix A.19. Reasons To Suppress All Wildfires Within 24 Hours¹⁹⁰

The following are reasons for not using *Managed Wildfire* [see also page 9]. Under the current landscape scale conditions, especially in the western part of the United States, the goal must be to suppress all unplanned wildfires within 24 hours of initial attack -- or each succeeding 24 hours if the first objective is not met:

1. Prescribed Fire [Rx] is far more likely to:
 - a. Meet ecological objectives with reduced risk of escapes and related risks to firefighters and the public, their property, and natural resources.
 - b. Be a controlled low intensity burn, pre-planned and approved and done under ideal conditions for success.
 - c. Not deplete the availability of Initial Attack forces required to respond to new fire starts. Simply put, firefighting resources committed to a *Managed Wildfire* are not available to respond to new wildfire starts, thereby allowing new starts to escape.
 - d. Allow for pre-positioning of control lines and firefighting resources.
 - e. Be lawful and the least costly method of using fire as a forest maintenance tool when properly applied.
2. *Managed Wildfire* is not Rx fire and does not meet the criteria set forth in item No. 1, above. The track record of *Managed Wildfire*, especially within the current landscape scale conditions, is replete with major escapes and unacceptable high intensity burned acreage; excessive resource and property damage; undue risks to firefighters and the public, and wasted costs. The adverse health impacts to the public and firefighters due to excessive smoke are unacceptable. Further, *Managed Wildfire* has not gone through the NEPA [National Environmental Policy Act] process nor is it likely to legitimately meet the requirements.
3. Use of allocated fire suppression funding for *Managed Wildfire* appears to be a violation of Appropriation Law.
4. Disguising *Managed Wildfire* as a “Big Box” or other strategies, such as “less than full suppression” is misleading. The cavalier use of “firing operations” unnecessarily consumes excessive acres.
5. Purposely igniting the woods for other than a traditional *backfire* exposes those responsible to potential civil and criminal liability.
6. The unpredictability of unplanned wildfire starts as to location, time, fuels, and overall conditions precludes required pre-planning, approval, and preparation to meet standard Rx fire requirements. Hence, allowing a fire to burn as a *Managed Wildfire* typically becomes a “...fool’s errand and a game of Russian Roulette.”
7. Clearly [for the foreseeable future], the goal should be to put out every fire immediately as the most effective method of reducing the full range of adverse impacts associated with

wildfires. Failure to do so can increase the true cost of wildfires up to 30 times the cost of actual suppression when natural resource, private property, and local community economic losses are taken into account.

8. Claims that a century of aggressive fire suppression is responsible for today’s fuel buildups are not factually supported. And, under current conditions due to the impacts of climate unpredictability, can be just an intellectual argument.
9. The use of *Managed Wildfire* by the USDA Forest Service can be a way to circumvent the strict guidelines associated with Rx fire.
10. The USDA Forest Service does not remove enough fuel left after a wildfire -- *managed* or otherwise -- thereby leaving excess fuel loading to stoke subsequent wildfires and unnecessarily endangering local communities. Smoke is also a killer¹⁹¹ [see also page 14]. Thus, the ultimate goal for the foreseeable future should be to keep all wildfires small.

Conclusion: Putting all fires out immediately is very cost effective; large fires are unimaginably expensive and destructive. On average, total economic losses can range between 15 to 30 times direct suppression costs. So, at this point in time, it is critical to put all fires out quickly with an aggressive Initial Attack. Halt the concept of *Managed Wildfire*; no exceptions. The losses in life – directly from fire and indirectly from smoke -- and property from wildfires are completely unacceptable. It does not have to be this way. [A Call to Action](#) is required now. Please help!

Appendix A.20. The Destruction of Weed, California by Wildfire^{192,193}

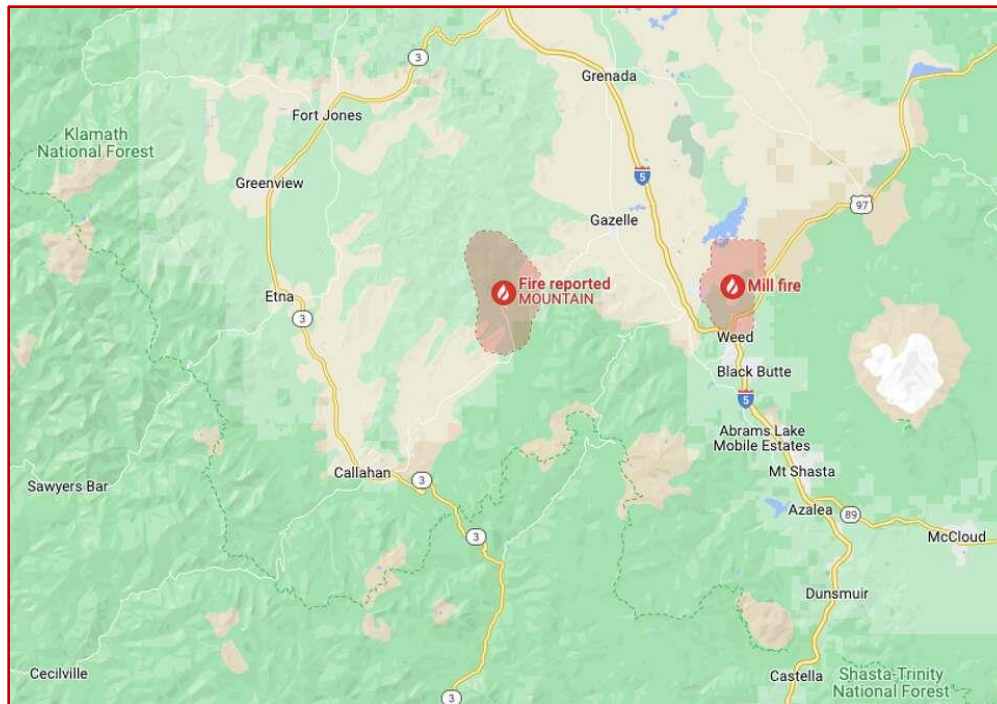


FIGURE 1. THE LINCOLN HEIGHTS NEIGHBORHOOD OF WEED WAS LARGELY IN RUINS SATURDAY, SEPT. 3, 2022, AFTER THE MILL FIRE BURNED THROUGH THE AREA THE DAY BEFORE. RYAN SABALOW RSABALOW@SACBEE.COM

Weed, California was a company town, anchored by a lumber mill and a nearby neighborhood populated by Black workers recruited from the South a century ago to work in the mill. Now both have been devastated by wildfire. The Mill Fire tore through parts of the Roseburg Forest Products mill and destroyed much of the Lincoln Heights neighborhood, a tight-knit working-class community that sprang to life in the 1920s to house Black millworkers.¹⁹⁴ Weed is another long list of rural towns and communities being wiped away by wildfires – part of an ongoing National Emergency that has too long avoided action and required change.

Appendix A.20 is very personal to me.¹⁹⁵ While working on a “P-Line Survey Crew” for the Shasta-Trinity National Forest [USDA Forest Service], stationed at McCloud, I became very familiar with the town of Weed and the surrounding communities. Then, circa 1966, the forests were much better maintained than now. Times have so changed. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn anywhere,

for whatever reason, for the foreseeable future, is unacceptable and all unplanned wildfire ignitions must be stopped immediately or the Weed incidents will continue to become common place. This does not have to be.



FIGURE 2. HOMES ARE SEEN BURNED IN THE LINCOLN HEIGHTS NEIGHBORHOOD OF WEED, CALIF., ON SATURDAY, SEPT. 3, 2022, AFTER THE MILL FIRE TORE THROUGH THE HISTORICALLY BLACK NEIGHBORHOOD THE DAY BEFORE. RYAN SABALOW
RSABALOW@SACBEE.COM

Taken from the article by the Sacramento Bee:¹⁹⁶

The [Mill] fire marked a catastrophic chapter for this city of 2,600, which was named for timber tycoon Abner Weed, who emigrated from Maine and bought a small lumber mill for \$400 in 1897. Ironically, he [Abner Weed] picked the location after discovering “that the area’s strong winds were helpful in drying lumber,” according to the city’s website.

By the 1920s, the facility was owned by the Long Bell Lumber Co., which recruited Blacks from its mills in the South, paid their train fare and moved them to Weed, according to an account by James Langford, a retired school teacher from Weed who has researched the city’s history. The newly arrived workers mainly lived in company-supplied housing in a nearby neighborhood called the Quarters. Years later it [the Quarters] would be renamed Lincoln Heights.

Langford, who was Weed’s first Black schoolteacher, said in an interview that Long Bell [Lumber Co.] ran Weed as a company town. Millworkers were expected to buy their groceries, clothing and other necessities at a company-owned store called the Mercantile. The building still exists as an indoor shopping center.

Long Bell [Lumber Co.] — known to some as “Ma Bell,” according to Langford — kept the community racially segregated. The mill was no different. Whites worked inside, while Blacks

were relegated to manual labor outdoors. “Outside work was the harder work,” said Langford, who moved to Weed in the 1970s after finishing college in San Francisco. A decade ago, he [Langford] helped produce a documentary about the neighborhood, “From the Quarters to Lincoln Heights.”

The Lincoln Heights neighborhood of Weed was largely in ruins Saturday, Sept. 3, 2022, after the Mill Fire burned through the area the day before.

Long Bell [Lumber Co.] eventually became part of International Paper Company and later the mill was taken over by Oregon-based Roseburg [Forest Products].

Note:¹⁹⁷ Unplanned wildfire ignitions destroy more than property and homes. They can eliminate cultures that are the very fabric of America – like Lincoln Heights. This National Emergency – the lack of forest maintenance and the associated impacts of unplanned wildfires -- must be addressed now, lest the fabric of our country continues to become unraveled.

Appendix A.21. NACO [National Association of Counties] Policy Resolution^{198, 199}

NACO Policy Resolution on USFS Rulemaking and NEPA for Formalizing County Coordination and Cooperating Agency Status, Focus on Local Conditions and Public Involvement in Firefighting and Associated Interdisciplinary Resource Management

Issue: Wildland Fires continue to take lives, livelihoods and destroy millions of acres of lands and resources with the United States Forest Service (USFS) operating under a Wildland Fire Management “Direction” and “Strategy” that circumvents the Administrative Procedures Act, The National Forest Management Act (NFMA), and the National Environmental Policy Act (NEPA) as well as the required inclusion of cooperating agencies, including counties and states, coordination with state and local governments, and the requisite transparency, public engagement and input.

Proposed Policy: The National Association of Counties (NACo) urges the United States Forest Service to promulgate an official Wildland Fire Fighting and Interdisciplinary Resource Management rulemaking process coordinated with state and local governments, and developed with counties as cooperating agencies and with public involvement in every step. This federal rulemaking requires a NEPA analysis and public disclosure of the interdisciplinary environmental effects upon the American people, their states and county governments of the implementation of the preferred Wildland Fire Fighting and Interdisciplinary Resource Management Alternative. The preferred management alternative will be determined in the rulemaking through transparent and accessible public involvement, coordination with state and local governments and county governments will participate in the USFS led NEPA analysis as cooperating agencies. This process is a well-known rulemaking process that is imperative for the USFS to lead and engage counties via county cooperating agency status and is not a one size fits all just as Forest Plans.

Background: Western region counties are dealing with the devastating effects of an ever-increasing number of acres burnt (6.5 million acres in 2021) in megafires at temperatures and intensities that leave nothing but scorched earth in their wake; lives lost; homes, businesses and livelihoods destroyed; and adverse environmental effects on our natural resources including wildlife and resulting in watershed degradation. These fires cross county and community boundaries and consume federal, state and private lands in their path.

The adverse and cumulative environmental effects from wildland fire include the human health conditions caused by the millions of megatons of CO₂ emissions in smoke released into the atmosphere and carried to every state on the continent and beyond. These smoke emissions exceed all human health standards for exposure to mercury and silicates. The loss of life, property damage and the burning of millions of acres of highly productive lands and natural resources have also led to displacement of American families and other residents caused by increases in insurance costs, cancellations and resulting homelessness. From NACo 2022 Annual **Conference:** Platform Changes and Policy Resolutions 07.24.22 From a USFS budget perspective, the cost to fight mega fires is enormous and we need to address and coordinate effectively at the local level through Rulemaking and NEPA with County Cooperating Agency

Status. This would give us consistency and an opportunity to engage through the USFS (and other) federal planning processes that require public input. This public input process provides the mandated transparency of federal agency plans that potentially adversely affect people and adversely affect the natural resources that the federal agency has the statutory authority to actively manage. It provides the opportunity to allow the USFS to better educate and inform regarding the USFS interdisciplinary resource management plans at the local level and considering the unique characteristics of each National Forest, State and Private Forestry Programs and county, tribal and state entities with cooperating agency status at the local level through existing and congressionally mandated public involvement processes.

This process will support updated firefighting technology to address challenges in access and safety while restoring the forest mosaic. Our watersheds have been stressed due to drought and after wildland fires, are further degraded by catastrophic surface runoff, resulting mudslides and downstream and Basin -wide floods for years after a fire and then during costly watershed restoration.

NACo supports the counties in their cooperating agency status and authorities in their imperative participation in the development of land management plans. However, many Forest Plans are currently in Plan Revision without a Wildland Fire Fighting and Interdisciplinary Resource Management Rule formalized through rulemaking, county and public involvement and analyzed as to environmental effects of implementation. This deficiency is creating an impossible situation for counties as they are blocked by non- engagement in the current USFS Chief’s Strategy to continue to let fires burn for presumed resource “benefits”. To date, no Forest Plan Revisions contain other than “administrative intent” in the land and resource management plan.

NACo further urges Congress to take immediate action to schedule Senate Energy and Natural Resources Committee Hearings in this 2022 Legislative Session requiring the USFS to address their deficient management strategy and partnership with the Natural Resource Conservation Service (NRCS), without the required rulemaking and environmental analysis of their wildland fire management actions and the impact on people and all natural resources.

Fiscal/Urban/Rural Impact: Rulemaking and NEPA would allow counties to be engaged as cooperating agencies to represent the interests of their constituents and the American people in providing policy input and development of the formal common sense and interdisciplinary science-based wildland fire management alternatives with the associated environmental impact statement regarding the preferred alternative. The current USFS Strategy (and partnership with NRCS on state and private lands) continues a long history of internally developed wildland fire management frameworks and internal policy directions. The continued use of non-binding wildland fire management strategies has adversely affected counties, their residents, their visitors and the American people by impeding and destroying the opportunities to continue a From NACo 2022 Annual Conference: Platform Changes and Policy Resolutions 07.24.22 strong and vital stewardship relationship in the active management of their public lands and resources.

Sponsor(s): Viki Purdy, Commissioner Adams County, Idaho; Daniel Anaiah Kirk, Supervisor Tuolumne County, California; Jack Lytle, Commissioner Daggett County, Utah.

Appendix A.21.1. Follow-up to the NACO [National Association of Counties] Policy Resolution to Plumas County Board of Supervisors, Quincy, CA

Note: The following is a very instructional letter regarding the NACO Policy Resolution from local resident Mr. Gaylord Briggs. The letter effectively summarizes the need for *A Call to Action*. Following the letter is a summary of critical actions that could deploy the *Resolution*.

Plumas County Board of Supervisors
Quincy, CA.

October 5, 2022

Gaylord Briggs
108 Shasta Way
Mount Shasta, CA. 96067

RE: NACO position, H.R. 6903

Honorable Board Members:

Why should all wildfires be responded to with every reasonable and available fire suppression forces as soon as possible? The proof of doing otherwise lies in your own county. The Dixie Fire did not need to be nearly a million acres of “managed fire” treatment. The private timberland owners that had their lands impacted with this “managed” fire are not very pleased with the results, and the home and business owners who suffered catastrophic losses are devastated. This is not the only instance. This scene has played out scores of times over the past 2-3 decades, the fires are only getting bigger and more deadly and yet the federal government continues with the same approach!

During these times of extreme drought and climate the last thing we need to be doing on our wildland landscapes is play with fire. Enough fires will escape and become significant events despite our best and most aggressive efforts. To wait and see what each fire start will turn into before we decide to take suppression action is foolhardy. The staggering losses to resources, landscapes, habitat, wildlife, watersheds, soil and water quality, property and human lives is unconscionable, not to mention the billions of dollars spent in suppression and “fire management” costs. The Forest Service seems unwilling, or incapable of putting aside this highly risky and failed policy, so you must take action to protect your county from further disasters. Please adopt the full NACO position that has been submitted to you and support HR 6903. Thank you.

Gaylord Briggs: Former Plumas County resident, California Reg. Pro. Forester No. 70;
Almanor District Forester Kimberly-Clark Corp. (1969-1979);
California Timberland Manager Roseburg Resources Co. (1979-2003)

The NACO Resolution; *First Put Out the Fire*; *A Call to Action*; HR-6903; and other combined efforts must continue with increased aggressiveness to inform Congress and other who “decide” to;²⁰⁰

1. Aggressively suppress all wildfires with a 24-hour containment objective.
2. Halt all aspects associated with allowing a wildfire to burn.
3. Remove unburned timber and other fuels after a wildfire thereby not leaving a *tinder box* for the next start.
4. Return to 9 BBF [Billion Board Feet] annual timber harvest plus removal of other forest products from America’s public lands to ensure forests are sustainable and more resilient to disturbances, such as wildfires.
5. Aggressively engage in all aspects of active forest maintenance.
6. Aggressively counter all efforts by those opposing active forest stewardship [i.e., management, protection and wise use].

Accomplishing the above requires:

1. Ensuring that the United States Forest Service [USFS] has the necessary funding, legislation, leadership, and staffing skill-set to comply with the direction in the Organic Act through Congressional action and direction.
2. That the Administration, USDA [United States Department of Agriculture] and USFS leadership understand and support the above principles and concepts [aforesaid 1-6].
3. That individual Counties demand that the National Forests are properly protected and managed to ensure the well-being of communities and their residents.

A Call to Action [America’s Forests in the Balance: A National Emergency] is a comprehensive document that provides an excellent roadmap, along with the other items listed above, to ensure that America’s National Forests are restored to a healthy, productive and sustainable state in accord with the direction in the Organic Act.²⁰¹

**IF
YOU
CHANGE
NOTHING,
NOTHING
WILL
CHANGE.**

Another Past Reflection: <https://www.berkeleyside.org/2022/10/19/listen-remembering-the-1991-oakland-berkeley-firestorm>

Appendix A.21.2. NACO [National Association of Counties] Final Policy Resolution²⁰²

NACO Policy Resolution on USFS Rulemaking and NEPA for Formalizing County Coordination and Cooperating Agency Status, Focus on Local Conditions and Public Involvement in Firefighting and Associated Interdisciplinary Resource Management

Issue: Wildland Fires continue to take lives, livelihoods and destroy millions of acres of lands and resources with the United States Forest Service (USFS) operating under a Wildland Fire Management “Direction” and “Strategy” that circumvents the Administrative Procedures Act, The National Forest Management Act (NFMA), and the National Environmental Policy Act (NEPA) as well as the required inclusion of cooperating agencies, including counties and states, coordination with state and local governments, and the requisite transparency, public engagement and input.

Proposed Policy: The National Association of Counties (NACo) urges the United States Forest Service to promulgate an official Wildland Fire Fighting and Interdisciplinary Resource Management rulemaking process coordinated with state and local governments, and developed with counties as cooperating agencies and with public involvement in every step. This federal rulemaking requires a NEPA analysis and public disclosure of the interdisciplinary environmental effects upon the American people, their states and county governments of the implementation of the preferred Wildland Fire Fighting and Interdisciplinary Resource Management Alternative. The preferred management alternative will be determined in the rulemaking through transparent and accessible public involvement, coordination with state and local governments and county governments will participate in the USFS led NEPA analysis as cooperating agencies. This process is a well-known rulemaking process that is imperative for the USFS to lead and engage counties via county cooperating agency status and is not a one size fits all just as Forest Plans.

Background: Western region counties are dealing with the devastating effects of an ever-increasing number of acres burnt (6.5 million acres in 2021) in megafires at temperatures and intensities that leave nothing but scorched earth in their wake; lives lost; homes, businesses and livelihoods destroyed; and adverse environmental effects on our natural resources including wildlife and resulting in watershed degradation. These fires cross county and community boundaries and consume federal, state and private lands in their path.

The adverse and cumulative environmental effects from wildland fire include the human health conditions caused by the millions of megatons of CO₂ emissions in smoke released into the atmosphere and carried to every state on the continent and beyond. These smoke emissions

exceed all human health standards for exposure to mercury and silicates. The loss of life, property damage and the burning of millions of acres of highly productive lands and natural resources have also led to displacement of American families and other residents caused by increases in insurance costs, cancellations and resulting homelessness.

From a USFS budget perspective, the cost to fight mega fires is enormous and we need to address and coordinate effectively at the local level through Rulemaking and NEPA with County Cooperating Agency Status. This would give us consistency and an opportunity to engage through the USFS (and other) federal planning processes that require public input. This public input process provides the mandated transparency of federal agency plans that potentially adversely affect people and adversely affect the natural resources that the federal agency has the statutory authority to actively manage. It provides the opportunity to allow the USFS to better educate and inform regarding the USFS interdisciplinary resource management plans at the local level and considering the unique characteristics of each National Forest, State and Private Forestry Programs and county, tribal and state entities with cooperating agency status at the local level through existing and congressionally mandated public involvement processes.

This process will support updated firefighting technology to address challenges in access and safety while restoring the forest mosaic. Our watersheds have been stressed due to drought and after wildland fires, are further degraded by catastrophic surface runoff, resulting mudslides and downstream and Basin -wide floods for years after a fire and then during costly watershed restoration.

NACo supports the counties in their cooperating agency status and authorities in their imperative participation in the development of land management plans. However, many Forest Plans are currently in Plan Revision without a Wildland Fire Fighting and Interdisciplinary Resource Management Rule formalized through rulemaking, county and public involvement and analyzed as to environmental effects of implementation. This deficiency is creating an impossible situation for counties as they are blocked by non- engagement in the current USFS Chief’s Strategy to continue to let fires burn for presumed resource “benefits”. To date, no Forest Plan Revisions contain other than “administrative intent” in the land and resource management plan.

NACo further urges Congress to take immediate action to schedule Senate Energy and Natural Resources Committee Hearings in this 2022 Legislative Session requiring the USFS to address their deficient management strategy and partnership with the Natural Resource Conservation Service (NRCS), without the required rulemaking and environmental analysis of their wildland fire management actions and the impact on people and all natural resources.

Fiscal/Urban/Rural Impact: Rulemaking and NEPA would allow counties to be engaged as cooperating agencies to represent the interests of their constituents and the American people in providing policy input and development of the formal common sense and interdisciplinary

science-based wildland fire management alternatives with the associated environmental impact statement regarding the preferred alternative. The current USFS Strategy (and partnership with NRCS on state and private lands) continues a long history of internally developed wildland fire management frameworks and internal policy directions. The continued use of non-binding wildland fire management strategies has adversely affected counties, their residents, their visitors and the American people by impeding and destroying the opportunities to continue a From NACo 2022 Annual Conference: Platform Changes and Policy Resolutions 07.24.22 strong and vital stewardship relationship in the active management of their public lands and resources.

Sponsor(s): Viki Purdy, Commissioner Adams County, Idaho; Daniel Anaiah Kirk, Supervisor Tuolumne County, California; Jack Lytle, Commissioner Daggett County, Utah

Appendix A.22. Reflections on a Tragedy – Two Years Later²⁰³

Note: Two years ago, after hundreds of his cattle were killed by the [Bear Fire](#), lifelong rancher Dave Daley²⁰⁴ posted a lengthy [story](#) [*I Cry for the Mountains and the Legacy Lost*] on his Facebook page about the loss and its impact on him, his family and even the surrounding mountains. This [story](#) will captivate you; alarm you and should force you into *A Call to Action*.

The following is a reflection from Mr. Daley, two years later.²⁰⁵



Two years ago, I received a call that the Bear Fire (part of the North Complex Fire) had jumped the Middle Fork of the Feather River and was tearing through our cattle range, between La Porte and Feather Falls heading towards Oroville. I will never forget that day or the weeks that followed. Everything destroyed. Sixteen people killed in the town of Berry Creek and the entire little town obliterated.

The community of Feather Falls was destroyed. Hundreds of our cows, all the wildlife and the incredible ecosystem above Lake Oroville were completely erased. Forever.

I have visited other post-fire landscapes throughout California (those scarred by the Dixie, Thomas, Creek, Caldor and others). Those fires were horrific, but I have never seen anything of the intensity of the Bear Fire. Literally nothing alive. Steep terrain, winds that exceeded hundred-mile gusts at times, massive fuel loads ... and the devastation was complete. There were areas where the burnt pine needles were literally at right angles from the tree – charred in place by the incredible winds.

So, what has changed in two years? There has been some progress in the discussion to reduce fuel loads through prescribed fire, thinning, grazing and timber management – but the conversation has resulted in little action.

The good: There are more prescribed fire associations being organized; the California Cattlemen’s Association led a legislative effort to create an “Ag Pass for Livestock,” loosely based off my experience trying to gain access to my range to protect livestock during the Bear Fire, that has been signed into law by Governor Newsom; legislation was passed and signed limiting liability for prescribed fire practitioners; and there is increasing recognition (and data) that grazing to reduce fuel loads can lower fire intensity. Good. But it is not nearly enough.

I have been having conversations with legislators and regulators in Sacramento and Washington, D.C. who have begun to recognize the scope of the problem that is devastating the West. Talk is cheap, but at least acknowledging the challenge with some bipartisan agreement provides a slim ray of hope. Yet, there are still no projects at scale – landscape level projects that truly could change the trajectory of destruction.

I see local prescribed fire associations that are excited to do a 20-acre control burn! I applaud their enthusiasm and it is a start, so I am not being critical of the effort, but it is a drop in the proverbial bucket. We spend resources to meet and map and study and discuss and form groups to study it again. Sorry – that is a waste of precious resources (people, time and dollars) that should be at work on the landscape. As I said two years ago ... DO SOMETHING. Please. Ask those who live and work on the land for solutions.

I have yet to see meaningful resources directed to the post-fire management landscape. What about government programs to assist private landowners and state and federal land management agencies with post-fire cleanup, recovery and reforestation? Many of these lands are left with dead timber, only to have brush sprout in the deadfall, creating yet another massive fuel load. Timely post-fire management would allow these lands to become natural fuel breaks to prevent the next megafire. Why haven’t we actively applied the proven tools of prescribed fire, replanting, timber management and grazing? It is almost as if once it is burnt, the government ignores the problem and focuses resources elsewhere.

To be blunt, the government has created impossible legislative and regulatory barriers (the California Environmental Quality Act and National Environmental Policy Act, for example) that bureaucratize the rapid deployment of resources to even rebuild communities, let alone the landscape. Paradise, the town destroyed by the 2018 Camp Fire just received word of federal funding to rebuild infrastructure ... four years later! And yet, the natural lands – the water, the forests, the wildlife and the people that live there – are forgotten. And yet those lands belong to all of us. I wish there was some consideration given to our ecosystems that literally support us all. Out of sight, out of mind? Tragic.

Cattle ranchers can be part of the solution if resources are provided to help them create significant fuel breaks to give first responders a real chance. As a collective, cattle ranchers own or manage over 38 million acres of rangeland in California. And as a group, they are the largest property owners and managers in the state.

We took a small “test” group of cows back to the Plumas National Forest this year. It has been ugly and difficult. It is not the spectacular beauty of the Sierra Nevada that we have loved forever. But it was important to all my family to continue.

My kids (not kids anymore!) were as adamant as me and said, “we’re going.” The cows are doing fine on the limited recovery we are seeing on the allotment, and we hope to be able to take our full permitted numbers again next year. But the contrast between the checkerboard of private and federal lands is shocking. Sierra Pacific Industries (our landlord on half the range) has aggressively removed the burnt timber for the past two years and has replanted millions of trees. The Forest Service has done nothing.

The Plumas National Forest just released a very small timber sale of a few hundred acres along the only primary government road in the range. The dense canopy of burnt trees has been standing dead for two years, waiting for a big north wind when the black giant trees will all fall at once. There is no value in the timber and no mills that have room to take the logs. The federal lands are a massive deadfall waiting to burn again. At least 35,000 acres of devastated federally owned land are completely untouched in my grazing allotment alone! Bureaucracy doesn’t work. The wheels are too slow, the hurdles too high and the result can be seen in any of these post-fire landscapes on federal and state land.

We burnt over 4 million acres in 2020, and 2.5 million acres last year, and I expect we will exceed that this year. Once it’s burnt, it is forgotten. I won’t forget the Bear Fire. Ever.

Our cows are starting to calve in this blackened landscape. I saw several baby calves today. The beautiful forest of my childhood and the generations who came before is no more. The dead trees stand as silent beacons and reminders of our arrogance and ignorance. The roar of silence echoing down the dead canyons has replaced the constant murmur of life. We created this devastation and have no one to blame but ourselves. Not listening to the land. Not listening to the wisdom of the past. It saddens me.

And the three-day-old calf that we found amid that devastation two years ago that I gave to my baby granddaughter, Juni? I saw that young cow in the mountains today. We took that orphan and raised her on a bottle. This past May she went back to the land where she was born during that hellish maelstrom. How did she make it when hundreds of others did not? We will never know. Juni, now two years old, was with us when we unloaded her young cow in the mountains. Juni won’t quit either.

Resilient? Ranchers define the word.

Appendix A.23. Better That They Burn²⁰⁶



Our western national forests are on life support following decades of lousy doctoring.

By Jim Petersen

Yet another god-awful wildfire season is winding down in the West. Forest Service Chief Randy Moore was forced to remove prescribed fire from the agency's toolbox on May 22 after the disastrous Hermits Peak/Calf Canyon Fire in New Mexico blew past 300,000 acres. It began as an ill-advised prescribed burn in April.

Here's hoping we've heard the last of all the Forest Service happy talk about "fire for ecosystem benefit." The West's forests are too dry. Call it climate change, call it prolonged drought, I don't care. The moisture content in western forests is now less than it is in kiln-dried lumber. Less than six percent. It's too damned dry to be playing with matches in the woods.

In the near term, there isn't much we can do about the climate but there is a great deal we can do to stuff the Bad Wildfire Genie back into her bottle. Begin with the fact that our national forests hold too many trees for the carrying capacity of the land. They are

dying by the millions because they lack sufficient moisture, sunlight and soil nutrients.

What to do? *Primum non nocere*. That's Latin for "First, do no harm." It's the Hippocratic oath taken by physicians. It means be damned careful with your chosen diagnosis and treatment. You could make your patient even sicker.

Our western national forests are on life support following decades of lousy doctoring. Think of this disease as a virulent cancer. Left untreated, it will kill what's left of the West's federal forest estate. More than half—about 100 million acres—is already dead, killed by wildfire or disease, usually both. What is so damned maddening about this inexcusable mess is that a safe and effective two-step treatment has been around for decades: Thinning first, then controlled burning to further reduce the wildfire risk. States, Indian tribes and private timberland owners use these treatments annually in their forests.

The Forest Service relied on this same

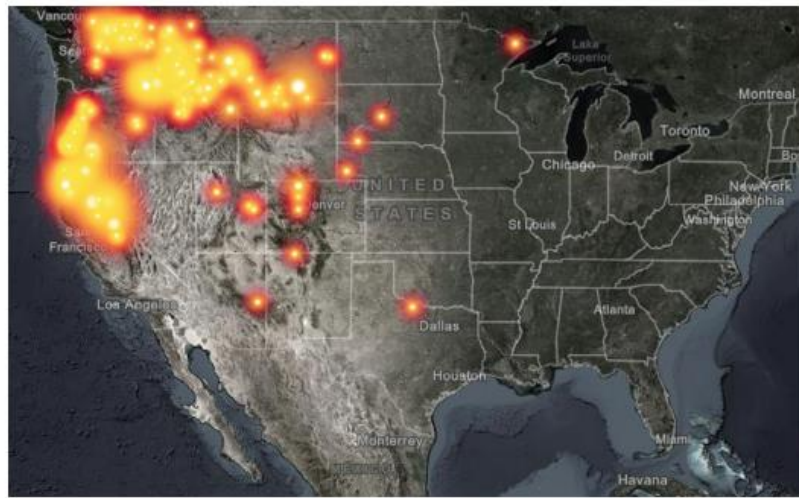
two-step treatment in the Interior West for decades. But faced with withering public criticism from the anti-forestry mob, it gave up on forestry and itself. The tipping point was the federal government's 1990 decision to list the northern spotted owl as a threatened species. The rural West's timber economy cratered in the aftermath. Some 80,000 jobs vanished in the Pacific Northwest. I've never seen an estimate of losses in the 11 western states, but I'd guess another 80,000. Less noticed in the collapse was the near mortal damage done to Forest Service morale. I know this story because six of our past and present Evergreen Foundation board members devoted their professional lives to the Forest Service.

There are 1,168 species on the Endangered Species Act's threatened and endangered lists: 884 plants; 307 insects, mollusks and other invertebrates; 163 fishes; 96 mammals; 95 birds; 36 reptiles; 35 amphibians; and two fungi. Fifty-four species have been delisted, most notably the North American gray wolf. Scientists believe there are about 8.7 million species on Earth, though only about 1.2 million—mostly insects—have been identified. Some 18,000 new species are identified

annually. I don't know how many classify as insects but a Google search tells me most of these new species are creatures that live deep in oceans or in regions where there is little human habitation.

I understand public concern for the loss of species. What I don't understand is our failure to embrace strategies for protecting the habitats favored by threatened or endangered species. How many acres of federally designated spotted owl habitat have been lost in devastating wildfires since the owl was listed? I think about two million acres, but my estimate could be low.

Most Americans can't comprehend any of this. They live in cities or sprawling urban centers generations distant from their rural roots. Farmers and ranchers now comprise



Who could possibly think that forsaking decades of forest management successes for the unknowns that accompany wildfire was a good idea?

TOP RIGHT: This graphic illustrates the enormity of the wildfire crisis the Forest Service was facing in the West in 2021. The Dixie Fire, the second largest in California history, was one of dozens of wildfires that stretched state and federal firefighting resources near the breaking point. The only safe and reliable method for breaking this cycle of fire is a long-term West-wide thinning program aimed at reducing the frequency, size and intensity of these fires. ABOVE: Fire is not our enemy when used properly by trained professionals. RIGHT: Forest Service Chief Randy Moore, far right, is briefed on a wildfire somewhere in California in 2021. California has become ground zero in the West's wildfire pandemic. About 2.6 million acres were lost in 2021 in 8,835 fires. Dixie was by far the largest.



0.008 percent of the nation's population. Loggers and millworkers, about half that. All factory workers, about 12.8 million. That's less than four percent of our population. None of us should be surprised that so few Americans have any idea where their “stuff” comes from.

And so we return to the scene of the crime: millions of acres of dead and dying trees in publicly owned national forests that could still be green and growing if the Forest Service had cared for them rather than handed most of the job to “nature.” Nature doesn't give a damn about our wants and needs. The Forest Service has known for decades that its “we can't take sides” explana-

tion for its public silence in the face of searing criticism from the anti-forestry mob was a loser, but it stuck with it because it did not want to “offend environmentalists” with the truth about their lies.

Meantime, environmentalism's culture warriors busied themselves destroying public confidence in the Forest Service and a western lumber industry that was generationally devoted to its communities and its workers. Now that industry is gone, the communities it supported will never be the same again, the Forest Service is a mere shadow of its former

self, millions of national forest acres have been incinerated and the anti-forestry mob is standing buck naked on a public stage illuminated by the flames of the largest wildfires in known ecological history. No wonder they look like deer caught in headlights.

I don't care what happens to the anti-forestry mob, but I do hope that the Forest Service can recover from its fall from public grace. Its story is the conservation story and the conservation story is the forestry story. I identify the high points in the agency's remarkable tale in “Felt Necessities,” a 10-part



ABOVE: A mechanical harvester cuts a firebreak through Northern California's Lassen National Forest, scene of the 963,309-acre Dixie Fire that wiped out Greenville, population 817, in July 2021. The town is 45 miles from LNF headquarters in Susanville. It would have survived the fire if the Forest Service had an ample thinning program in place. It doesn't. BELOW: The lightning-caused Bootleg Fire, northeast of Klamath Falls, Ore., burned 413,765 acres of forest and rangeland in July and August of 2021. It was the nation's second largest wildfire in a dreadful fire season that saw 408 buildings, 161 homes and 342 vehicles destroyed. This aerial photo teaches important lessons about treating forests to reduce wildfire risks. The green area had been thinned before logging slash was burned, the greenish-brownish area had been thinned but no slash disposal, and the totally brown area has not been treated. Thinning and prescribed [RX] fire is a one-two combination with a long history of success. It beats “managed fire” seven ways from Sunday.



series on Evergreen's website at www.evergreen.com.

If Chief Moore wants to steer a course correction—and I believe he does—he should start by introducing the Forest Service's 30,000 employees to their own history. I'll bet 90 percent of them know next to nothing about the agency's 117-year legacy or the string of post-Civil War events that led to its founding in 1905. This story isn't boring. Far from it. The roles played by a large cast of colorful characters changed the course of American history several times.

The Forest Service is currently about 13,000 hires short on the forestry side: technicians, engineers and “ologists” lost through retirement, attrition, layoffs and a poorly conceived shift in funding from its legendary forestry operation to its much newer firefighting operation.

This transition brought with it disastrous environmental and economic consequences. Who could possibly think that forsaking decades of forest management successes for the unknowns that accompany wildfire was a good idea? It turns out that many who joined the Forest Service in the 1990s thought that using “managed fire with resource benefits” was a good idea. Likewise, many hired in the 1980s held fast to the post-World War II “get out the cut” mantra that turned most Americans against the Forest Service during the war in Vietnam.

The anti-forestry mob hopes the public thinks this is still the Forest Service's modus operandi. It isn't. In Montana, tree mortality currently exceeds growth by 1.4 billion board feet. In 2016, mortality topped harvest by a factor of 26 to one. Same story in every western national forest. Again, too many trees for the carrying capacity of the land. Mortality and wildfire follow.

To be sure, fire is an excellent forest management tool when used properly at the right time in the right place, but now is not the time and there is no right place in the drought-stricken West, which helps explain why Chief Moore took prescribed fire off the table last May. That it took so long attests to the seductive lure of the “let nature” malarkey that environmentalists have been peddling for

decades. Succumbing to this temptation destroyed the Forest Service, which was, by public consensus, one of the two most admired organizations in the nation in 1952 and 1953. The other was the U.S. Marine Corps. Not bad company to keep.

Today Forest Service morale is in free fall, leadership is scattered and faltering, and few know how to navigate the complex and often conflicting regulatory maze that Congress and policy-makers have erected over the last four administrations.

I'll bet not one Forest Service employee in

100 can recite the agency's seven-word motto from memory. It's "Caring for the Land and Serving People." The land isn't being cared for and the only people being served are rabid environmentalists who don't care if every national forest in the West burns to the ground as long as none of those dead or dying trees are sold to "greedy loggers and lumbermen." Better that they burn in killing wildfires. ■

Jim Petersen is the founder and president of the nonprofit Evergreen Foundation (1986). He has been working on forest research and education for decades. Tax-deductible contributions are welcome via PayPal at www.evergreenmagazine.com or by personal check to 7666 N. 15th Street, Dalton Gardens, Idaho 83815. Thank you!



AT TOP: Roadside thinning in dead and dying timber near Missoula, Mont. ABOVE: Peter Kolb's 2021 thinning on his tree farm near Evaro. Kolb is forester for Montana State University Extension. The Ph.D. forest ecologist also teaches at the University of Montana in Missoula.

Appendix A.24. The Concept of *Managed Wildfire* [Expanded]²⁰⁷

In the October 2022 *Smokeyjumper* Quarterly Magazine [pages 10-14], I thought the article by Robert Hirning entitled “Forest Fires and National Defense Policy” was especially informative and instructional. I believe much of his piece coincides quite closely with the document entitled, “America’s Forests in the Balance: A National Emergency [*A Call to Action*]”—a continuing text developed by 60 [and counting] professionals over the least three years. The section in *A Call to Action – The Concept of Managed Wildfire* [pages 10-11] – is especially well-linked to Hirning’s contribution. Accordingly, it seems prudent to share *The Concept of Managed Wildfire* in the *Smokeyjumper*.

Managed wildfires are natural ignitions [some refer to them as “unplanned”] which under suitable weather and soil moisture conditions are allowed to burn to meet desired ecological objectives where pre-planned and approved in Forest Plans for the National Forests. This allows fire to play a natural role in restoring the ecosystems by recycling nutrients into the soil and clearing the forest floor of excessive debris. The key is to identify the right kind of fire at the right time at the right place. However, relying on natural ignitions to instantly create an opportunity for a managed wildfire in a random location, without adequate planning and pre-positioning for resources is “...like playing a game of Russian Roulette” as a very respected colleague once concluded. This [*managed wildfire*] is not to be confused with “Prescribed Fire” which is conducted under very specific conditions.

Action item No. 2 on the list of “Top 10 Action” in *A Call to Action* calls for – without exception – the elimination of *managed wildfire* for the foreseeable future. The reality is, with the clogged-up conditions of our forests; hard to predict weather events; and the extremely high level of expertise required to perfectly “herd” a wildfire, *managed wildfire* quickly becomes an escaped fire. Thus, for now, the notion of effectively directing a wildfire to help restore the forest has become largely an intellectual argument and puts others needlessly in harm’s way; causes deaths due to smoke inhalation; and, significantly increases fire suppression costs that continue to shift more funds away from badly needed traditional forest maintenance and the associated loss of critical habitat, wildlife, and soil stabilization from various plant growth.

Further, with the risks associated with the COVID-19 pandemic, the notion of letting fires burn to help accrue forest restoration targets is unconscionable. There is a strong connection between smoke inhalation and the more dire effects of Covid-19. In addition, coronavirus cases in the United States have recently surged with the spread of the highly transmissible variants.

Messages on *managed wildfire* are extremely mixed. On one hand, national direction from USDA Forest Service leaders seems to suggest no more *managed wildfire* due to current conditions. Events on the ground show a far different scenario. This misguidance may be due to available budgets and candidly, stale Forest Service research that promotes *managed wildfire* regardless of different times and conditions [read, promoting an intellectual narrative] [see Note on page 96]. Please know that a steady flow of funding from fire suppression is being used to *manage wildfires* or in reality, attempt to manage a wildfire. The application of pre-approved and planned prescribed fire comes with a much more constrained budgetary account. Using an

unplanned ignition as a de facto prescribed fire and claiming land restoration credits is simply wrong. Perhaps an Office of Investigation [OIG] accounting of this practice is warranted.

As stated above, the practice of *managed wildfire*, especially in the western part of our country, is a huge gamble that can quickly accelerate to an “escaped fire.” This has become all too common in recent years, regardless of good intentions. And, regardless of weather and all the other “fire factors,” the practice of *managed wildfire* requires far too much knowledge and authority by the person making this immediate call; frankly, it’s not a fair fight. There are simply too many factors at risk. The unpredictability of the fire and its destruction in this current time and place will always win.

The outcome of prescribed fire is much more predictable. In recent studies, prescribed fires have shown to be much safer and if deployed carefully and under the right conditions can significantly help reduce hazardous fuels. Increased appropriations by Congress for prescribed burning is a critical step in the right direction.

The concept of *managed wildfire* must be stopped and the careful use of *prescribed fire* needs to be a key tool in a pragmatic forest maintenance regime. It is interesting to note that recently, an extremely well-respected former Forest Supervisor for the USDA Forest Service stated: “...If I were Chief, I would never allow *managed wildfires*; not this year, not EVER.”

Or, as an anonymous Forest Service employee so clearly stated: “...I try to point out the fact that if you’re not out conducting Rx fire [*prescribed fire*] right now, why in the hell do you think you could manage a fire for resource benefit[s].”

Managed wildfire seems to be, as many have suggested, an intellectual theory, that should never be applied, while *prescribed fire* is a great tool that needs much more application and funding.

Here is the bottom line: It is time to declare that all wildfires will be promptly and aggressively extinguished, period; no exceptions. Extremely clear direction is a must. And this direction must be corporately followed. For example, the word “manage” means: to handle or direct with a degree of skill: such as to exercise executive, administrative, and supervisory direction. To us, this means a very hands-on approach. Backing off to the “next best ridge”, while perhaps workable, can hardly be called a “hands on approach.”

On August 2, 2021, the newly appointed Forest Service Chief sent a letter to his leadership team regarding the use of managed wildfire. The key points of the letter: managing wildfire for resource benefits is a strategy we will not use. In addition, “...until further notice, ignited prescribed fire operations will be considered only in specific geographic areas and only with approval by the national office.”

We must be diligent to ensure that clear direction is followed, and for the foreseeable future, all wildfires are to be extinguished immediately; no exceptions. Unfortunately, it looks like the Chief’s letter is *not* being corporately followed. Examples include the recent Tamarack, Dixie and Caldor Fires in California. In fact, America’s Chief Forester published a letter on December

20, 2021 that seems to reverse his position on August 2, 2021, regarding *managed fire*. Where we are now is so unclear. This is unfortunate. The American people deserve better.

Some have called me out on my current stance regarding *managed fire*. That’s fair. In 2018, my colleague Tom Harbour and myself wrote an essay in “193 Million Acres: Toward a Healthier and More Resilient US Forest Service” entitled, “Restoring Fire as a Landscape Conservation Tool: Nontraditional Thoughts for a Traditional Organization.” From an intellectual point of view, I love this essay. But, NOT NOW. These are different times. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn anywhere, for whatever reason, for the foreseeable future, is unacceptable and must be stopped now; no exceptions.

In my view, for now, a dominant Forest Service goal in 2023 and ahead, should be to put out all unplanned wildfire ignitions within 24 hours, no exceptions. I beg you, please help make this a cornerstone of America’s Chief Forester’s annual Letter of Intent for the next decade, at least. The credibility this stance will afford the USDA Forest Service, if corporately deployed, will be immeasurable. We believe the American people expect this on *their* lands. The current landscape conditions will not enable “managed fires” or “beneficial fires” or a “let it burn” policy.

Note: Perhaps I²⁰⁸ should have used a different phrase than “intellectual argument” when referring to “manage” or “beneficial” fire. Clearly, the phrase is correctly attributed to me. The phrase is coming from my background as the Director of the Northern Research Station and the Forest Products Laboratory, USDA Forest Service. Forest Service scientists, who make productive careers out of a particular line of science can be very reluctant to adjust with the times. The rewards system in science is not very conducive to change. Thus, some things become “intellectual” arguments. That is, the “science-based” narrative does not reflect the current times or land conditions, in this example. For me, it doesn’t do any good to reference fire tactics that may or may not have been used 100 years ago. We must be more contemporary to address the practicality of using “fire on the landscape.” Ask the people in Paradise, Greenville or Weed, California what they think.

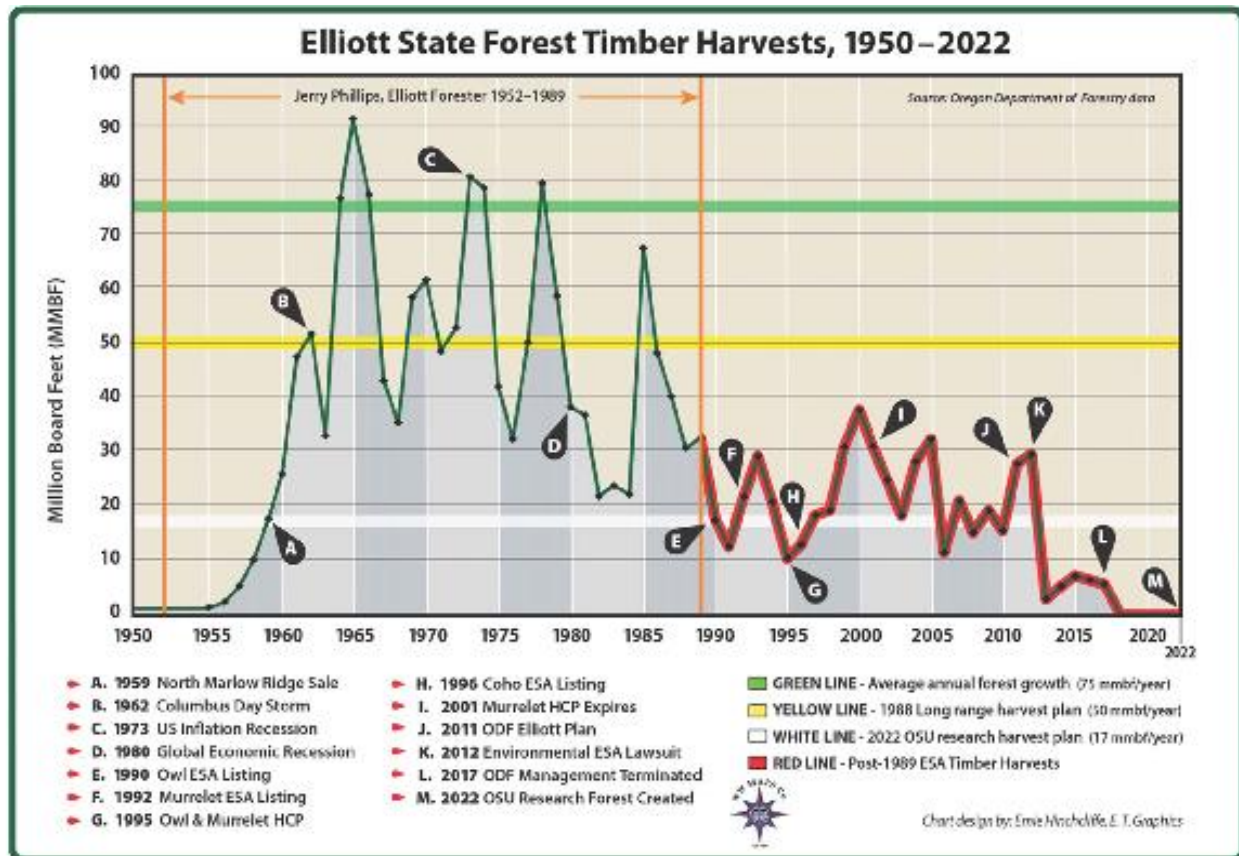
Clearly, I do not believe that fire as a forest maintenance tool has always been an intellectual argument, in total. I refer you to my essay with Tom Harbour, “193 Million Acres: Toward a Healthier and More Resilient US Forest Service, page 129, “Restoring Fire as a Landscape Conservation Tool: Nontraditional Thoughts for a Traditional Organization”, 2018, The Society of American Foresters, Steve Wilent, Editor.

If you read the essay, you can clearly see that I believe in fire as a forest maintenance tool, when it is “...at the right time, at the right place and the fire is right.” Frankly, since I crafted the *National Fire Plan* twenty years ago, I have not seen too many of these situations [i.e., the three “rights”]. Thus, I conclude for NOW, it is not the time to “back off to the next best ridge.” The conditions won’t allow it. And, let’s look at the facts. Over the last decade especially, when we *manage* fire with the current land conditions and the current operative skill set, it has been largely a mess [Dixie, Caldor, Tamarack Fires, as examples].

So, all I am saying is, for NOW, until the forests are in a better condition to accept fire as a maintenance tool, let us have an objective to put all fires out immediately. Then, when the forests [forests are more than just trees] are more accepting, we can and should use fire, under prescription, to meet resiliency objectives. Yes, this will take time. But like our former Chief, F. Dale Robertson often said, “...the Forest Service is in it for the long haul.” The Chief’s annual Letter of Intent for Wildfire for 2024 would be a grand step forward if the letter included the aforesaid objective.

Appendix A.25. HCPs, LSRs, the ESA & Western Oregon Wildfires, 1987-2022

Dr. Bob Zybach, September 22, 2022 [FINAL DRAFT]

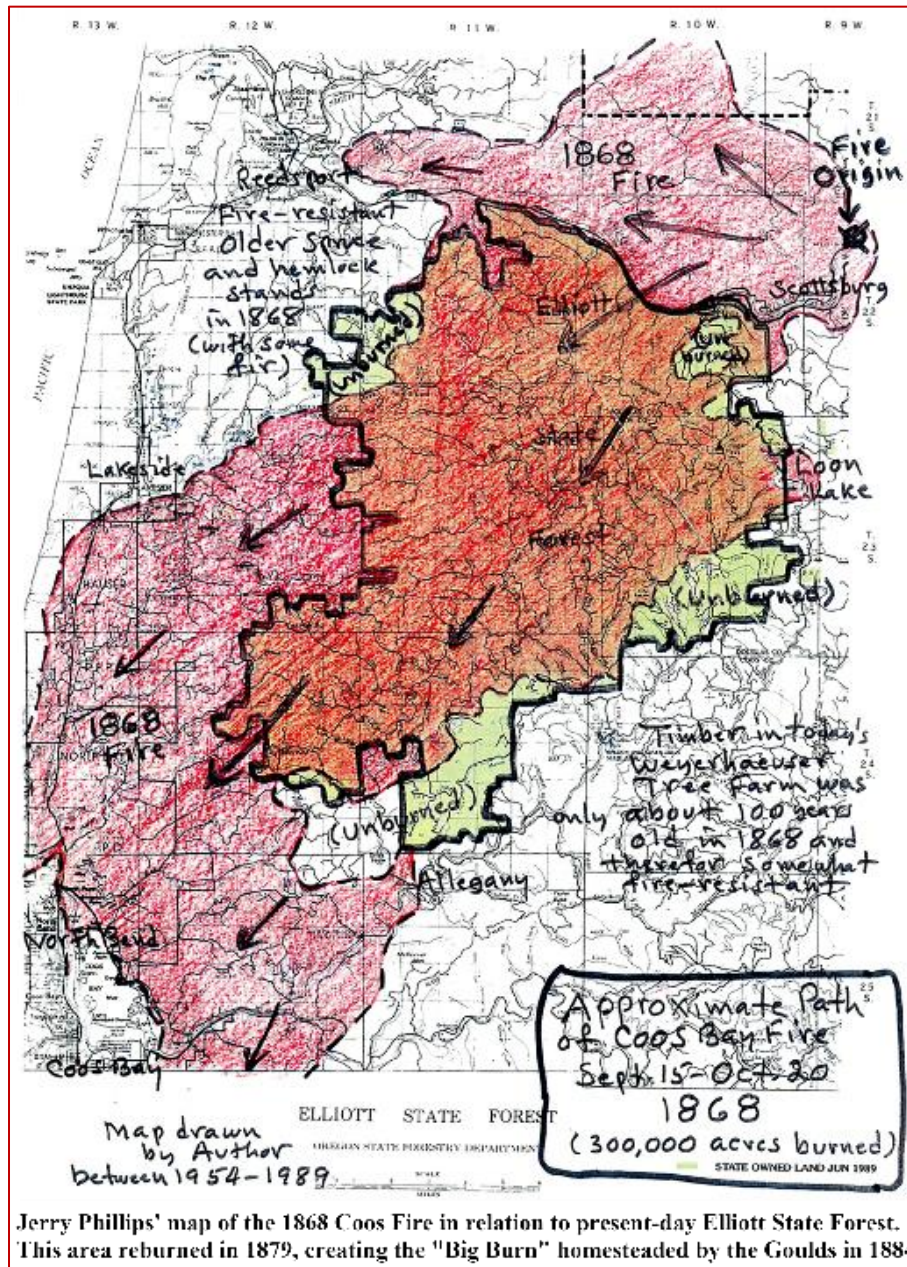


The Green Line represents average annual amount of growth of Elliott State Forest trees;
The Yellow Line represents average allowable cut for the Elliott in the 1988 harvest plan;
The White Line represents OSU's planned annual harvest of the Elliott w/ no snag salvage;
The Area between the Green Line and Red Line represents Elliott fuel increases since 1989.

During the past 35 years, beginning in 1987, western Oregon has experienced the greatest number and extent of catastrophic forest wildfires in its history. Almost all these deadly events took place or began on federal lands managed by the US Forest Service (USFS) or Bureau of Land Management (BLM) under regulations developed from the 1973 Endangered Species Act (ESA) and administered by the US Fish & Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS).

It's the government, so acronyms are obligatory. They are also a form of purposeful obfuscation that help conceal the fact that management of our nation's forests has largely transitioned from the long-term profitable management of trees, wildlife, and recreational facilities by professional

foresters, to costly passive management of "critical habitat" by wildlife biologists and computer modelers. Tax-producing loggers and tree planters have largely been replaced by taxpayer-funded agency "ologists," their university modelers, and seasonal wildfire fighters in the process.



Jerry Phillips' map of the 1868 Coos Fire in relation to present-day Elliott State Forest. This area reburned in 1879, creating the "Big Burn" homesteaded by the Goulds in 1884.

This transition took place slowly at first, beginning in the 1960s and creation of the Wilderness Act and the National Environmental Policy Act (NEPA); accelerated in the 1980s with invention of ESA "Habitat Conservation Plans" (HCPs) and the development of taxpayer funded lawsuits made possible by the Equal Access to Justice Act (EAJA); and then was almost entirely completed on federal lands in 1994 with the adoption of the Clinton Administration's Northwest Forests (NWFP). Federal access to, and control of, HCPs on state, private, and tribal lands remains a work in progress [see Graph].

From 1952 until 1987 -- also 35 years -- there was only one forest fire more than 10,000 acres in western Oregon, the 1966 43,000-acre Oxbow Fire. Since 1987 there have been at least 36 such fires, with at least eight being more than 100,000 acres. Almost all these fires have taken place on federal lands designated as Wilderness or regulated as NWFP-created "LSRs" (Late-Successional Reserves), "AMRs" (Adaptive Management Reserves), arbitrary streamside buffers ("Riparian Reserves") and other "Congressionally Reserved Areas" -- all now managed and influenced, in large part, by USFWS and NMFS regulations for "critical habitat."

As the federal government continues the transition from actively managing its roads and forestlands for timber production and recreation to passively managing them for hypothetical habitat requirements of select species, the incidences of large- and catastrophic-scale wildfires have increased 3,600%!

This predictable result was made possible in large part by an endless string of anti-logging lawsuits initiated by a small number of nonprofit environmental organizations.

The Center for Biological Diversity (CBD), Portland Audubon, Cascadia Wildlands, and a few others -- with expensive legal teams often unknowingly funded by taxpayers via the EAJA -- have regularly used ESA listings of spotted owls, marbled murrelets, and coho as surrogates to greatly reduce active management of our public forests. Complex NEPA procedures are often the basis for these "successful" filings, and deadly wildfires have often followed. As predicted.

HCPs and The Elliott

I have been writing about forestry, wildfire, and wildlife issues on a regular basis for *Oregon Fish & Wildlife Journal* for more than 10 years. My previous article in this series regarded the life and career of long-time Elliott State Forest manager, Jerry Phillips. The Elliott history chart at the beginning of this article was also used to illustrate Jerry's great success during his career on the Elliott from 1954 to 1989.

The Elliott was Oregon's first state forest. It was established in 1930 by trading about 70,000 acres of the Siuslaw National Forest located south of the Umpqua River for Common School Fund properties of similar value that were scattered around the State. Previous articles in this series have looked closely at the history of the Elliott and of Oregon's Common School Fund -- which has been managed by law since 1859 for the benefit of Oregon schools by the State Land Board (SLB), composed of the Governor, State Treasurer, and Secretary of the State.

In 1930 the Elliott was mostly covered with young Douglas fir and red alder trees that had seeded in following the catastrophic 1879 "Big Burn" wildfire and several subsequent decades of livestock grazing, firewood gathering, logging, and clearing fires by the Gould's, McClay's, and others who had settled in the area.



Elkhorn Ranch, ca. 1894. The Gould family homestead was established near the center of the 1930 Elliott Forest and 1879 "Big Burn" reburned snags from ca. 1775 and 1868 wildfires.

In 1955 the Oregon legislature gave the Oregon Department of Forestry (ODF) the responsibility to manage the Elliott more actively as its young timber was growing to merchantable size. The first major logging sale on the Elliott was a stand of mostly 200-year-old Douglas fir on North Marlow Ridge [point A on the graph] in 1959, one of the few stands within the Elliott of that age group and market value.

Then, on October 12, 1962, everything changed. The Columbus Day Storm [point B] swept over the Elliott without warning. Winds exceeding 150 miles-per-hour blew down 100 million board feet (mmbf) of 70-year-old second-growth timber in a matter of hours. The next several years were devoted to building more than 200 miles of road needed to reach 250 areas filled with toppled "blow-down" -- dead trees that had to be harvested while they still had value and before being infested with beetles or rot. The graph tracks the subsequent annual increases and decreases in harvesting between 1963 and the present. Note the impacts of the 1973 [C] and 1980 [D] recessions on harvest volumes.

In 1988, the Elliott adopted a long-term annual harvest plan average of 50 mmbf, based on the Forest's continued growth and Jerry's continuing success managing natural and human events affecting its development. He retired in 1989, as spotted owls were first being discovered on the Forest, and the year after that -- 1990 -- the federal government listed the northern spotted owl ("NSO") as an ESA "threatened species" and the Elliott's 1988 harvest plan [E] was shelved that quick (PDQ).

Two years later, in 1992, the marbled murrelet was also listed [F]. Marbled murrelets are birds that spend their entire lives at sea, mostly offshore from Alaska. They can fly more than 60 miles-per-hour and only come ashore some years in early summer to lay a single egg. Small populations of this bird also live in the ocean offshore from Oregon, Washington, and California and occasionally nest on large lateral limbs of Douglas fir, redwood, hemlock, spruce, or bigleaf maple. Adults gather fish daily from the ocean on a high-speed beeline to feed a hatchling until it becomes a fledgling and can fly after four or five weeks -- at which time it immediately also makes a beeline for the ocean, never to return to its nest.

Then, in 1995, spotted owl and marbled murrelet HCPs were developed by the USFWS and adopted by the SLB and ODF for the management of the Elliott [G]. In 1996, coho salmon were also given federal listing [H]. These three animals, spotted owls, marbled murrelets, and coho, have been the basis for most ESA lawsuits filed to stop active management on western Oregon forestlands ever since.

The marbled murrelet HCP expired in 2001 [I] and in 2011 [J] ODF completed its new Elliott Forest Plan, calling for an annual harvest of 40 mmbf -- well below the conservative 1988 plan, but significantly greater than the average harvest since the spotted owl was first listed in 1990.

The following year, 2012 [K], a coalition of environmental groups -- Portland’s Audubon Society, Eugene’s Cascadia Wildlands, and Tucson, Arizona’s CBD -- sued the State of Oregon, alleging that the new Elliott plan was illegal. Logging jobs on 28 active sales in State forests were immediately halted as one result.

Rather than contest the court’s ruling, the Governor and SLB decided to sell the Elliott at a fraction of its pre-ESA value instead. When this sale was ruled illegal, they transferred ownership to OSU for research purposes, terminating ODF’s decades-long management role in 2017 [L]. When this transfer was also ruled illegal, the 2022 Oregon State legislature voted to rename the Elliott as the "Elliott State Research Forest" (ESRF), with OSU responsible for its management.

Currently, remaining tasks for the SLB are to "decouple" the Elliott from its legal obligations to the Common School Fund, to develop a new federal HCP, for OSU to develop a functional operating plan, and to locate funding needed to begin proposed research operations.

The current document “puts the cart before the horse” by proposing a major experiment before conducting such an analysis and without developing on-the-ground familiarity with the property. In addition, the experiment OSU has proposed is badly flawed, compromises development of the long-term research potential of the forest and lacks significant relevance to management of Oregon’s forests. The proposed experiment violates basic principles essential to production of statistically valid and socially convincing outcomes. Furthermore, the focus on Triad, an academic concept related to land allocations at regional scales, has no relevance to pressing forestry issues facing Oregonians. -- Jerry Franklin and Norm Johnson, November 28, 2020, review of proposed OSU research and management plan for the Elliott

In 1994, John Beuter, OSU Forestry economist, was hired by the BOF to do an economic analysis of the Elliott -- which, despite its new spotted owl status, could still boast 80,000+ forested acres, 2.5+ billion feet of merchantable timber, 550 miles of rocky access roads, and many miles of prime salmon and trout streams. Given recent ODF management history and 1994 ESA restrictions, Beuter concluded: *"Selling the Elliott is the only marketing alternative likely to significantly increase net annual income to the CSF [Common School Fund]."* Fifteen years later, in 2009, John Charles, Cascade Policy Institute President and CEO, testified:

"Unfortunately, this recommendation has been consistently ignored by the SLB. Had it been followed in 1995, the CSF today would be worth at least \$3 billion, even *after* the market declines of 2008. Instead, it is only worth about \$1 billion. Even by the standards of legislative appropriations, one would think that \$2 billion in lost asset value for school funding is something to be concerned about."

Following the 2012 environmental lawsuit, the Elliott began losing millions of Common School Fund dollars annually to legal costs, and by 2016 its value had deteriorated to an estimated \$220.8 million -- a number determined by Roger Lord, senior appraiser of Mason, Bruce & Girard (MB&G), at the direction of the SLB and developed specifically for the purpose of selling the Forest. This number represented the synthesis of three separate independent Elliott appraisals that had varied from only \$192 million to \$262 million.

This contracted value was premised on the sale being to the private sector with primary legal constraints to future management being limited only by the Oregon Forest Practices Act (OFPA) and state and federal ESAs. The Common School Fund would somehow be "decoupled" by this sale which, curiously, was not allowed to be even a penny more than \$220.8 million. As stated, the sale to a single bidder (of 50 solicited) was ruled illegal and voided.

In 2017, Oregon State Senator Ted Ferrioli requested that Wayne Giesy and I develop an independent forest management plan for the Elliott that accommodated wildlife habitat requirements while maintaining regular employment for rural workers and continuing to make payments to the Common School Fund. Wayne met several additional times with Senator Ferrioli and had at least two personal meetings with Governor Kate Brown to discuss this proposal.

The resulting "Giesy Plan Alternative" was publicly delivered as requested and has been described in some detail in earlier articles in this series. In part, it adopted the conservative 1988 standard of 50 mmbf/year average annual harvest for an initial 20-year research period. This amount is only about 2/3 of the annual growth of the Elliott and less than 2% of the Forests' estimated 2.5+ billion feet of standing timber, so more volume in older trees of greater value -- dollar and habitat -- would have existed by the end of this two-decade experiment.

At Senator Ferrioli's request, Christine Broniak, then Economist for the Oregon Legislative Revenue Office, estimated potential Common School Fund income based on a 50 mmbf/year average harvest. She used sales prices of Elliott timber for the previous three years of

\$367.50/mmbf and the "Producer Price Index" to estimate an annual School income of \$23 million, or \$460 million total for Oregon schools over the proposed 20-year research period.

According to Broniak's math, Oregon schools have hypothetically lost more than \$100 million potential income since 2017, and several hundreds of millions more if these numbers are considered for the entire period from 1990. And, despite being publicly and privately requested by the Governor, the Giesy Plan Alternative proposal has never been openly discussed or considered by SLB, Department of State Lands (DSL), or OSU.

Also in 2017, ODF Forestry Division Chief Liz Dent provided a "conservative estimate of 8.8 direct and indirect jobs for every million feet of harvest" at a public meeting of the SLB. Using that multiplier, the loss of 50 mmbf in timber sales also resulted in the loss of 440 needed rural -- and taxpaying -- jobs when Elliott sales were ended.

In 2022, Lord reduced the MB&G evaluation of the Elliott even more, down to only \$99 million! In an August 29 public letter to Geoff Huntington -- now with DSL rather than OSU -- the reasons given for this devaluation were based on the "Market Value" appraisal method used in 2016 vs. the "Investment Value" appraisal method being used 2022.

The principal reasons for this further devaluation of the Elliott were given as: 1) less acreage available for timber production and 2) less intensive harvesting of those reduced acreages, resulting in 3) lower annual harvest volumes produced at greater costs. Not a good investment. Worth \$99 million at most.

HCPs and Oregon Taxpayers

In addition to the never-ending Elliott HCP process, two other major HCP projects are currently taking place in western Oregon -- one for the remaining State Forests still being managed by ODF, and another for the 10 million forested acres owned by private landowners.

Beginning in 2019, Governor Brown organized and convened a select number of environmental organizations, forest landowners, and timber industry representatives in a series of backroom meetings to develop a "Private Forest Accord" (PFA). This "agreement" would pay landowners money in the form of tax credits instead of logging and reforesting their lands -- and producing jobs and tax revenues -- as they otherwise legally and currently do.



Top Left: Ground Fuels. Top Right: Ladder Fuels. Bottom: Crown Fuels.
Photographs by McKenzie Peters, NW Maps Co., Mt. Thielsen Trail, August 23, 2020.

According to the *Oregon Wild* website (September 21, 2022):

"Ever since the Private Forest Accord agreement between Oregon Wild, our conservation allies, and the logging industry was announced in late October 2021, we've been trying to think of ways to describe the magnitude of the changes that are coming to Oregon's private forest laws. Much like the adoption of the Northwest Forest Plan, the passage of the Private Forest Accord does not mean that all issues related to private lands logging are settled. There is still more for communities, Oregon Wild, our partners, and the logging industry to do."

In other words, in addition to devaluing the private properties and putting more people out of work, and having unwitting taxpayers cover the loss in profits with "tax credits" -- the environmental community is also assuming there is "still more . . . to do." Best guess is that lawyers are expected to be involved.

By these general methods, politicians, government bureaucrats, university modelers, and environmental lawyers -- through ESA, NEPA, EAJA, ETC -- have taken almost complete control of our federal forests since 1990. And now they are using USFW and NMFS to gain similar legal access and direct control over private, state, county, and tribal roads, streams, and forestlands. If successful, further rural physical and economic damage and increased severity and extent of local wildfires and directly related losses of homes and wildlife are predicted.

HCPs and ODF

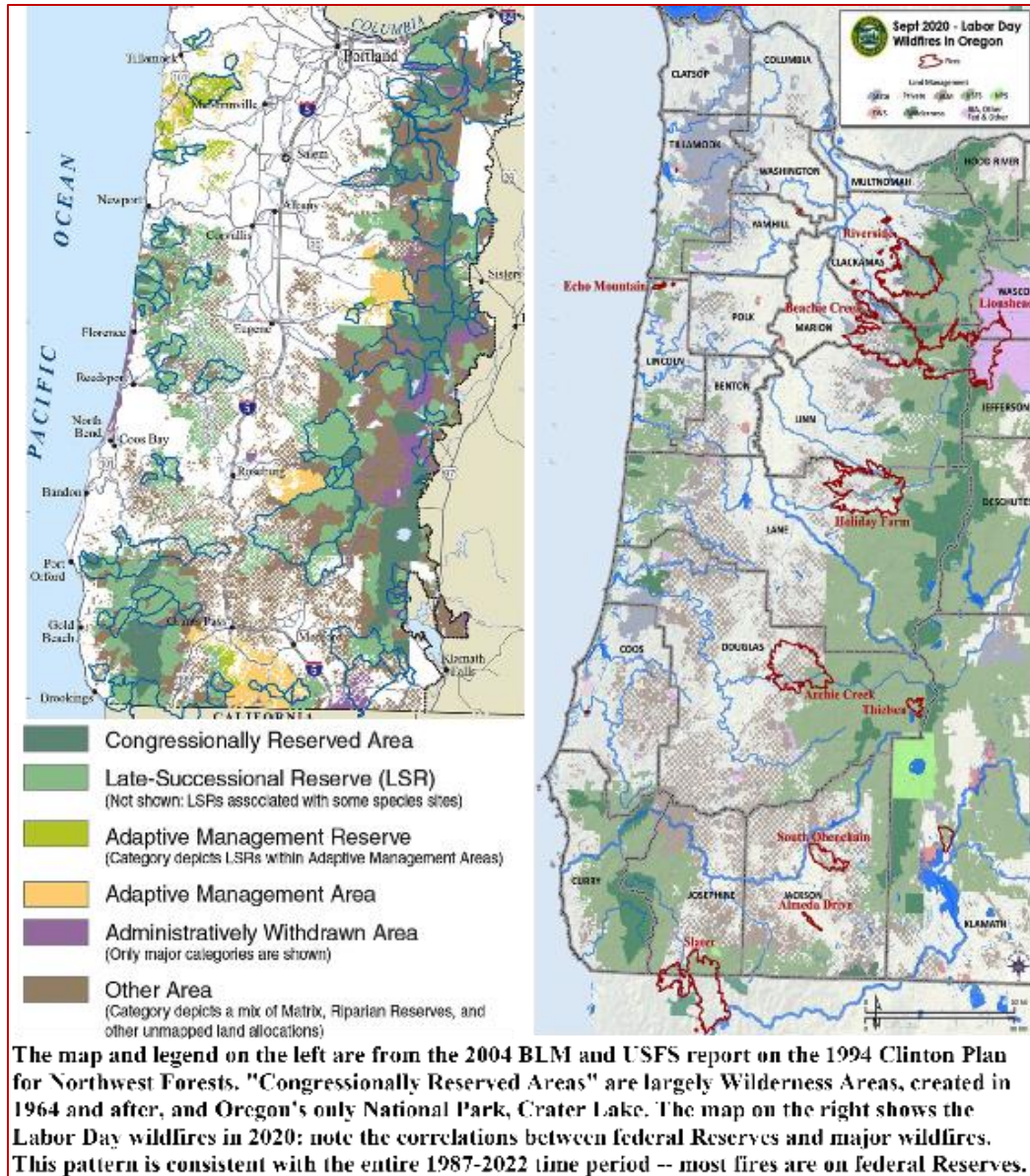
In November 2018, the Oregon Board of Forestry (BOF) directed staff to develop an HCP for 17 federally listed species: spotted owls, marbled murrelets, 10 fish (including three separate runs of coho), three salamanders, martens, and the infamous red tree vole. This long-term plan would cover about 640,000 acres of ODF-managed land west of the Cascades, not including the Elliott. If the HCP is approved by USFWS and NOAA, ODF would be assured ESA compliance -- and direct federal access and control -- for 70 years.

For this HCP, "Spotted Owl Habitat" is defined as "includes modeled nesting, roosting, and foraging habitat," and marbled murrelet habitat "includes modeled suitable and highly suitable habitat." Note that these are not scientific documentation of actual birds or habitat -- they are computer "models" of someone's unstated biases and assumptions: "if you build it, they will come."

Who, exactly, is determining "suitability" for these imaginary birds? And how? The only "accountability" we get for these printouts is that they are "peer reviewed" by "experts." That's not how science works, and it is certainly not how successful resource management has ever been performed. These are nameless people paid by taxpayers to "model" the directions of committees comprised of professional "experts" and government bureaucrats. What could go wrong?

And the result is a mapping of 275,000 acres of the 640,000 as "critical habitat," with another 164,000 acres of modeled "nesting, roosting and foraging habitat" to be created over the course of the 70-year agreement, meaning that a total of 439,000 -- or 70% -- of our State Forests would be removed from production and put into the hands of federal managers during all of that time.

My concerns with HCPs are: 1) they give federal access and control to private and state lands for decades; 2) they are expensive and costs taxpayers significant money, instead of generating tax revenues; and 3) these government "critical reserves" have a predictable habit of ending in wildfire and killing millions of wildlife supposedly being "protected."



LSRs and the Clinton Plan

According to *Wikipedia* (September 19, 2022), the stated purpose of the Endangered Species Act is to protect species and "the ecosystems upon which they depend." The detailed entry contains significant links to CBD and other environmental organizations and writings and makes the following claims:

"About one million species worldwide are currently threatened with extinction. North America alone has lost 3 billion birds since 1970. These significant population declines are a precursor to extinction. Half a million species do not have enough habitat for long-term survival. These species are likely to go extinct in the next few decades without habitat restoration."

"As of January 2019, there are 1,467 total (foreign and domestic) species on the threatened and endangered lists. However, many species have become extinct while on the candidate list or otherwise under consideration for listing. A 2019 report found that FWS faces a backlog of more than 500 species that have been determined to potentially warrant protection."

Certainly, *Wikipedia* is not an entirely credible source, and some of these statements can be debated, including a general definition of "ecosystem." Instead, ecosystem dependency is defined as: "the present or threatened destruction, modification, or curtailment of its habitat or range" -- apparently a problem of "destroying" or even "modifying" habitat of a species with a known "range."

So now we enter the concept of "critical habitat," which is literally defined as "a habitat area essential to the conservation of a listed species, though the area need not actually be occupied by the species at the time it is designated." In other words, actual occupancy of an area supposedly critical to stop the extinction of a named animal, isn't necessary! A computer model can do the job just fine:

Critical habitat must be designated for all threatened and endangered species, under the Endangered Species Act, with certain specified exceptions. Designations of critical habitats must be based on the "best scientific information available" [BAS, really] and in an open public process within specific timeframes. Unless deemed necessary for the species' continued existence, critical habitat do not include the entire geographical area occupied by a species.

To meet this monumental requirement, the Clinton Plan invented the concept of Late-Successional Reserves in order is "to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth related species including the northern spotted owl."



October 2020 unthinned, roadside forest stand on BLM land on Thunder Mountain following Archie Creek Fire. Photo by Matt Hill, Douglas Timber Operators (DTO).



October 2020 photo depicts adjacent roadside stand on BLM land that was thinned and pruned according to prescription, ca. 2015. Photo by Matt Hill, DTO.

With millions of species apparently facing extinction and waiting to be listed, there was only so much "critical habitat" research time and expertise available, so LSRs and other reserves were created over vast areas of our public forests to account for them all. President Clinton was regularly quoted as thinking the NWFP would put an end to the Northwest "timber wars" -- but

extensive regulations and litigation continued as before, largely unknowingly paid for by US taxpayers through untaxed environmental organizations and their legal staffs funded by the EAJA.

Professional predictions that these massive reserves, including Wilderness Areas, LSRs, and streamside buffers would eventually turn into fire bombs and/or be lost to flooding, landslides, windstorms, bugs, or disease were ignored, and generally remain unacknowledged to this time. Instead, we get "climate crisis" excuses, WUI acronyms, and massive preventable wildfires almost every year now. We can do better, and have in the past. These are not new problems, they are self-inflicted, and they can be fixed. If there is a will to do so.

Conclusions

There is no evidence that HCPs have had any positive effect on targeted spotted owl, marbled murrelet, or coho populations in western Oregon over the past 35 years.

There is documented proof that the adoption of passive approaches to forest management greatly increases accumulations of ground fuels, ladder fuels, and canopy closures, and thereby lead to greater likelihoods of deadly major- and catastrophic-scale wildfires.

Attempts to affect targeted wildlife species by creating Wilderness Areas, Riparian Reserves, LSRs, HCPs and computerized "critical habitat" models in western Oregon during the past 35 years have been at a great cost of billions of dollars, tens of thousands of lost rural jobs, hundreds of thousands of burned forest acreages, thousands of lost homes, millions of killed wildlife, extended episodes of major air and water pollution, and losses of human life.

There is no evidence that these massive investments have resulted in a single additional owl, murrelet, or salmon.

Appendix A.26. Proposed Legislation Promoting Forest Management [S.4904]

Note: Senator Joe Manchin (D-West Virginia) and Senator John Barrasso (R-Wyoming) are the respective Chair and Ranking Member of the Senate Energy and Natural Resources Committee. They recently introduced the Promoting Effective Management Act of 2022 [S.4904] that directs the Forest Service and the Bureau of Land Management (BLM) to utilize existing tools and resources to dramatically increase wildfire mitigation projects on National Forests and public lands, and to be transparent with the public about progress made.²⁰⁹

Promoting Effective Forest Management Act of 2022 Section-By-Section Summary

TITLE I – ACCOMPLISHMENTS OVER RHETORIC

Section 101. Thinning Targets.

Section 101 directs the Forest Service and the Bureau of Land Management (BLM) to set annual acreage targets for mechanical thinning projects on National Forests and public lands. Under the bill, agencies are to double their acreage targets by 2025 and quadruple them by 2027.

Section 102. Annual Reports.

Section 102 directs the Forest Service and BLM to report certain acreage accomplishments, including whether the mechanical thinning targets in Section 101 have been met. If the targets are not met, the agencies must report any limitations or challenges, including litigation or permitting delays that hindered their progress.

Section 103. Transparency in Fire Mitigation Reporting.

Section 103 increases transparency in fire mitigation reporting by directing the Forest Service and BLM to exclude acres that need to be treated more than once from output measures in certain reports and budget request documents.

Section 104. Regional Forest Carbon Accounting.

Section 104 directs the Forest Service to, using data from the forest inventory and analysis program, determine whether National Forest System lands are carbon sources or carbon sinks, and to publish that information online.

Section 105. Targets for Wildlife Habitat Improvement.

Section 105 directs the Forest Service and BLM to meet wildlife habitat improvement goals and targets relative to existing management plans.

TITLE II – FOREST MANAGEMENT

Section 201. Land and Resource Management Plans.

Section 201 directs the Government Accountability Office (GAO) to report on whether shortening the length and development timelines of Forest Service land and resource management plans would help the agency address its backlog of out-of-date plans.

Section 202. Management of Old Growth and Mature Forests.

Section 202 directs the Forest Service and BLM to adhere to the current definitions of “old growth forest,” and requires that any updates or revisions can only be made after a recommendation by a scientific committee, followed by a rulemaking process under the Administrative Procedure Act. Further, this section clarifies that “mature forests” are separate from old-growth forests, and that mature forests are to be managed according to current law. This section also clarifies that executive branch actions shall not modify, amend, or otherwise change the duties of the Forest Service or BLM under current law.

Section 203. Assessment of Processed-based Restoration Techniques.

Section 203 directs the Forest Service and the United States Geological Survey (USGS) to establish a pilot program to conduct research on and evaluate wetland and riparian restoration techniques, including utilizing biologically-driven restoration.

Section 204. Intervenor Status.

Section 204 allows counties and local governments to intervene in lawsuits intended to stop wildfire prevention projects on nearby National Forests.

Section 205. Utilizing Grazing for Wildfire Prevention.

Section 205 directs the Forest Service and BLM to develop a strategy to increase the use of grazing as a wildfire mitigation tool. This includes the use of targeted grazing, increasing issuances of temporary grazing permits, and completing environmental reviews for vacant grazing allotments that could be used for grazing when drought and fires impact occupied allotments.

TITLE III—WORKFORCE

Section 301. Logging workforce.

Section 301 directs the Forest Service to work with States to develop a universal, tiered program to train people to enter the logging workforce, and to examine ways to facilitate apprenticeship training opportunities. This section also allows existing funding to be used for low-interest loans to modernize logging machinery.

Section 302. Break-in-service consideration for firefighter retirements.

Section 302 ensures that wildland firefighters can retain employment and retirement benefits for breaks-in-service that are 9 months or less.

Section 303. Firefighter rental housing.

Section 303 places a cap on rent for wildland firefighters when they are forced to pay for agency-provided housing.

TITLE IV—CULTURAL CHANGE IN AGENCIES

Section 401. Mandatory use of existing authorities.

Section 401 requires each National Forest and BLM unit to use at least one existing streamlined authority for environmental review on a forest management project within the next three years.

Section 402. Curtailing employee relocations.

Section 402 directs the Forest Service to curtail employee relocations and to develop a program that provides incentives for employees to grow in place. Further, this section places a cap on employee relocation expenses, and directs the Secretary to solicit employee applications in a manner that does not limit eligibility to current Forest Service employees.

Section 403. Repeal of FLAME reports.

Section 403 repeals a report within the FLAME Act of 2009.

Appendix A.27. Wildland Fire Mitigation and Management Commission and Selected Thoughts

In December 2021, the Departments of Agriculture, the Interior and Homeland Security -- through the Federal Emergency Management Agency (FEMA) -- announced the formation [Wildland Fire Mitigation and Management Commission](#). The commission is tasked with forming federal policy recommendations and strategies on ways to better prevent, manage, suppress and recover from wildfires, and provide recommendations for aerial firefighting equipment needs.

This Commission is important and can make a difference. In future updates of *A Call to Action*, instructional comments will be posted [as Appendices] in the hope the [Commission Members](#) will be better informed. The following is a first post by Nancy O. Geehan.²¹⁰

Thank you for asking for our thoughts and ideas. My thoughts are based on nearly three years of policy focus on how to make some difference in re-engaging the American people and their County and other local governments in natural resources and environmental management policy.

In this case, I offer that we must counter with County and Grassroots requests for the Agency to stop working outside of their mandated policymaking process. These requests need to be made in a non- biased but firmly consistent manner with the [NACo Resolution](#) turned talking points for individual requests and a consistent letter for counties to submit.

Counties cannot implement the resolution — the Forest Service must initiate policymaking for any input to mean anything. At this point without this process no administrative appeals to burning and/ or county requests for info or opposition to prescribed burns or technical suppression intentions matter. The efforts of many counties to try to do so have confused the public and continued a myopic local debate about fire management and not wishing to be contrary with local and fine National Forest Management staff.

We must raise the bar on the Forest Service Washington leadership team and Departmental politics to avoid initiating their own policy making process that would not allow such circumvention of every natural resource and management technology and relationships with people and their local communities.

It is time to bring the USDA Forest Service [and USDI BLM, etc.] back to the people that they serve ... not special interests that have usurped the leadership of all science based and interdisciplinary management to destroy versus actively conserve through management of our vital watersheds and all of the resources they contain.

Our federal management agencies have become focused on blocking all public access to our public lands and resources with their strategies and guidelines to encroach upon all state and private lands. Our local economies and vital relationships with federal lands are of no concern to the politically driven and out of control federal lack of accountability to their Congressional authorities and mandates.

It is time for the follow through on the [NACo Resolution](#) to request Senate Energy and Nat Resources Committee Hearings to rein in the rogue 10-year wildland fire “strategy” and the “prescribed fire guidelines.” These are not binding policy without rulemaking, public involvement and human/environmental impact analysis.

We must insist on Hearings on these rogue actions. We must take courage in the face of such openly destructive actions. Forest Service normal and customary policymaking with Legal and Legislative action in sync as the American people get the ball rolling with forcing the rules back in place. We can no longer tolerate others without discipline or concern telling us that burning is the solution.

We are not against fire as a tool in management of healthy well managed public lands and resources. We do not condone a rogue and flat-out wrong approach in using only fire to make up for years of politically driven restrictions in interdisciplinary management of all natural resources. Recreation and all resource management make for the sanity of “caring for the land and serving people”.

In the language of Legitimate Forest Management alternatives, scoping involves you and me in transparent input into overall resource management. We have been barred from this process by NOT having the policymaking commence.

The Forest Service is NOT going to initiate Policymaking per the NACo Resolution without the Senate Energy and Natural Resources Committee calling them out and forcing the Agencies back to following existing Congressional mandates. Simultaneously, we should be asking for a freeze on funding for this “training” and for a reprogramming of Infrastructure Act funding of this and the companion “Commission “. Appropriated funds in this 3-billion-dollar boom to the budgets of USDA and USDI agencies should be reprogrammed to on the ground active management where the real crisis in American natural resources management resides.

Thank you all for listening to this input. It is good to have this fine group of people as colleagues in our Great Cause. This Nation’s vital natural resources and the American People are so worth this effort.

Appendix A.28. An Analysis of Division O, Wildfire Suppression Funding and Forest Management Activities

2018 Consolidated Appropriations Act, Public Law 115-141

H. R. 1625—712

AN ANALYSIS OF DIVISION O

WILDFIRE SUPPRESSION FUNDING AND FOREST MANAGEMENT ACTIVITIES ACT²¹¹

TITLE I—WILDFIRE AND DISASTER FUNDING ADJUSTMENT

TITLE II—FOREST MANAGEMENT ACTIVITIES

(This Title at Section 201 describes forest management activities and does not include wildfire use)

TITLE I—Section 101 is the “Short Title “...and may be cited as the “Wildfire Suppression Funding and Forest Management Act”

Section 102 is the “Wildfire and Disaster Funding Adjustment” section. Subsection (a) amends the Section 251 (b)(2) of the Balanced Budget and Emergency Deficit Control Act of 1985 in (1) subparagraph (D)(i)(2)(D)(ii) and adds (3) Subparagraph (F) Wildfire Suppression. The purpose of which is to add additional budget authority for fiscal years 2020 through 2027.

When interpreting Federal law, the United States Government Accountability Office (GAO) through their Office of General Counsel (OGC) has published “Principals of Federal Appropriations Law” (“Red Book”) in several chapters²¹². Chapter 1 – Introduction advises how to determine Congressional intent with the “**Plain Meaning**” Rule.

Every appropriation contains limitations upon its availability; that is, federal agencies may spend appropriated amounts only in accordance with the conditions that Congress has placed upon the appropriation. These conditions may be classified in three ways: purpose, time, and amount. For an example, examine the following appropriation for the Marshals Service for fiscal year 2015:

“For necessary expenses of the United States Marshals Service,

\$1,195,000,000, of which not to exceed \$6,000 shall be available for official reception and representation expenses, and not to exceed \$15,000,000 shall remain available until expended.”

This language specifies purpose limitations: about \$1.2 billion is available for the “necessary expenses” of the Marshals Service, while no more than 6,000 of that amount is available “for official reception and representation expenses.” This language places limits upon the permissible objects for which these funds may be used: the money is available only for the necessary expenses of the Marshals Service and not for, say, the Internal Revenue Service.

An appropriation can be made only by means of a statute. In addition to providing funds, the typical appropriation act includes a variety of general provisions. Anyone who works with appropriations matters will also have frequent need to consult authorizing and program legislation. It should thus be apparent that the interpretation of statutes is of critical importance to appropriations law.

Authorizing Legislation

Organic act of 1897 [public--no.2.] established forest reserves from the Public Domain for the purpose “...of improve[ing] and protect[ing] the forest within the reservation, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States; but it is not the purpose or intent of these provisions, or of the Act providing for such reservations, to authorize the inclusion therein of lands more valuable for the mineral therein, or for agricultural purposes, than for forest purposes.” Further “*The Secretary of the Interior shall make provisions for the protection against destruction by fire and depredations upon the public forests and forest reservations which may have been set aside or which may be hereafter set aside under said Act of March third, eighteen hundred and ninety-one, and which may be continued; and he may make such rules and regulations and establish such service as will insure the objects of such reservations, namely, to regulate their occupancy and use and to preserve the forests thereon from destruction; and any violation of the provisions of this Act or such rules and regulations shall be punished as is provided for in the Act of June fourth, eighteen hundred and eighty-eight of the Revised Statutes of the United States.*”

The Multiple Use Sustained Yield Act of 1960 declared that the purposes of the national forest include outdoor recreation, range, timber, watershed and fish and wildlife. The Act directs the Secretary of Agriculture to administer national forest renewable surface resources for multiple use and sustained yield. The policy of Congress is that national forests are established and administered for outdoor recreation, range, timber, watershed, and fish and wildlife purposes. This Act is intended to supplement these purposes.

National Forest Management Act Of 1976 reorganized, expanded and otherwise amended the Forest and Rangeland Renewable Resources Planning Act of 1974, which called for the management of renewable resources on national forest lands. The National Forest Management Act requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use, sustained-yield principles, and implement a resource management plan for each unit of the National Forest System. It is the primary statute governing the administration of national forests.

It is clear from the original authorizing legislation, the Organic Act and the subsequent cornerstones of the Multiple Use and Sustained Yield Act and the National Forest Management Act, Congress intended the protection, multiple uses and sustained yield principles for the Nation’s national forest. Thus, through these authorizing acts Congress expects that threats such as wildfire to the Nation’s national forest be suppressed.

Appropriations Law

Starting with Wildfire Suppression which appears in the Division Title and the “Short Title.” What does Congress mean by suppression? Congress intends by the appropriation language to ensure ***a policy directed at putting out all wildfires as rapidly as possible.***

*By far the most important rule of statutory construction is this: You start with the language of the statute. Countless Supreme Court decisions reiterate this rule. E.g., Sebelius v. Cloer, U.S., 133 S. Ct. 1886, 1893 (2013); Carcieri v. Salazar, 555 U.S. 379 (2009); BedRoc Limited, LLC v. United States, 541 U.S. 176 (2004); Lamie v. United States Trustee, 540 U.S. 526 (2004); Hartford Underwriters Insurance Co. v. Union Planters Bank, N.A., 530 U.S. 1 (2000); Robinson v. Shell Oil Co., 519 U.S. 337 (1997); Connecticut National Bank v. Germain, 503 U.S. 249 (1992); and Mallard v. United States District Court for the Southern District of Iowa, 490 U.S. 296, 300 (1989). **The primary vehicle for Congress to express its intent is the words it enacts into law.** As stated in an early Supreme Court decision:*

“The law as it passed is the will of the majority of both houses, and the only mode in which that will is spoken is in the act itself; and we must gather their intention from the language there used.”

If the meaning is clear from the language of the statute, there is no need to resort to legislative history or any other extraneous source. As the Supreme Court observed in Connecticut National Bank v. Germain:

“[I]n interpreting a statute a court should always turn first to one, cardinal canon before all others. We have stated time and again that courts must presume that a legislature says in a statute what it means and means in a statute what it says there. When the words of a statute are unambiguous, then, this first canon is also the last: judicial inquiry is complete.”

This is the **“Plain Meaning”** rule with respect to Wildfire Suppression.

Division O clearly and unambiguously directs the USDA Forest Service (FS) and the land management agencies of the Department of the Interior and the subsidiary State and Territorial forestry agencies to suppress wildfires.

But in reality, what happens in wildfire suppression response by the FS? The current Forest Service Manual (FSM) 5100 - Fire Management Chapter 5130 - Wildfire Response²¹³ at paragraphs 5, 6, and 7 state:

5. *Initial response actions are based on **policy** and **Land and Resource Management Plan** objectives, with consideration for prevailing and anticipated environmental conditions that can affect the ability to accomplish those objectives.*

6. *Threats to property and natural resources will be identified and every wildfire will establish objectives that seek to mitigate these threats when time, resources, and prevailing conditions allow for action without undue risk to human life.*

7. *All or a portion of a wildfire originating from a natural ignition may be managed to achieve **Land and Resource Management Plan** objectives when initial and long-term risk is within acceptable limits as described in the risk assessment.*

At the time, Interim Chief. Vicky Christiansen’s Leaders Intent Memo²¹⁴ for 2018 provided direction to her agency staff on her expectations for wildfire suppression. In the memo, the Interim Chief referred to “...*windows of opportunity in accordance with our Federal Wildland Fire Management Policy, to reinstate ‘the role of fire as an essential ecological process and natural change agent’ by using both planned and unplanned ignitions ‘to restore or maintain the natural fire regime where safe and possible.’*” Her expectation was to use the “**decision support process in evaluating the potential for using fire under conditions where it can be done safely and effectively.**”

So, nowhere does the Interim Chief’s Leader’s Intent, and/or the agency manual system direct agency personnel to suppress the wildfire, notwithstanding the wording in Division O -- **Wildfire Suppression**. This is evident on-the-ground in the case of the Pole Creek Fire which occurred on the Uinta/Wasatch-Cache National Forest in 2018.

The Facilitated Learning Analysis (FLA)²¹⁵ of the Pole Creek/Bald Mountain Fire prepared by the Uinta/Wasatch-Cache National Forest provides a “road map” for flouting appropriations law.

*“The Forest embraces opportunities to allow **unplanned fires to reduce fuel accumulations and contribute to landscape sustainability** where and when conditions are right to do so with little risk. The intent is for the Forest to communicate this every spring at meetings with neighbors and partners. Each year, Forests improve their outreach to partners to attend these spring meetings, including the UWF. At the meetings, a map showing areas in which fire starts might be considered as a means to meet Forest Plan objectives is shared and discussed. These maps can be amended where appropriate based on these spring conversations. The map is referred to as “The Red/Green Map” (Default Initial Fire Response Map) and is required for each Forest in the Intermountain Region as a consistent means to communicate intent and opportunity. An area marked in red indicates where fire is likely unwanted due to adjacent values. A green area might be evaluated for an approach that would lead to a larger fire footprint. The value of the Red/Green map is in the conversation with partners pre-season.”*

Conclusion

The use of appropriated suppression funding for “*using fire under conditions where it can be done safely and effectively*” or “*unplanned ignition*” or when “*wildfire originating from a natural ignition may be managed to achieve Land and Resource Management Plan objectives*” violates appropriation law because the agency Interim Chief’s “leader intent” and her agency’s action in implementing the appropriation and the policy stated in the FSM does not align with the appropriation law as enacted. The enacted law states **Wildfire Suppression**. Suppression is in the Division Title as well as the Short Title and in the Amendment to the Balanced Budget and Emergency Deficit Control Act of 1985 at a new section (F) **Wildfire Suppression**.

The Forest Service is in violation of the appropriation law for **Wildfire Suppression** by failing to accomplish the intent of the appropriation. The test is the extent to which the expenditure will contribute to accomplishing the purposes of the appropriation the agency wishes to charge. In this wildfire Pole Creek/Bald Mountain Fire and similar wildfires in FY 2018, the agency chose to “manage” the wildfire to achieve objectives pursuant to policy and strategy i.e., the *Federal Wildland Fire Management Policy* and/or “*the goals of the National Cohesive Wildland Fire Management Strategy to use fire where we can and — as a nation — learn to live with wildland fire*” and are not referenced in Division O. The several national forest land and resource management plans which are derivatives of the National Forest Management Act are not specified in Division O of the Consolidated Appropriations Act of 2018-PL – 115 – 141 – 132 with its associated amendment of the Balanced Budget and Emergency Deficit Control Act of 1985.

This paper has verified the established “plain meaning rule” of the appropriation language. Further Wildfire Suppression appropriation language in the enacted law calls for Wildfire Suppression Operations which means the emergency and unpredictable aspects of wildland firefighting including support, response, emergency stabilization and other emergency activities and funds necessary to repay any transfers needed for the cost of wildfire suppression operations.

There is no discussion in the appropriation text for using “unplanned fire” or achieving Land and Resource Management Plan objectives or even an exception for lands designated as Wilderness. Additionally, in the text there is no mention of prescribed burns, nor any text allowing a wildfire to become a prescribed burn.

It is clear from the Wildfire Suppression Appropriation as enacted, that Congress is legislating Wildfire Suppression through the appropriation.

End of Paper

Appendix A.29. Opinion Editorial: The Consequences of Federal Wildfire Suppression Policies and the Need to Reconsider.²¹⁶

As wildfires continue ravaging our nation, particularly in the 11 Western States, we must look closely at federal wildfire suppression policies in use since 2009. The "managed wildfire" approach, adopted by the Forest Service, has granted the agency power over not just the fate of our public forests but also public and private property, wildlife and their habitats, and the lives of those residing within wildfire-prone areas. This assumed authority has been exercised with no accountability.

The Forest Service has yet to report on the cumulative and compounding environmental effects of its approach to letting big fires burn. The agency may be losing the “Chevron deference” that claims the science of wildfire effects is unclear and that the rest of us should defer to their decisions. As the consequences of the policy become more apparent, we must critically examine the reasoning behind the Forest Service's actions and question whether the current strategy is in the best interest of our environment, communities, and people.

The mounting evidence of negative wildfire effects, including persistent smoke, extensive burning, and the tragic post-fire flooding that took the lives of three individuals near Las Vegas, NM, last year, is becoming increasingly difficult to ignore. As the devastation caused by wildfires continues to escalate, scientists, academics, and professionals diligently seek to understand why these fires are causing more damage and lasting longer than they did a mere decade ago.

While the Forest Service often attributes these changes to climate, a more challenging and potentially significant factor is the practice of "applied wildfire" - using wildfires, whether ignited by humans or lightning, to achieve objectives other than immediate fire suppression.

There is a certain logic behind the idea of containing a destructive wildfire by essentially encircling it with a controlled burn. This approach involves retreating to the nearest defensible ridge, constructing fire lines, and then igniting fires from those lines as a means of corralling the fire.

However, as the consequences of alternative wildfire policies become more severe, we must recognize that the current approach may not be effective, sustainable, or legal. We must carefully reassess the assumptions underpinning these strategies and explore alternatives that prioritize both the safety of our communities and the health of our environment.

The North Complex Fire of 2020 and the Black Fire in the Gila National Forest in 2022 are stark reminders of the potential for managed fire policies to spiral out of control, causing widespread

destruction and loss of life. On September 6, 2020, firefighters lit an indirect firing operation on the North Complex in Northern California. On September 8, “widespread firing ops” blew up and crossed the Middle Fork of the Feather River. On September 9, the fire roared to life in red flag winds, burning 180,000 acres, two communities, and a 500-acre camp for child cancer patients and killing 16 civilians.

Firefighters used drones to light most of the Black Fire’s 325,000 acres. Drone-lit fires more than ten miles south of the southernmost flank of the Fire were designed to burn the entire Aldo Leopold Wilderness. The Incident Commander told Sierra County Commissioner Jim Paxon they had been trying to burn the wilderness for years. Now, they were using drones to light the fires.

The Forest Service's failure to account for these tragedies and the lack of public involvement in decisions, including air tanker and fire-retardant use to support large-scale firing operations, underscore the urgent need for transparency and accountability.

It's time to rethink this baffling resource management practice, this massive, premeditated burning. The government has a legal duty to warn people, to involve affected people, and to conserve our air, water, timber, vegetation, cultural uses of the forest, and so much more.

As we confront the ever-growing threat of wildfires, we must question the efficacy of current federal wildfire suppression policies and explore alternative approaches that prioritize the safety and well-being of both our communities and our environment. Only then can we hope to mitigate the devastating impacts of these fires and build a more resilient future for our nation’s forests.

Appendix A.30. Opinion Editorial: The Use of Livestock on Wildfire Management.²¹⁷

Note: Recently, in an email discussion associated with *A Call to Action*, there has been varying opinions about the effectiveness of using livestock as a natural means for hazardous fuels reduction. The following is a learned opinion by Phil Aune on this subject matter.

Thanks to all who have weighed in on the subject of expanding the use of horses and perhaps other browsers and grazers to help reduce the threat of the impacts of wildfires. First my background as a silviculturist. I had a 37-year career as a silviculturist that started in 1970 and ended in 2000. My last assessment was a 13-year stint as Program Manager of the Redding Silviculture Lab of the Pacific SW Research and Development Station. One of our assignments was to investigate alternatives to herbicides for controlling brush, grass, and hardwoods. One of the many alternatives to the use of herbicides studied was the use of cattle and sheep to control plant competition. We did not evaluate the use of horses in our studies as there was little support for or previous use of horses to control competing vegetation in the Mediterranean environments of CA and southern OR. Also, we did not specifically study grazing/browsing effects on wildfires. There is no doubt that the following animals do indeed reduce the amount of plant competition by their grazing and/or browsing.

The following information is based on my personal observations and the work of several people noted in the information. Developing a scientifically sound research paper would take too much time for an old retired guy. However, I am convinced that the conclusions highlighted at the end of my personal observations would be the same as those of a scientifically sound research paper:

Cattle: Highly palatable woody species like deer brush are substantially reduced by cattle grazing. One of the early proponents of cattle grazing in a planted forest was the work District Ranger Glenn Sindell following the 1960 43,000-acre Volcano Fire on the Foresthill Ranger District of the Tahoe National Forest. The highly palatable deer brush was substantially reduced; however, the plants were not controlled by cattle browsing as they resprout again and again. Eventually, they grow too tall for cattle to browse or even deer. When browsed, these highly palatable plants are often replaced by unpalatable plants like Greenleaf manzanita. The general observation by just about every forester who ever tried using cattle to control woody plants was that browsing was not an effective treatment in reducing plant competition. Later, these observations were statistically validated with our research efforts at the Redding lab with our Research and Development projects. See the efforts of Phil McDonald and Gary Fiddler and others for statistically sound evaluations.

Opinion: Cattle grazing in woody plant communities has little long-term effects in wildfire situations as these plants continue to sprout and/or reestablish after browsing. At best, there may be a slight effect early in the life of a woody plant brush community after a wildfire or major stand-destroying impact. If you can keep the woody plants from becoming the dominant species on these sites, a major positive effect on subsequent wildfires can occur. Anyone who has ever fought wildfires knows how difficult it is to fight fires in these woody plant communities once they are re-established and dominate the sites. Unfortunately, cattle browsing will not help in this situation. Horse grazing is simply out of the question for these woody plant communities. These woody plant communities dominate the vast majority of the Sierra Nevada range, northern CA, and southern OR. *It is safe to say that browsing will have minimal effect on the current wildfire and long-term wildfire situation.*

**THIS IS
KEY.**

There is no doubt that cattle grazing in the grass/forb communities has a positive effect in reducing the volume of plants in these communities. Grazing studies, in fact, clearly document and provide the basis for sustainable grazing strategies to keep cattle and other grazers from overgrazing range allotments. In the grass/forb plant communities of the CA and southern OR, grazing by cattle, sheep, and horses can have a positive effect on reducing palatable grass/forb species. *It is safe to say that grazing will have a positive effect on the current wildfire and long-term wildfire situations.*

Sheep: In the woody plant communities discussed previously, sheep browsing has similar effects as cattle browsing. Dave Thomas was the District Silviculturist on the Downieville Ranger District of the Tahoe National Forest, and he was very interested in sheep grazing in his reforestation efforts. He worked with Dr. Phil McDonald of the Redding Lab to initiate a sheep grazing study in the reforestation efforts of the 1977 Cap Fire on the Downieville District. Dave knew that the sheep when brought up from the Sacramento Valley pastures would immediately browse on the young ponderosa pine seedlings in his planted areas and research project if he offloaded them in the planted areas. So, he offloaded them where they had nothing but brush to eat before entering the planted areas as they were herded to the project area. They simply became used to eating the local brush species and generally avoided the young ponderosa pine. This proved to be great insight as the research showed that there was no statistical difference in ponderosa pine seedlings and actual damage in the browsed areas as compared to the sheep exclosures.

The major difference in the areas browsed to the exclosures was the change in plant communities. Deer brush was almost completely consumed in the browsed areas and the Greenleaf manzanita was almost completely avoided. The browsed areas became a ponderosa pine/manzanita after ten years while the exclosures were a mixture of Deer brush and manzanita.

Sheep browsing had no statistical effects on the growth and development of the ponderosa pine seedling. *It is safe to say that sheep grazing and browsing will have minimal effect on the current wildfire and long-term wildfire situation.*

Goats: Cleveland National Forest Silviculturist George Lottritz used goats to help control the combination of chaparral brush and grass in fuel breaks. The 1970s project was very successful as the goats consumed just about all of the plants within the fuel breaks. Constant heading was essential to keep the goats from overgrazing the fuel breaks. This was the only major use of goats that I can recall during my career. One of the side benefits that George reported on at a Regional Silvicultural workshop was the great goat BBQ after the goats were removed from the fuel breaks at the end of the season.

**THIS IS
KEY.**

Early in my life in the 1950s, we lived in Box Canyon in southern CA’s Santa Susan Mountains. Ventura County had strict regulations about clearing chaparral and grass from around the residences and buildings. My brother and I spent many hours cutting down weeds until we bought two goats and staked them out to clean up the Ventura County fire clearings. The goats were exceptionally good in keep the weeds down. By the way, the old house that was built in 1949 is still standing after facing at least three or four major brush fires in the last 70+ plus years.

Goats eat just about everything they encounter, including young seedlings. Because of this, they have limited utility in most forested conditions. In the grass communities, other grazing species probably have more utility than goats. *Given all these factors, goats have limited potential for reducing the impacts of wildland fires. They certainly can be used to help control flammable material from around residences, buildings, and open lots similar to my early experiences in Box Canyon.*

Horses: Nadine Bailey, in her response yesterday to all the emails, did an excellent job of describing the amount of forage consumed by horses. She also concluded that horses would have limited utility in helping to reduce the scale and scope of the current wildfire situations.

Conclusion: Cattle, sheep, goats, and horses all consume woody plants, grasses, and forbs that provide some of the fuels for the current wildfire situation. The use of these plant-consuming species is simply another tool in the arsenal of practices that will be necessary to get on top of the current situation. Such use will be most effective in the grassland communities and their use will have limited utility in the woody plant communities. They are not the panacea given the size, scope, and complexity of the current overstocked forest and grassland fuel conditions.

**THIS IS
KEY.**

Appendix A.31. Wildfire Risk Reduction, Carbon Dioxide Removal, and Biochar: The Challenge of Scaling Up

Concept for NAS scoping workshop, October 2023

Al Sample (vsample@gmu.edu)

National Academy of Sciences [NAS]

Board on Agriculture and Natural Resources

In response to the increasing frequency and extent of damaging wildfires, Congress has sharply increased federal funding for forest restoration activities such as thinning and hazardous fuels removal to decrease the impact of wildfires in high-risk forest regions. Most of these activities are taking place on National Forests and other federal lands, with additional support for activities on state, tribal, and private forest lands. Harvest operations are expected to generate enormous volumes of wood biomass over the next decade and beyond, materials that have little or no commercial value because of the lack of markets or high transportation costs.

Absent other options, standard practice is to pile and burn these materials or allow them to decompose—both of which result in significant emissions of carbon dioxide and other greenhouse gases. There is limited local use of chipped wood biomass for bioenergy, which also results in short-term carbon emissions. Conversion of wood biomass to biochar retains its carbon intact, and the use of this biochar as a soil remediation can remove this carbon from the atmosphere entirely and store it away for centuries, or even millennia. Research has shown that the use of biochar as an agricultural soil amendment can enhance soil fertility and improve soil water retention, reduce irrigation needs, and decrease greenhouse gas emissions from the manufacture and application of chemical fertilizers. Ongoing research on the use of biochar as a silvicultural soil amendment, especially in the rehabilitation of burned areas or abandoned mine sites, suggests that it can significantly increase ground cover and tree seedling survival, and possibly long-term growth rates while also reducing wind and water erosion.

Accelerated forest restoration activities are already generating large volumes of wood biomass, especially in the western US, with much more expected in the next few years. The capacity for biochar production is currently very limited, with few facilities within practical range of where many of the high-priority forest restoration projects will take place. The objectives of the study are to:

1. Synthesize and summarize the most current available scientific and technical information relevant to wood biochar production, its effect on carbon emissions from harvested wood

biomass, and the effects of biochar soil remediation on soil productivity, water use, soil carbon regeneration, and long-term carbon storage.

2. Analyze the status and trends in biochar production and utilization in terms of current technologies, supply chain logistics, and economics in comparison with alternative options for disposing of large volumes of wood biomass that have few if any commercial applications.
3. Examine the potential economic transformation in biochar production and utilization from purchases of carbon credits by private organizations seeking to make their operations carbon neutral, and seeking mechanisms that meet the highest standards for demonstrated additionality, documentability, and essentially permanent carbon removal and storage.
4. Facilitate the discussion of a range of policy mechanisms that could help stimulate investment in advanced biochar production technology, and accelerate the expansion of biochar production capacity especially in locations within practical range of forest areas of the highest priority for forest restoration to reduce the risk of future damage and loss from wildfires.

The study will be organized along the lines of the following framework:

1. Quantitative estimates of the volume of new wood biomass generated by forest restoration initiatives
 - 1.1. Ten-year timetable
 - 1.2. Estimates for major US forest regions, showing differences in ramp-up of forest restoration activities
 - 1.3. Primary focus on federal lands
 - 1.3.1. National Forest System, BLM (data available via USFS-RMRS)
 - 1.3.2. State forest lands, to the extent that data are available
 - 1.3.3. Tribal and private, to the extent that data are available
2. Options for utilization
 - 2.1. On-site decomposition
 - 2.2. On-site pile and burn
 - 2.3. Bioenergy (chipping and transportation to local or regional markets)
 - 2.4. Wood biochar (pyrolysis and transportation to local or regional markets)
3. Analysis of options
 - 3.1. Availability of needed technology
 - 3.2. Status of existing and anticipated capacity
 - 3.3. Economics of production, utilization and supply chains
 - 3.4. Carbon profile and implications
4. Current and potential utilization and markets for biochar
 - 4.1. Agricultural soil remediation in croplands, orchards, vineyards
 - 4.1.1. Research results on effects on soil fertility, soil water retention
 - 4.1.2. Effects of reduced needs for water, inorganic fertilizers

- 4.1.3. Potential for reducing GHGs directly (NO emissions following fertilizer applications) and indirectly (natural gas use in fertilizer manufacturing [Fischer-Tropsch])
- 4.2. Forest management
 - 4.2.1. Reforestation
 - 4.2.2. Burned area rehabilitation (incorporate research on seedling survival and growth rate on biochar-remediated soils)
- 4.3. Surface mine spoils reclamation
- 5. Biochar and climate solutions
 - 5.1. Potential of biochar for net carbon sequestration
 - 5.1.1. Immediate potential for sequestration of carbon from biomass generated from ramped-up forest restoration activities on federal lands
 - 5.2. Effect of carbon credits on economics of biochar production and utilization
 - 5.2.1. Private sector carbon neutrality programs attracted by demonstrated additionality, documentability, and long-term tenure of carbon storage
 - 5.2.2. Recent corporate purchases of carbon credits has brought down prices of biochar, expanded its market, and greatly expanded its application and use
 - 5.3. Case studies:
 - 5.3.1. [Restoration Fuels](#) (John Day, Oregon); reforestation, agricultural
 - 5.3.2. [Pacific Biochar](#) (Santa Rosa, California); vineyards/orchards soil remediation
 - 5.3.3. [Wakefield Biochar](#) (Valdosta, Georgia); agricultural soil remediation
 - 5.3.4. [Univ of Arizona](#) (Tucson, Arizona); agriculture, reforestation, burned area rehab
- 6. Policy implications
 - 6.1. Stimulating R&D on advanced biochar production technologies, e.g., mobile pyrolysis, multi-product pyrolysis
 - 6.2. Business stimulus grants and low-interest loans to catalyze the development of biochar production capacity in locations key to the wildfire risk reduction strategy
 - 6.3. [Other initiatives in the current biochar research legislation and/or draft Farm Bill]

For Now, Put All Unplanned Wildfire Ignitions Out Immediately; No Exceptions

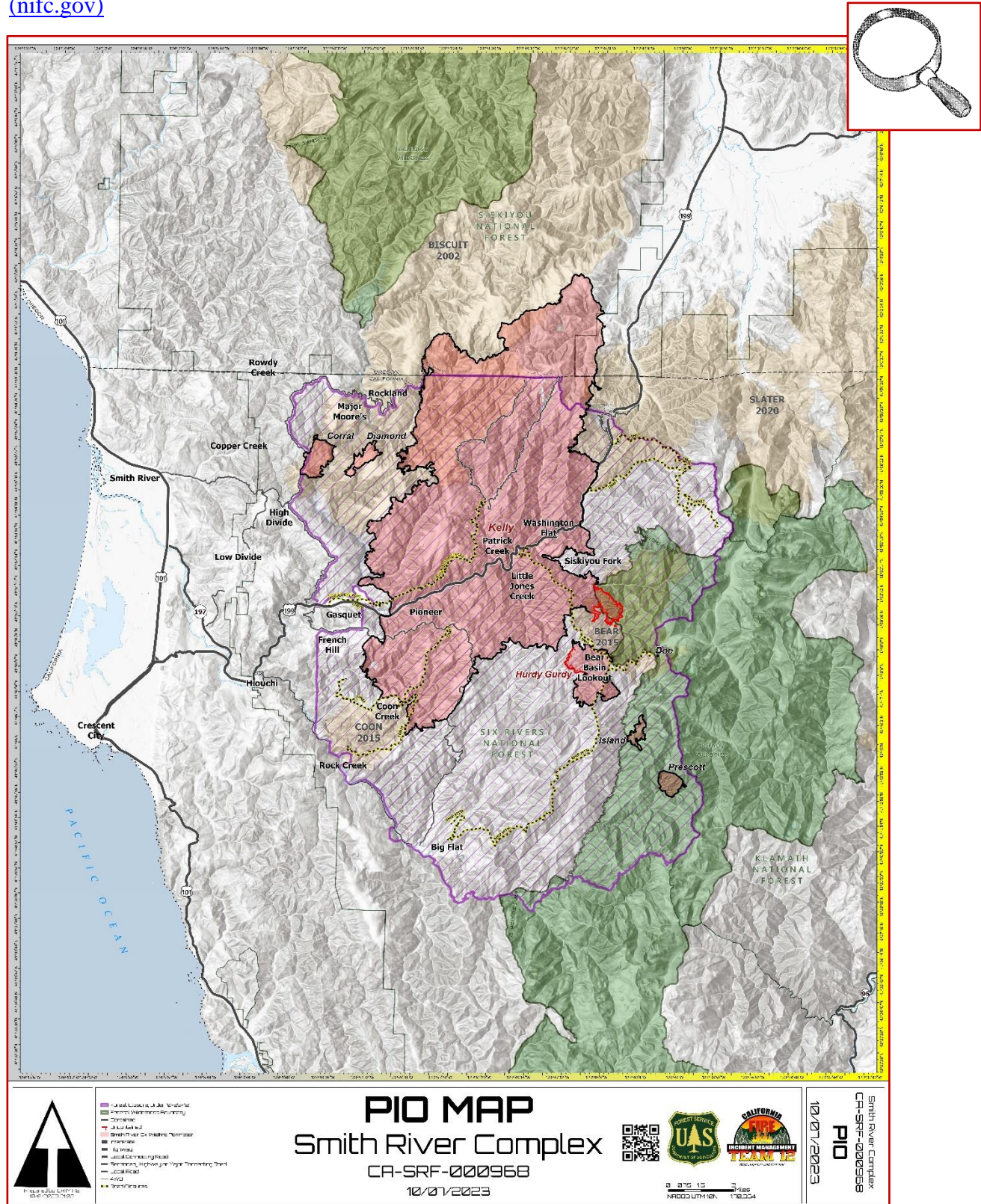
Remember, "if you change nothing, nothing will change. Now is the time for change. Enough is enough."

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Contributors

**CALL TO
ACTION**

Appendix A.33. Just for Today, Current Wildfires of Note

Current Wildfires Burning in the U.S.: [National Fire News | National Interagency Fire Center \(nifc.gov\)](https://www.nifc.gov)



A Closer Look at the Smith River Complex in Northern California: As of October 22, 2023, the Smith River Complex is now 95,107 acres and is 95% contained. [Casrf Smith River Complex Information](#) | [InciWeb \(nwcg.gov\)](#)

Latest News: October 9, 2023

Acres: 95,107

Containment: 95 percent

Cause: Lightning

Start Date: Aug 15, 2023

Total Personnel: 238 [value subject to change]



Current Situation: The fire is being held within the containment lines and total containment at 95% with the total acres burned at 95,107. Fire suppression repair crews will be assessing the containment line with weather permitting. Crews remain vigilant and continue to assess the fire from the ground.

Crews will continue with extensive suppression repair and hazard tree abatement work when the weather will allow. As of Sunday, the Hurdy Gurdy has been 100 percent contained. Repair work in the French Hill area and the 405-Road with adjacent Spur Roads will continue as part of the Suppression Repair Plan. Crews along with heavy equipment in conjunction with the Resource Advisors are continuing to assess hazard trees and have them removed as part of the hazard tree abatement plan.

This will be the last update for this incident, as of rev. 17.1 of *A Call to Action*.

Appendix A.34. USDA Forest Service, Chief’s Annual Letter of Intent for Wildfire [LOI] – June 15, 2023



Forest Service

1400 Independence Avenue, SW
Washington, D.C. 20250

To: Regional Foresters, Station Directors, IITF Director, Deputy Chiefs, and WO Directors

Last year was a pivotal time in Forest Service history with the launch of our [10-year Wildfire Crisis Strategy](#) and the 90-day pause on prescribed fire and learning review. It also was another challenging year for our wildland firefighters, dispatchers, cache personnel, and employees who support fire response. I recognize that even though we never reached National Preparedness Level 5 in 2022, the fire year still took a mental and physical toll on our employees.

As always, I expect you to focus on our people first. It is our responsibility as leaders to ensure our employees feel physically, psychologically and socially safe. As such, we will remain grounded in risk management principles and committed to our value of safety. We also will continue to support and defend any employee who is doing work in support of our mission. I expect you to address instances of bullying or harassment and reflect these policies and our commitment to safe, harassment free environments in our work and in your delegation letters.

Our sustained commitment to a safe and resilient workforce also means continued emphasis on employee wellbeing. The simple truth is that we cannot carry out our mission if employees are mentally and physically fatigued. I expect you to encourage employees to take advantage of the wide array of services and resources available through the new [Behavioral Health and Employee Wellbeing Program](#). More services will become available in the future through the [Joint Wildland Firefighter Behavioral Health and Wellbeing Program](#) in partnership with the Department of the Interior.

We also need to take advantage of the historic opportunities and investments that will improve our employees’ lives. I ask each of you to remain committed to addressing employee housing, modernizing firefighter position descriptions, and using authorities within your control to ensure the health and wellbeing of our workforce. Supporting these efforts will help us recruit and retain the best workforce.

Increased wildfire activity continues to challenge us. We will continue safe and effective initial attack to protect communities, critical infrastructure, and natural resources, as reflected in our initial attack success rate of 98% to contain new fire starts within 24 hours. We will also continue to use every tool available to reduce current and future wildfire impacts and create and maintain landscape resilience, including using natural ignitions at the right time and place in collaboration with tribes, communities, and partners. Use of natural ignitions as a management strategy will also be approved by Regional Foresters during Preparedness Levels 4 and 5 in accordance with the Red Book.

The Forest Service’s policy is that every fire receives a strategic, risk-based response, commensurate with the threats and opportunities, and uses the full spectrum of expectations, we will need to balance resources available for wildfire response with those needed to make progress on forest treatments to reduce wildfire risk.

We must remain committed to our Wildfire Crisis Strategy, as grounded in the [National Cohesive Wildland Fire Management Strategy Addendum Update \(forestsandrangelands.gov\)](#), to do all we can to protect communities, critical infrastructure, and natural resources. We must act with a sense of urgency in the face of this crisis, and use all available emergency authorities and improved business practices to increase the pace and scale of our work to match the scale of the problem. Science-based approaches and tools such as the [“Wildfire Risk to Communities”](#) and [“Risk Management Assistance”](#) dashboards, the [Scenario Investment Planning Platform](#), and [Potential Operational Delineations \(PODs\)](#) will continue to be important for fuels treatment design, wildfire response, and post-fire management strategies.

It is equally critical that we collaborate with partners to achieve mutually beneficial goals across boundaries and in all landscapes. Expanding partnerships to increase capabilities, whether in fire response or other work on the ground, is necessary to meet the current challenges. It is my expectation that all line officers and fire leadership will use pre-season engagement planning with their state, county, and local governments, community leaders, and partners, leveraging the best science available, including the Potential Operational Delineation (PODs) program led by Research and Development. When PODs are in place, agency administrators should ensure that incident management teams use them to inform suppression strategies; when they are not, every effort should be made to develop them real-time as part of strategic operations.

Implementing change, like those brought about by our National Prescribed Fire Program Review and Wildfire Crisis Strategy, can be difficult, but also offers great opportunity. This year, we will continue to prioritize prescribed fire on a larger geographic scale. Our success will be measured not only in accomplishments, but also in how well we set aside our individual unit goals and commit to stewarding the whole with partners by our sides. I expect you to consider delaying or setting aside other mission related work when necessary to take advantage of favorable conditions for prescribed fire opportunities. The new [National Prescribed Fire Resource Mobilization Strategy](#) identifies ways to prioritize available resources across both suppression and prescribed fire. With limited qualified personnel who can plan and implement prescribed fire, I ask you to provide leader’s intent to all supervisors to allow trained and willing personnel to go on prescribed fire assignments.

As always, we will rely on our core values of safety, interdependence, conservation, diversity and service to help us navigate these changes. As a learning organization, we must continuously adapt to support employees, save lives, protect communities, and care for the land we manage. I understand that changes and cultural shifts are difficult, and our success is not possible without you. With the ongoing wildfire crisis, we need to adapt but remain grounded in our agency’s values, code and commitments. If we focus on taking care of each other, we can overcome our challenges and truly make a difference for the lands we steward and the people we serve.

RANDY MOORE

Chief

Can you imagine, America’s Chief Forester stating in the annual 2024 Letter of Intent [LOI] for Wildfire that the “...USDA Forest Service will, for the foreseeable future, strive to put out all unplanned wildfires immediately.” What a clear, powerful, impactful statement that would be. It’s long overdue.

Michael T. Rains [February 11, 2024]




Appendix A.35. America’s Forests in the Balance: A National Emergency:²²⁰ *A Call to Action: Eight Critical Actions*

Foreword. With the earlier revisions of *A Call to Action*, eight [8] critical actions were summarized in a cover note email that was sent to a wide-range of recipients regarding the Smith River Wildfire Complex in Northern California.²²¹ These 8 critical actions are gaining considerable support. They are part of the ten [10] actions listed in the *A Call to Action*, starting on page 9 of the full document. The goal of this paper is to become more aware of the 8 critical actions listed below and customize these actions to future incidents and their specific local conditions.

Critical Actions	Page# ²²²	Actions Customized to Local Conditions
1. Lack of forest maintenance is the highest priority. Funding is far from adequate. The specific minimum annual <i>additional</i> investment for just the Forest Service is +\$2.2 billion annually for at least 5-7 years.	16 27	
Note: To be completed for each action for future incidents, addressing specific local conditions.		
2. Put out all unplanned wildfires immediately; no exceptions. The notion of “Managed Fire” or “beneficial fire” is not acceptable at this point in time.	10 94	
3. Smoke continues to be a big-time killer. We must keep it to a minimum. This fact needs to be continually highlighted. The longer we “manage” the unplanned wildfire, the more smoke there is, the more lives lost. A pretty basic concept.	14	
4. Reduction in hazardous fuels is fundamental to the success of resilient forests [forests are more than just trees] and reducing the intensity of unplanned wildfires. For example, regarding the recent Maui fires, we knew 30 years ago this would probably happen without landscape scale forest maintenance. And, it did.	18 19 129	
5. Expanded biomass uses, including biochar and wood-based nanotechnology , can be a “game changer” for items 1 and 4. Processing infrastructure must be enhanced.	20 126	
6. The Wildland Urban Interface [WUI] must be fire wise and safe. It is an economically efficient investment if accomplished in a cohesive, comprehensive manner.	21 28	
7. Improved aerial fire suppression tactics are key. We must improve our unplanned wildfire suppression obligation with a much stronger and cohesive Initial Attack capability that is enhanced with improved aerial firefighting tactics. Wildfire protection plans should include parameters for initial response as part of the National Aviation Strategy. Specifically, <i>Standards of Cover</i> ²²³ should be established for initial response aviation assets on every fire. These <i>Standards of Cover</i> will ensure that every unplanned wildfire start will have a meaningful, capable aviation response engaged with the fire within 30 minutes of the initial fire report.	21	
8. Better utilization of the Smokejumper cadre is critical to achieving item 2, above. For example, where were the Redding Smokejumpers regarding the Smith River Wildfire Complex on the Six Rivers National Forest.	22 131	

September 2023 Email to Selected Contributors: I have tightened up the 8 actions. It would be very instructional if we could customize each action to specific incidents [i.e., large scale unplanned wildfires] or landscape scale areas [i.e., high risk areas in Curry County, OR]. I have placed several hyperlinks in the 1-page document to assist the reader.

My thoughts: Complete the last column of the attached table – in very brief terms – and use the information to:

1. Change the way unplanned wildfires are suppressed and *bring attention* to:
 -  The lack of forest [forests are more than just trees] maintenance.
 -  Options for expanded biomass uses.
 -  The extreme lack of funding for forest maintenance – the very tactic that will eventually reduce the astronomical costs of fire suppression.

I wrote these 3 additional points on a recent email exchange to help support the 8 critical actions:

1. America is faced with a national emergency – the destruction of lives and property from unplanned wildfires. The lack of forest maintenance is the primary culprit. Congress is willing to spend a million dollars+ an hour for firefighting [reacting], but is hesitant to address the root cause of the destruction [clogged up forest [forests are more than trees] landscape]. Thus, over the last three decades especially, **NOTHING CHANGES. At the current pace, the great western forests will become brush fields by 2045.**
2. The current approach by the USDA Forest Service to “manage the fire” is simply an *intellectual argument*.² With current land conditions, the notion of a “managed fire” or “beneficial fire” is extremely dangerous. It must be stopped. At least FOR NOW.
3. With every ignition, the goal should be to immediately put the fire out – not back away to the “next best ridge.” Note that in the recent annual Chief’s Letter of Intent for Wildfire, there is no mention of the goal to put out the unplanned wildfire as quickly as possible with a strong Initial Attack. Many of the very large fires we are facing [or have been faced with] could have been contained at a much smaller acreage burned with a strong, appropriate Initial Attack. For example, the Tamarack Fire in California in 2022. I dare say this fire might have been contained to less than 20 acres if a squad of USDA Forest Service Smokejumpers would have been deployed. In the end, this fire burned about 70,000 acres. The goal in *A Call to Action* is to “...put out every fire immediately and reduce response time by at least 80 percent!” What a powerful Chief’s Letter of Intent for Wildfire it would be if such a goal were stated. I can only imagine; oh my gosh!

² See page 3 of this document.

The Concept of Managed Fire: For Now, An *Intellectual Argument*

Perhaps I should have used a different phrase than “intellectual argument” when referring to “manage” or “beneficial” fire. Clearly, the phrase is correctly attributed to me. The phrase is coming from my background as the Director of the Northern Research Station and the Forest Products Laboratory, USDA Forest Service. Forest Service scientists, who make productive careers out of a particular line of science can be very reluctant to adjust with the times. The rewards system in science is not very conducive to change. Thus, some things become “intellectual” arguments. That is, the “science-based” narrative does not reflect the current times or land conditions, in this example. For me, it doesn’t do any good to reference fire tactics that may or may not have been used 100 years ago. We must be more contemporary to address the practicality of using “fire on the landscape.” Ask the people in Paradise, Greenville or Weed, California what they think.

Clearly, I do not believe that fire as a forest maintenance tool has always been an intellectual argument, in total. I refer you to my essay with Tom Harbour, “193 Million Acres: Toward a Healthier and More Resilient US Forest Service, page 129, “Restoring Fire as a Landscape Conservation Tool: Nontraditional Thoughts for a Traditional Organization”, 2018, The Society of American Foresters, Steve Wilent, Editor.

If you read the essay, you can clearly see that I believe in fire as a forest maintenance tool, when it is “...at the right time, at the right place and the fire is right.” Frankly, since I crafted the *National Fire Plan* twenty years ago, I have not seen too many of these situations [i.e., the three “rights”]. Thus, I conclude for NOW, it is not the time to “back off to the next best ridge.” The conditions won’t allow it. And, let’s look at the facts. Over the last decade especially, when we *manage* fire with the current land conditions and the current operative skill set, it has been largely a mess [Dixie, Caldor, Tamarack Fires, as examples].

So, all I am saying is, for NOW, until the forests are in a better condition to accept fire as a maintenance tool, let us have an objective to put all fires out immediately. Then, when the forests [forests are more than just trees] are more accepting, we can and should use fire, under prescription, to meet resiliency objectives. Yes, this will take time. But like our former Chief, F. Dale Robertson often said, “...the Forest Service is in it for the long haul.” The Chief’s annual Letter of Intent for Wildfire for 2024 would be a grand step forward if the letter included the aforesaid objective.

Note: We must continually understand that the current concept called “managed fire” is not the same as “prescribed fire.” Prescribed fires, also known as prescribed burns, refer to the controlled application of fire by a team of fire experts under specified weather conditions to restore health to ecosystems that depend on fire. Prescribed fire is often used to mimic the low-intensity fire that would have naturally occurred on the landscape. It’s an important forest maintenance tool that benefits forests and wildlife, while also helping to reduce the impact of wildfire hazards. Prescribed fire is truly a planned fire that is being carefully managed. Please read the very instructional and impacting article in Evergreen™ by Jim Peterson, entitled *Managed Fire or Misfire?*, August 29, 2020, to help better understand the differences between “prescribed fire” and the current notion called “managed fire.”

Appendix A.36. The Great Western Forests Convert to Brushfields Due to Unplanned Wildfires

On August 27-28, 2023, Phil Aune, Ted Stubblefield and myself²²⁴ were reacting to the Chief’s *Letter of Intent* for Wildfire [page 131 of this document]. During the discussion, I suggested the following: “...At the current pace of unplanned wildfires, the great western forests will become brush fields by 2045.” The following is part of that very instructional dialogue, including a brilliant section entitled, “...Travels with Phil.”

Michael T. Rains. Earlier this week [August 25, 2023], I sent a wide-range of contacts the latest revision 16.7 of *A Call to Action*. Also, in my cover email to these contacts, I included the following eight [8] items that need to be focused on to address this National Emergency destruction due to catastrophic unplanned wildland fires:

1. Lack of forest maintenance, especially on public lands, is the highest priority. Funding is far from adequate.
2. Put out all fires immediately; no exceptions. The Notion of “Managed Fire” is not acceptable. See footnote No. 3 of the full document. It captures the point succinctly. Also. See pages 11 and 99 of the full document.
3. Smoke continues to be a big-time killer. Unfortunately, it is largely going unnoticed. The longer we “manage” the fire, the more smoke there is, the more lives lost; pretty basic stuff.
4. Reduction in hazardous fuels is fundamental to success [i.e., the Maui fires; also, read the Hawaii Tropical Forestry Recovery Act, page 129 of full document]. We knew then, this [the Maui fires] would probably happen without landscape scale forest [forests are more than just trees] maintenance [forest care]. And, it did.
5. Expanded biomass uses, including biochar, can be a “game changer.”
6. The Wildland Urban Interface [WUI] must be fire wise and safe. It’s a wise investment if accomplished in a cohesive, comprehensive manner.
7. Improved aerial fire suppression tactics is key. THIS CANNOT BE OVERSTATED.
8. Better utilization of the Smokejumper cadre is critical to achieving item 2, above. I am still wondering if the Redding [California] Smokejumpers were called for deployment for the recent fires on the Six Rivers National Forest [see page 131 of the full document]? I do not think so. If I am correct, that would be a shame.

Also, attached for your information is America’s Chief Forester’s annual *Letter of Intent for Wildfire*, dated June 15, 2023. Notice item No. 2, above: Put out all fires immediately; no exceptions. The notion of “Managed Fire” is not acceptable. It is with great concern that the *Letter of Intent* for 2023 includes the following: “...Use of natural ignitions as a management strategy will also be approved by Regional Foresters during Preparedness Levels 4 and 5 in accordance with the Red Book.” As stated in *A Call to Action*, the current land conditions simply do not allow for the notion of “managed wildfire.” See page 10 of the full document. It states:


“... These are different times. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn anywhere, for whatever reason, for the foreseeable future, is unacceptable and must be stopped now; no exceptions.”

For example, the current fires in northern California seem to offer a carte blanche for “let burn” based on the direction of the current *Letter of Intent*. We cannot allow this to happen. The 2023 fire season is unfolding and we must do all we can to protect lives and property by striving “...to put all fires out immediately.” I would sure like to see this [“...to put all fires out immediately”] in the revision of the *Letter of Intent*. I am also asking my contacts – and now you all -- to reach out to those who “decide” and support the passage of H.R. 934:
<https://www.congress.gov/bill/118th-congress/house-bill/934/text>

In summation, share your voice far and wide to:

1. Support the aforesaid 8 items to help reduce the horrific impacts of unplanned wildfires.
2. Support the passage of H.R. 934.

These two items – [1] focus attention on the 8 key points mentioned above AND [2] support H.R. 934 [I understand this legislation is still in the initial phases heading for inclusion into the next Farm Bill] – I ask you to focus on, especially:

1. America is faced with a National Emergency – the destruction of lives and property from unplanned wildfires. The lack of forest maintenance is the primary culprit. Congress is willing to spend a million dollars+ an hour for firefighting [reacting], but is hesitant to address the root cause of the destruction [clogged up forest (forests are more than trees) landscapes]. Thus, over the last three decades especially, NOTHING CHANGES.  At the current pace, the great western forests will become brush fields by 2045.
2. The current approach by the USDA Forest Service to “manage the fire” is simply an intellectual argument. With current land conditions, the notion of a “managed fire” is extremely foolish.
3. With every ignition, the goal should be to immediately put the fire out – not back away to the “next best ridge.” Note that in the Chief’s *Letter of Intent*, there is no mention of the goal to strive to put the fire out as quickly as possible with a strong Initial Attack. Don’t be fooled by the following statement in the Letter of Intent: “...We will continue safe and effective initial attack to protect communities, critical infrastructure, and natural resources, as reflected in our initial attack success rate of 98% to contain new fire starts within 24 hours.” The 98 percent mention is a tricky and misleading value. Many of the very large fires could have been contained at a much smaller acreage burned with a strong, appropriate Initial Attack. For example, take the Tamarack Fire in California in 2022. I dare say this fire might have been contained to less than 20 acres if a squad of Forest Service Smokejumpers would have been deployed. In the end, this fire burned about 70,000 acres. The goal in *A Call to Action* is to “...put out every fire immediately and reduce response time by at least 80 percent!” What a powerful and meaningful *Letter of Intent* it would be if such a goal were stated. I can only imagine what a grand focus this would be to help protect the American People.

Ted Stubblefield [aka "Stub"]. Brush fields by 2030, the way it's going. There "seems" to be very little reforestation ongoing and no one is using herbicides, so we are converting "forest lands" at the rate of several million acres a year. Phil can correct me if I have this wrong. He knows best.

Phil Aune. Stub, you nailed it, brush fields everywhere, and for the next 50-100 years for the natural reforestation process to work and the brush fields will dominate. Without the use of herbicides, it is a futile effort to try to reforest the forest lands that basically lack substantial moisture from the end of May to the end of October.

*Travels with Phil:
In Search of Fires in California and Oregon After the Smoke Has Disappeared.*

John Steinbeck wrote a book in 1962 called: *Travels with Charlie: In Search of America*. The following is called, *Travels with Phil: In Search of Fires in California and Oregon after the smoke has disappeared*.

This all started with an email conversation with a friend over recent fires in California and the potential lack of reforestation. The conversation began when I responded to his comment about the lack of reforestation following fires, "You nailed it, brush fields everywhere, and for the next 50-100 years for the natural reforestation process to work and the brush fields will dominate. Without the use of herbicides, it is a futile effort to try to reforest the forest lands that basically lack substantial moisture necessary for seedling survival from the end of May to the end of October." I then went on to describe my trips and observations on some of the recently burned areas of California.

Down to California from Washington. On my drives down to California from Washington, I frequently go through Bend and Klamath Falls before heading to Weed and ultimately, Redding. Fires are the dominant feature off Highway 97, especially as you are near the Collier Memorial State Park and Logging Museum. Lots of dead trees are still standing and as you come down to the Logging Museum, where they have cleaned that up somewhat. Then, as you hit CA when you leave the Butte Valley National Grassland heading for Weed, you start to pick up fires again with roadside hazard trees removed and blackened trees everywhere. As you enter the 2021 Lava Fire area, the high desert environment above Lake Siskiyou is black as the ace of spades. Going down I-5 from Weed to Redding fires again to be the dominant feature south of Castella as you approach Shasta Lake. Both sides of the freeway have burned with intense fires. The private lands have been salvaged and the reforestation process is in process. The fire-killed trees on national forest land are still standing.

Coffee Creek 2021. In 1962, my first job with the US Forest Service was at the Coffee Creek Ranger Station on the Shasta Trinity National Forest. The Ranger Station sign is pictured below taken on my 2021 trip. This was a wonderful place to begin my career as a forester.



The purpose of this October trip was to see the results of the Haypress Fire that occurred earlier that year. The trip up Highway 3 from Weaverville to Coffee Creek was a trip down memory lane with green forests still blanketing the landscapes. However, when I turned up the Coffee Creek Road that headed up toward the Trinity Mountain Meadow Resort, the landscape was black. Here is one photo of the area taken from the Coffee Creek Road, just below the old Coffee Creek Resort.



The road runs right next to Coffee Creek and burned trees from opening the road were already floating across Coffee Creek. All that was left of the beautiful Coffee Creek Resort was the river stone wall along the road and lots of fire debris from the loss of the buildings. Also, most of the homes along this portion of Coffee Creek were burned. This was personal as some of my long-term friends lost their homes along the Coffee Creek Road in the fire.

I did not go up to Mountain Meadows in the Trinity Alps because of the fire and the County crews were still opening the road. This drive was one of the most spectacular in California as the old road that went up into the Trinity Alps Primitive Area. The road was still accessible after the Trinity Alps Wilderness Area was created and I used to go there for their 4th of July celebrations. I sincerely doubt that other than some surviving trees from the Haypress Fire, my grandchildren, and my great-grandchildren will not have the opportunity to see what this wonderful country looked like with its beautiful tree-covered landscapes that used to be there. Brush fields with standing dead trees will be the dominant landscape feature for the next 20 years. As the blackened snags ultimately fall, all that will remain is acre after acre of brush as the natural reforestation takes place over the next 75-100 years. This is all based upon the assumption that the Forest Service will not salvage and actively reforest these burned areas as is their current practice on vast areas burned. That is a far cry from what was done with active salvage and reforestation after the Ramshorn Fire that occurred in the late 50s on the Coffee Creek Ranger District.

Dixie Fire 2021. I have taken several trips through the Dixie Fire and observed the private lands being aggressively salvaged and sites being prepared for reforestation. Driving from Chester to Quincy in 2022, a lot of the Collins Pine Forest land that had been burned was being salvaged and they will promptly reforest and take care of their land. Meanwhile, the National Forest and National Park Service lands will be blackened trees for several years. The Dixie Fire burned 963,000 acres of private land, Lassen National Park, and lands on the Plumas and Lassen National Forests. Driving through this burn one encounters mile after mile of burned forests, however, what was most heart-wrenching was driving into the devastation the Dixie Fire did to the old historic town of Greenville, CA. Almost 75 percent of this town was lost in the fire.

In 2022, I had the opportunity to visit the Swain Mtn Experimental Forest near Chester, CA which had been burned by the Dixie Fire. This Experimental Forest focused on the management of true firs in the *Abies* genus. A lot of the long-term experiments focused on red fir regeneration studies were initiated in the 1960s and 70s and they were damaged by the Dixie Fire. According to the USFS researchers who developed this trip, there were no major plans in place to salvage the dead red fir and develop new restoration experiments.



This old red fir shelterwood harvest/reforestation research plot was burned and the reforestation that became established after the shelterwood harvest was lost in the Dixie Fire.

What was surprising was how well the red fir for Levels of Growing Stock (LOGS) plots did during the fires. These old thinning studies did fairly well in terms of minimal fire effects and offered an opportunity to expand their historic research values. Researchers will do something with fire effects on those plots if they get some funding for the staff they need. My old Redding Silviculture Lab is down to 3 scientists from the peak of 12 that we had when I served as Program Manager. Following is a picture taken at one of the LOGS plots that was minimally damaged by the fire. Needle cast resulting from the fire covers now covers the ground.



One of the oldest studies was a brush field restoration research project started by Don Gordon in the 1960s. He had successfully reforested an old snowbrush ceanothus brush fields and he had published several research papers on this study. The entire planted area was destroyed during the Dixie Fire and as of 2022, there were no plans or further research work in this area. The study area looks like this:



On my way back to Redding after visiting the Swain Mtn. Experimental Forest (LTSP), I had the opportunity to see one of the Long-term Soil Productivity research efforts after a fire on the Shasta Trinity National Forest. Dr. Jianwei Zhang took me to one of Dr. Bob Powers plots that

had been burned. The picture below shows forest conditions after the fire near the LTSP plot that had been burned. Over 20 years of data had been collected on the plots that had been burned. There is a unique opportunity to re-establish those plots and establish a research design to evaluate the long-term soil productivity effects of fire. At this time, it is uncertain if such a research effort would be undertaken. Similar plots on the Sierra National Forest burned several years ago and nothing was done to those plots.



US 299 Trip. I also drove from Redding to Arcata last year and met up with and had breakfast with a friend from Trinity River Lumber Co. We had a great visit getting caught up on events. He said just before I left our breakfast in Weaverville, "Phil, you won't believe the Trinity River drainage as you head west on 299." He was right, one burn after another with thousands of acres of standing dead. You could easily tell the private lands as they were exactly like the private lands on the Dixie Fire with salvage and the start of the reforestation process. The black forests have already started the establishment of sprouting brush species and annual plants that utilize the available soil moisture necessary for successful reforestation. The knowledge base that supports controlling woody and grass plants in forests for successful reforestation has been known for over 50+ years. Unfortunately, doing nothing on California's forest lands will not lead to reforestation of our burned-over areas.

Sequoia National Forest. Last April, I was on the Hume Lake RD of the Sequoia National Forest on business for the National Museum of Forest Service History. After that event was over, I arranged a trip with the Hume Lake RD District Ranger and his Fire Staff. We drove through quite a large burn as we headed to Hume Lake. The only salvage was roadside hazard trees. Unfortunately, there were no further plans for salvage and reforestation. The photo on the next page shows the fire effects on the road to Hume Lake.



The next day I drove to Kernville over the Greenhorn Summit to see the fire effects on the old Greenhorn Ranger District. Again, as I reached the forest above Glennville, CA, I encountered more of what is now common in CA’s National Forests--acre after acre burned. Going over the summit down into the small town of Wofford Heights, the entire southerly facing drainage was burned right down to Wofford Heights. Same thing as the rest of the burned national forest lands in CA. Some roadside hazard tree salvage and future snag patches are ready to burn again. Reforestation without first cleaning up is futile. The view toward Greenhorn Summit looked like this:



September 2023 Trip. I concluded my trips to California by visiting the Mad River Ranger District where I worked from 1970 to 1975 as the Ranger District Silviculturists. On my way down along the Oregon coast near Coos Bay, I had the opportunity to travel through about ten miles of smoke from fires in southern Oregon’s National Forests. I was heading to Arcata to attend a Celebration of Life event for a friend and Humboldt State classmate. The next day, instead of heading east on 299 to go to Redding, I went to Fortuna and headed east on Highway 36 to see my old Mad River RD which has had several major fires in the past few years. When I stopped at the Ranger Station, the folks there said that most of the fires were on the southerly portion of the Ranger District and a large portion of the District had burned.

I then continued over South Fork Mountain and the roadside views were mainly covered with green forest conditions and the entire landscape looked roughly like when I left in 1975. What was also interesting in this sea of green were the old 1960s clearcuts along Buck Mountain above the Van Duzen River that had been reforested. In the early 70s, they were obviously clearcuts and now they blend quite well into the surrounding forests. Unless you carefully looked or roughly knew where they were, you would not visually know they were old clearcuts.

After I reached the summit on Highway 36 and started dropping down into the Trinity River Drainage, I started to see the same old effects of numerous recent wildfires.



These were not massive burn results like the Dixie Fire and others, but they were unsalvaged burn patches along the north-facing slopes of South Fork Mountain. As I crossed the South Fork of the Trinity and entered Forest Glen, the situation changed as the effects of the August Complex Fire of 2020 were everywhere. The results were a massive large-scale fire that looked like the next picture near the Hell Gate Campground three years later. A small group of people to the right of the end of the curved dirt road were having a field meeting. I had no idea as to the scope of what their field meeting was all about. My guess is that since they were down near the riparian areas of the South Fork of the Trinity River, they were probably discussing something relating to fire effects on water quality problems due to the fire.



This concludes my equivalent of *Travels with Charlie: In Search of America* which led to my *Travels with Phil: In Search of Fires in California and Oregon after the Smoke has disappeared*. The pictures included are worth a thousand words in telling the story and that is why they are included. When these trips ended, I had viewed just about every major fire area in northern CA, except the western portion of the Klamath NF which probably looks a lot like my trip through US 299 and the Trinity River drainage.

The common thread after the smoke has disappeared is that the green forests that we once knew and loved now have large portions of blackened forests. There is very little salvage of the fire-killed trees except on private forest land. These remaining dead trees will stay there for the next 10-30 years as snags before they drop to the ground and become fuel for the next fire. The burned forests are already changing into green brush fields that will take up to 50 to 100 years to become reforested with sapling-size trees. Is this the legacy we want to leave our children, our grandchildren, and our great-grandchildren? We have the knowledge and skills to reforest these areas. Unfortunately for some unknown reason, we lack the willingness to deal with the problem on our National Forest Lands.

Phil Aune’s Background...

My first reforestation job was in 1960 helping a Humboldt State Professor on a reforestation project that involved planting bare root seedlings plus laying out research plots. Throughout my college years, several of forestry majors spent our Spring Breaks on the Coffee Creek Ranger District planting trees on the old Ramshorn Fire. After graduation in 1965, I served as a Junior Forester on the Cannell Meadow Ranger District of the Sequoia National Forest. We had a unique reforestation job that required us to pack our seedlings using horses and mules up to the Kern Plateau as we could not reach the planting areas by vehicle. Every morning our Forest Service crew would ride our horses to the planting sites and begin our daily planting. Our evenings were spent caring for the stock and camping out in the cold weather at the end of March. We kept our planting stock in snow banks so that root growth would not start while they were stored.

In 1970, I moved on to the Mad River Ranger District where I was the District Silviculturist. Our annual program consisted of planting about a thousand acres per year using about a half million bare-root seedlings. The annual planting program was accomplished using contract planting crews and Ranger District personnel. We also had a large stand-tending program controlling plant competition in our planted areas.

In 1975, I was promoted to Forest Silviculturist on the Tahoe National Forest. Our five Ranger Districts planted between 2,000 to 4,000 acres annually. When I arrived, we were at the tail end of reforesting the 1960, 43,000-acre Volcano Fire and the 1960, 50,000-acre Donner Fire. Every Ranger District had old fires and old brush field that were converted to planted forests. All of these efforts utilized various practice to control plant competition in the reforestation process. In addition to those historic fires, we had several major fires that were salvaged logged before planting during my tenure. The Capp Fire on the Downieville Ranger District and the Freeway Fire on the Truckee Ranger District are a couple of examples.

In 1987, I was promoted to Program Manager of the Redding Silviculture Lab of the Pacific SW Research and Development Station. We had four research teams focused on management of competing vegetation in process of re-establishing forested conditions after wildfires and harvesting. We also had research efforts on soil productivity, young stand management, fire history and ecology, and silvicultural practices. Our research, development, and application goal was conducting research on just about every aspect required to successfully reforest and manage forests conditions on California's forest land. I ended my USFS career at the end of 1999 at the Redding Silviculture Lab.

Appendix A.37. Report, Wildland Fire Mitigation and Management Commission²²⁵

Note: I [Rains] was fortunate to be on the Webinar that introduced the Commission’s Report. Like *A Call to Action*, the Commission calls the issue of unplanned wildfires, a National Emergency. It is time that we act as such and begin to make meaningful change. We know what to do. So, let’s do it. The key is expanded forest [forests are more than just trees] maintenance.



Biden-Harris Administration’s Wildland Fire Mitigation and Management Commission Releases Report Outlining Comprehensive Recommendations to Change the Nation’s Relationship with Wildfire²²⁶

WASHINGTON, Sept. 27, 2023 – Today, the Wildland Fire Mitigation and Management Commission released [its report](#) outlining a comprehensive, consensus-based set of recommendations to Congress to address the nation’s wildfire crisis.

The Commission, created by President Biden’s [Bipartisan Infrastructure Law](#) and [announced in December 2021](#), was charged with making recommendations to Congress to improve federal policies related to the mitigation, suppression and management of wildland fires in the United States, and the rehabilitation of land devastated by wildland fires. Composed of representatives from federal agencies, state, local and Tribal governments, and representatives from the private sector, the Commission has met monthly over the last year to discuss and craft these recommendations.

According to the terms of [the statute](#) in the Bipartisan Infrastructure Law, the commission is co-chaired by the Department of Agriculture, Department of the Interior, and Federal

Emergency Management Agency. The 50 commission members have a broad range of expertise with wildfire, including firefighting, prescribed fire, cultural burning, watershed restoration, pre-fire mitigation, research, public health, post-fire recovery and more.

The Commission’s comprehensive and holistic recommendations provide strategies for transforming our wildland fire response approach from reactive to proactive, building sustainable and long-term solutions, and creating communities and landscapes that are more resilient and adaptable to wildfire as a fundamental part of our world. Proposed solutions also strongly support increased collaboration and coordination across scales and jurisdictions, and greater inclusion of all entities within the wildfire system. Taken together, these recommendations are intended to help lead the nation toward a different relationship and experience with wildfire.

The Biden-Harris Administration is using every tool available to reduce the risk of catastrophic fire across the nation’s forests and to strengthen our wildfire preparedness, response and recovery efforts to protect communities, critical infrastructure, and natural resources and restore fire-adapted ecosystems, while taking better care of the people serving on the frontlines,” said Agriculture Secretary Tom Vilsack. “We are thankful for the commission’s diligent work to prepare a comprehensive set of recommendations that will help drive future solutions in confronting our nation’s wildfire crisis and setting up our workforce for success.”

“As climate change drives longer, more intense and more dangerous wildfires, every community across the country is experiencing the impacts—whether from smoke-filled skies or catastrophic losses,” said Secretary of the Interior Deb Haaland. “Under the leadership of President Biden, the Commission’s report will chart a new path forward for the nation on wildland fire mitigation and management, helping to ensure we are building the workforce, resiliency and collaborative approaches needed for the future.”

“The increasing frequency and intensity of wildfires is a threat to our homeland security,” said Secretary of Homeland Security Alejandro N. Mayorkas. “The whole of government approach to wildfire prevention, combined with the strategic investments in our workforce recommended by this commission, will ensure DHS personnel remain prepared to go anywhere, anytime extreme weather impacts communities. We are investing over \$684 million this year to give local fire departments the personnel, tools, training, and resources to meet these challenges and we look forward to continuing this work with our federal partners in the years to come.”

“The recent disaster on Maui is a tragic reminder of the growing risks of wildfires to communities and the heartbreaking losses they leave behind,” said Federal Emergency Management Agency Administrator Deanne Criswell. “The detailed recommendations provided by this Commission emphasize the urgent need to work across jurisdictions and disciplines to protect our nation’s residents, communities, and natural resources from fire. Together, we will pave a bold new path to wildfire resilience nationwide.”
Recommendations outlined in the report can be summarized by seven [7] key themes:

1. **Urgent New Approaches:** Historically and institutionally addressed as a land management problem, wildfire -- and the crisis it has become -- spans jurisdictions and ecosystems and threatens critical infrastructure, built environment, public health, and public safety. As such, collective, holistic, cross-boundary action is critical to address the present challenges. Some of the report’s suggestions in this theme include: establishing a Community Wildfire Risk Reduction Program to proactively address risk, change financial incentives and change agency metrics to better focus on performance of ecological health over acres treated.
2. **Supporting Collaboration:** Successfully meeting the challenge of wildfire mitigation and management requires approaches that better involve all relevant entities and every scale of society.
3. **Shifting from Reactive to Proactive:** Only by putting significantly more focus and resources toward proactive pre-fire and post-fire planning and mitigation can we break the current cycle of increasingly severe wildfire risk, damages, and losses.
4. **Enabling Beneficial Fire:** The need to expand beneficial fire, such as prescribed and cultural burning, must be balanced with the public health threats associated with smoke and reduced air quality produced through beneficial fire and implemented through pre-fire planning that helps share decision-making, enable mutual understanding, and facilitate the consideration of tradeoffs associated with various fire response and management decisions.
5. **Supporting and Expanding the Workforce:** Federal investment is urgently needed to create a cross-trained year-round workforce that is focused on and tailored to mitigation, planning, and post-fire response and recovery, with strategies in place for recruitment and retention.
6. **Modernizing Tools for Informed Decision-making:** The Commission recommends a number of measures that would better coordinate, integrate, and strategically align fire-related science, data and technology.
7. **Investing in Resilience:** There is a need for increased funding that is more sustained and predictable, keeps pace with the escalating crisis, and includes a focus on the mitigation of risk and impacts both before and after wildfire is critical and will reduce costs in the long run.

This is the second report to be released by the Commission. Th, which focused on aerial equipment and a strategy to meet equipment needs through 2030, was released in February.

While the Commission’s focus in this report was on federal legislative action, the solutions proposed are also relevant to state, local, Tribal and territorial governments, the nonprofit, private and academic sectors, and the public at large.

The Commission's recommendations recognize the urgency and importance of providing increase pay and benefits for federal wildland firefighters and address a number of related workforce needs. The Bipartisan Infrastructure Law supported temporary [landmark pay increases](#) for federal wildland firefighters, which aim to bring federal firefighter pay in alignment with their state and local counterparts, while aiding in recruitment and retention of a more permanent and stable wildland firefighting force across the federal government. The Commission’s recommendations were informed by the Department of the Interior’s “[Five-Year Monitoring, Maintenance, and Treatment Plan](#),” which provides a roadmap for addressing wildfire risk on Department of the Interior-managed and Tribal lands. They were also informed by USDA Forest Service’s “[Confronting the Wildfire Crisis](#)” strategy, which aims to treat 20 million acres of national forests and grasslands and 30 million acres of state, local, Tribal and private lands over the next 10 years to reduce wildfire risk where it matters most. These plans help facilitate the collaborative work between the two Departments. In total, President Biden’s Bipartisan Infrastructure Law and Inflation Reduction Act include over \$7 billion in funding across the interagency to enhance our ability to mitigate and respond to wildfires.

The Commission’s work builds on existing interagency federal efforts, such as the Wildland Fire Leadership Council and the White House Wildfire Resilience Interagency Working Group. The Biden-Harris administration will continue to pursue an all-of-government approach to wildfire risk reduction and resilience. For more information visit the commission website or email wildlandfirecommission@usda.gov.

Appendix A.38. Because It Is a Matter of Life or Death

Note: This article first appeared in the October 16, 2021 Livestock Market Digest. Reprinted courtesy of the Livestock Market Digest www.aalivestock.com

Our Nation Needs a National Initial Wildland Fire Attack Policy Today: Because It Is a Matter of Life or Death²²⁷

The 2021 fire season in the West was the worst in history in many regions. The Dixie Fire in California, nearing one million acres of devastation, will soon be contained by the weather, in spite of the fire management team’s effort to stop it during the last two and a half months. The well-equipped and exceptionally well-trained fire suppression crews, including CAL Fire and the US Forest Service with their partners in the National Interagency Fire Center (NIFC), proved no match for this mega inferno.

This massive area will remain a blackened memorial to the US Forest Service’s inability to fulfill their Mission of “Caring for the Land and Serving People.” This fire started on July 13th with several small blazes. For reasons we are just beginning to understand, the Forest Service did not choose to put those small fires out.

Instead, citizens found out, in the most insidious way possible, of the “Let Burn” policy. This US Forest Service National Fire Management Policy was made very clear to all of us in the wake of this massive burn--through direct witness of the loss of entire towns, family homes, businesses, livelihoods and generations of lifetimes of land and resource stewardship. We felt the human anguish (some of us firsthand) as well as heard the cries of wildlife and livestock as they innocently were caught in the walls of flame.

It is clear that the political agendas of various internal and external parties have infiltrated the Forest Service and other government agencies and have weakened the will, morale and ability of the leadership of the Forest Service to perform professionally. The fact that we, the public, were not included in the development of a national wildland fire policy called “let burn” is painfully clear and totally unacceptable.

This lack of public involvement in fire management planning has bewildered us and left us less willing to put up with the Forest Service’s brazen attitude about their expertise in forestry and wildland fire management. Not following their own federal policy making regulations--including public involvement in assessing fire management policy alternatives as well as assessing the environmental impact of all management alternatives--cannot be ignored. They are authorized only to make policy and management decisions that have been through this process. They have clearly been operating outside of their own federal policy making regulations and have not complied with the National Environmental Policy Act.

We have been treated as if the government agency alone knows what is best, and that they and their partners are the experts and that certain “stakeholders” were involved in their policy creation---presumably leaving no need for citizen input. Those stakeholders turn out to be

special interest groups and consultants. The fire issue has become “them” versus the American public.

Those who have relied on Washington, DC politics to cover their tracks in Wildland Fire Management have failed the American people by not seeking public advice and support in how they planned to fight fires. It has left us stunned and enraged with the arrogance of the federal players, including the stakeholder “climate change ecologists”.

It is time that we Americans retrieve our right to be involved in federal policymaking. We cannot be excluded, or we will be acquiescing--and complicit in--the complete devastation of our forests, grasslands and waters.

The lack of active forestry practices over the past 35-plus years has resulted in overgrown fire-prone forests. The extreme disastrous impacts of “fiddling while California burns” is best heard through the anguished appeals of the hundreds of thousands of the Dixie, Monument, River, Camp, North Complex, Lava, and other wildland fire victims (of this year and past years) whose lives and futures have been scorched and laid bare.

Many are now homeless, destitute and soon to be traumatized further by the short-term memory lapse of no further media attention. Their individual voices must be magnified and heard by all Americans, over the roar of the fires. We all have a clear stake in each other’s pain and anguish when we are at the mercy of a politically-driven federal policy that makes no sense.

Many people in California, Idaho, Washington, Oregon, Montana and other western states have first-hand knowledge of what it is like to see the out-of-control fire whose flames are being “herded” and not extinguished. We have seen the use of fire to fight fire. It’s alarming to see a shoulder-to-shoulder fire crew wielding drip torches to throw more fire to create large “burn outs” that have only served to cause more destruction.

Forest Service Regional Officials announced that the Dixie Fire is so large that containment must be a long-term plan. Forestry and other resource “experts” looked beyond the urgent needs of the citizens as this fire was nearing the destruction of more than a million acres. This fire scorched a path through several communities, including Greenville, whose families remain in trauma and homeless.

We must support a goal to improve future federal forest management. Pursuing a sound, safe Initial Fire Attack ---putting each fire out immediately after it starts--must be implemented if there are going to be any unburned national forests remaining in five years in California. Unfortunately, Wildland Fire Management Policy changes with the election of each U.S. President. President Biden’s agenda is driven by “Climate Change” and supported by certain ecologists with an agenda to restore our lands to “pre-European settlement conditions”.

The politically driven eco-environmentalists have been emboldened by the Administration’s political agenda. This means that Forest Service Chief Moore, as a Biden appointee, will support continuation of the “Let Burn Policy” and will resist an aggressive “Initial Fire Attack Policy”. This is a dire emergency for citizens across the nation. We must seek a nonpolitically driven Wildland Fire Policy. Wildland Fire is impartial and does not discern whether you are a Democrat, a Republican, Independent or a member of the Green Party.

Accepting a policy that kills people, wildlife (and destroys natural habitat), livestock, natural resources, and livelihoods is not acceptable and is sadly only political. We must implement an Initial Fire Attack Wildland Fire Management Policy quickly, as if it were a matter of Life, or Death, because IT IS!

Appendix A.39. Damaging Effects of High Intensity Wildfires on the Forest and Their Habitats?²²⁸

While low intensity wildfires bring some benefits to the forest, wildfires of high intensity are incredibly damaging to the forest; to the forest floor and soil, to its habitat, to its fauna, to forest wild animals, to the forest’s eco system and its environs.

How hot do high intensity forest fires get? Forest fires often reach or exceed temperatures of 2,000° Fahrenheit which is equivalent to one-fifth the temperature of the surface of the sun. And that is higher than the temperatures reached in crematoriums which are typically kept at 1650 degrees Fahrenheit and turn bone into ash. Hi intensity wildfires can be incredibly damaging to the forest and the damage will continue for years to come.

Science shows the benefits of low intensity wildfires.

Science shows the terribly damaging effects of high intensity wildfires.

Science demands that a valid risk benefit analysis be done before deciding to act or not to act in making critical decisions about interventions.

The risks of not immediately and aggressively attacking wildfires in hazardous conditions in the forest are immense. And the benefits of not immediately and aggressively attacking wildfires are nil. **Exception:** There are benefits that come from pre-planned, preapproved controlled burns carried out in cool, moist weather conditions with little or no wind.

High intensity wildfires can rage out of control and cause massive destruction to the forest and those in its environs. And they can leave the forest and its habitat terribly damaged.

Consequently, all wildfires should be immediately and aggressively attacked with all the resources necessary to fully contain the fire within 24 hours. With hazardous conditions in the forest, wildfires can explode into raging, racing, uncontrollable fires that do massive damage to the forest.

Tamarack Fire, California 2021. [The Tamarack Fire](#) was a high intensity wildfire in a forest with extremely hazardous conditions for fire. By USFS Officials choosing to monitor the fire for 13 days instead of attacking it, this high intensity wildfire became uncontrollable and raged and raced through the forest destroying 67,000 acres of prime forest, burning to ashes dozens of homes, and nearly killing a team of firefighters trapped in its flames. It damaged the forest floor, its soil and habitat for years to come. This fire could have been easily contained had the USFS immediately and aggressively attacked the fire.

Caldor Fire, California 2021. This high intensity wildfire started when there were extremely hazardous conditions for fire in the forest. The USDA Forest Service’ Placerville Ranger District officials’ failure to immediately and aggressively attack this fire with all the resources necessary to contain it resulted in a conflagration destroying over 220,000 acres of prime forest, burning to ashes 780 homes and diminishing the clarity of the pristine waters of Lake Tahoe. And it damaged the forest floor, its soil and its habitat for years to come. The Caldor Fire could have been fully contained had they immediately and aggressively attacked the fire with all the

resources necessary to control it. See [CBS 60 Minutes’ expose’ on Caldor Fire](#) and the virtual destruction of the little town of [Grizzly Flats](#) which was aired on 2 October 2022. You can see it on YouTube.

How Does Wildfire Impact Wildlife and Forest? **By Meghan Snow. Sacramento Fish and Wildlife Office Ecological Services**



High-intensity, high-severity wildfires burn through the forest from the floor to the canopy generating intense heat. These high-severity wildfires moving across large landscapes can be devastating for wildlife, habitat and surrounding communities. They are terribly destructive and the damage they cause continues for years into the future.

Low intensity fires can “clean” and thin the forest by removing thick, flammable vegetation on the forest floor. The result is improved habitat for wildlife, healthier soil and new growth of native plants. It also helps reduce the risk of large-scale high-severity wildfires that are so destructive. Preplanned, preapproved low-intensity controlled burns carried out in cool, moist weather with little or no wind can be beneficial to the forest.



Appendix A.40. USDA Forest Service Fire Suppression: The Beginning of a New “10 AM” POLICY?²²⁹

Note: This Appendix A.40 is designed to familiarize the reader with the fire suppression tactics of the USDA Forest Service – from the early “10 AM” policy that had an *objective* of putting out all unplanned wildfires within 24 hours to the current policy that allows for *managed* or *beneficial* or *let it burn* suppression tactics. The following is a more contemporary definition²³⁰ of what the “10 AM” policy should look like:

“...Use all available resources to carry out wildfire suppression with the purpose of extinguishing all wildfires detected on such lands no later than 10 AM after such a wildfire is detected and if not controlled by 10 AM of that first 24-hour period, establish a new goal of extinguishment by 10 AM the next day or each succeeding day by increasing the availability of firefighting resources. “

Bill Derr, et. al., October 21, 2023

EVOLUTION OF FEDERAL WILDLAND FIRE MANAGEMENT POLICY²³¹

The first national fire policy came after several years of severe fires between 1910 and 1935. In the context of the ecological theory of the time, fire exclusion was believed to promote ecological stability. In addition, fire exclusion could also reduce commodity damages and economic losses. In 1935, the USDA Forest Service instituted the “10 AM” Policy, whereby the objective was to prevent all human-caused fires and contain any fire that started by 10 a.m. the following day. By the 1960s, fire management costs were increasing exponentially.

The 1964 Wilderness Act, Tall Timbers Research Conferences, and Southern Forest Fire Lab research demonstrated the positive benefits derived from natural and prescribed fire. As a result, national fire policy began to evolve to address both the economic and ecological benefits of not aggressively controlling, and even using, fire.

In February 1967, the USDA Forest Service permitted leeway for early- and late-season fires. In 1968, the National Park Service changed its policy to recognize the natural role of fire, allow natural ignitions to run their course under prescribed conditions, and use prescribed fires to meet management objectives. In 1971, the USDA Forest Service 10-Acre Policy was added, which set a pre-suppression objective of containing all fires within 10 acres.

In 1977 a new fire policy was selected by the USDA Forest Service that replaced both the 10 AM and 10-Acre policies. The new policy encouraged a pluralistic approach — fire by prescription. Even for suppression, once initial attack failed, alternatives to full suppression were to be considered. Fire suppression became fire management.

The 1989 review of the 1988 Yellowstone fires continued fire policy evolution. The review report affirmed the positive benefits of fire, but also identified the inherent risks and liabilities of

using fire and recommended greater planning, preparation, cooperation, and management oversight.

The 1994 fire season with its 34 fatalities (14 at South Canyon, Colorado) precipitated the 1995 Federal Wildland Fire Management Policy and Program Review (1995 Report). This review again affirmed the positive benefits of fire. It recognized that fire was part of a larger problem, one of several symptoms of natural ecosystems becoming increasingly unstable due to altered ecological regimes. It talked about the needs for landscape-level resource management, the integration of fire into land management planning and implementation, and the involvement of all affected landowners and stakeholders.

The 10 AM Policy. In 1935, the Forest Service established the so-called 10 a.m. policy, which decreed that every fire should be suppressed by 10 a.m. the day following its initial report. Other federal land

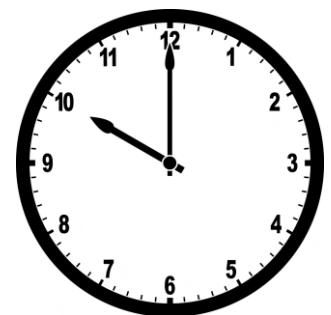
“In 1935, the Forest Service had a “10 a.m.” policy which stipulated that a fire was to be contained and controlled by 10 a.m. following the report of a fire, for, failing that goal, control by 10 a.m. the next day and so on.”

management agencies quickly followed suit and joined the campaign to eliminate fire from the landscape. Fire suppression efforts were aided by the development of new technologies, such as airplanes, [smokejumpers](#), and fire suppression chemicals. With such tools, fires could be fought anywhere—and were.

A Context of Disagreement. Today, there are significantly divergent opinions about the best way to address unplanned wildfire ignitions. Some conclude that a dominant Forest Service *goal* in 2023 and ahead, should be to put out all unplanned wildfire ignitions within 24 hours, no exceptions.” The current landscape conditions will not allow for “managed fires” or “beneficial fires” or a “let it burn” policy; they are not effective and indeed wasteful. Others believe that “managed” fire is essential to healthy forested ecosystems. See [page 10](#) of this document for opinions about the concept of “managed” fire.

“...The U.S. Government Is Wasting Billions on Wildfire Policy That Doesn’t Work.”²³²

“...Though the change in policy will affect how Forest Service fires are fought this season, Moore, the chief, said in his letter²³³ that the agency could return to letting fires burn when conditions improve — including as soon as the winter months. Moore stressed that fire remained an important tool, and the agency was not returning to the “10 a.m.” policy, a directive instituted in 1935 that pushed firefighters to put out every fire by the morning after it was reported. That policy, which led to years of aggressive fire suppression, contributed to current conditions. The Forest Service, Moore wrote, will instead return to using prescribed fire *in the right places and at the right time*.”²³⁴



USDA Forest Service Fire Suppression



Fire fighters going to the front, Lassen National Forest, 1927.

Legendary forest fires in the late 1800s like the **Peshtigo Fire of 1871** bolstered the argument by early conservationists like **Franklin Hough** and **Bernhard Fernow** that forest fires threatened future commercial timber supplies. Concern for protecting those supplies and also watersheds helped conservationists convince the U.S. government in 1891 to begin setting aside national forest reservations. When the USDA Forest Service was established in 1905, it was given managerial control of these lands, soon renamed national forests. Forest management necessitated fire protection. After all, foresters argued, why create national forests if they were going to burn down.

Just five years later, in what has become known as the "**Big Blowup**," a series of forest fires burned 3 million acres in Montana, Idaho, and Washington in only two days. The 1910 fires had a profound effect on national fire policy. Local and national Forest Service administrators emerged from the incident convinced that the devastation could have been prevented if only they had had enough men and equipment on hand. They also convinced themselves, and members of Congress and the public, that only total fire suppression could prevent such an event from occurring again, and that the Forest Service was the only outfit capable of carrying out that mission. Three of the men who had fought the 1910 fires—**William Greeley**, **Robert Stuart**, and **Ferdinand Silcox**—served from 1920 to 1938 as Forest Service chief, which put them in a position to institute a policy of total fire suppression.



Civilian Conservation Corps firefighting crew, Clark National Forest, 1937.

This policy had two goals: preventing fires, and suppressing a fire as quickly as possible once one started. To prevent fires, the Forest Service came out in opposition to the practice of light burning, even though many ranchers, farmers, and timbermen favored because it improved land conditions. It must be remembered that at this time foresters had limited understanding of the ecological role of fire. Forest Service leaders simply argued that any and all fire in the woods was bad because it destroyed standing timber. Educating the public about the need for **fire prevention** became an important part of this goal. In 1944, the Forest Service introduced the character Smokey Bear to help deliver its fire prevention message.

The other goal the Forest Service had was to develop a systematic approach to fire protection. In the decades following the Big Blowup, this would involve building networks of roads, communications systems, lookout towers, and ranger stations. To protect both federal and non-federal lands, the agency won passage of the **Weeks Act of 1911**, which in part established a framework between the federal government and the states for cooperative firefighting (the framework would later include private forest associations and landowners). By offering financial incentives to states to fight fires, the Forest Service came to dominate and direct what amounted to a national fire policy.



Fire fighters building a fire line, Gifford Pinchot National Forest, 1934.

Following several severe fire seasons in the early 1930s, fire suppression took on even greater urgency. In 1933, the federal government created the Civilian Conservation Corps, which put thousands of men to work building fire breaks and fighting fires. In 1935, the Forest Service established the so-called 10 a.m. policy, which decreed that every fire should be suppressed by 10 a.m. the day following its initial report. Other federal land management agencies quickly followed suit and joined the campaign to eliminate fire from the landscape.

Fire suppression efforts were aided by the development of new technologies, such as airplanes, smokejumpers, medicines, and fire suppression chemicals. With such tools, fires could be fought anywhere—and were.

Until around 1970, federal land managers remained obsessed with controlling large fires. But during the 1960s, scientific research increasingly demonstrated the positive role fire played in forest ecology. This led in the early 1970s to a radical change in Forest Service policy—to let fires burn when and where appropriate. It began with allowing natural-caused fires to burn in designated wilderness areas. From this the "let-burn" policy evolved, though it suffered a setback in the wake of the 1988 Yellowstone fires. Since around 1990, fire suppression efforts and policy have had to take into account exurban sprawl in what is called the wildland-urban interface. Another issue the Forest Service now faces is that fires have grown in size and ferocity over the last 25 years. The fire-fighting budget has grown to about 50 percent of the agency's entire budget, which limits funds available for land management activities such as land restoration and forest thinning that could aid in fire suppression.

A More Contemporary 10 AM Policy

On a 10 AM policy versus 24 hours [term recently used], here is the difference.²³⁵

1. 10 AM was picked because if not contained and/or controlled by then, burning conditions would preclude easy containment or control that day, hence, the 10 AM objective was shifted to the next day at 10 AM or each succeeding day until sufficient firefighting resources could be obtained to bring containment and/or control by 10 AM. Meeting the aforesaid *objective* required ordering additional firefighting resources.
2. “....purpose of extinguishing wildfires...no later than 24 hours after...detected...the [pending legislation](#), H.R. 934 [Section 1. Suppression of Wildfires], may fail to account for burning conditions after 10 AM. This may not provide for shifting to subsequent days when the number and availability of firefighting resources are insufficient to meet a 24-hour directive. Hence, the pending H.R. 934 as written, may be too narrowly defined, thus may not be attainable. Although, the word “purpose” is defined as “...an objective, effect, or result aimed at or attained”, one might conclude that the USDA Forest Service is not specifically directed in H.R. 934 to “extinguish” all unplanned wildfire within 24 hours, whereas if the word *objective* had been specifically used, putting the fire out within 24 hours would qualify as specific direction to do so. However, the 24-hour extinguishment wording could be interpreted as mandating the agency that they *must* extinguish all unplanned wildfires within 24 hours rather than a *purpose*. Hence, those that may oppose H. R. 934 may object to its current wording of *purpose* [Section 1, Line 9] vs. *objective*, albeit by an official definition the two words mean the same thing.
3. If the words *propose* vs. *objective* do in fact represent the cornerstone of concern, perhaps the wording in H.R. 934 could be edited to reference the 10 AM burning conditions *and* more specifically address the need to increase firefighting resources when unable to contain or control a wildfire by 10 AM on the day following the start of the wildfire. Here’s suggesting wording [edits].

(1) shall [Section 1, Line 7, H.R. 934 ____

(A) use all available resources to carry out wildfire suppression with the purpose of extinguishing all wildfires detected on such lands no later than 10 AM after such a wildfire is detected and if not controlled by 10 AM, establish a new goal of extinguishment by 10 AM the next day or each succeeding day by increasing the availability of firefighting resources.

Appendix A.40.1. Which Forest Is Being Protected? A Supporting Message for a New, More Contemporary "10 AM" Policy?²³⁶

Note: This Appendix A.40.1, a companion piece to Appendix A.40, helps augment the notion that a much stronger Initial Attack policy on unplanned wildfires is essential across America, NOW. Starting with "My Question", this piece is written by a continued contributor to *A Call to Action*. Both Appendices A.40 and A.40.1 include significant contributions from Bob Zybach and Bill Derr.

My Question: Which forest is being protected? This is not a rhetorical one, particularly when you consider the current Western States Emergency.

"In an era of change, the forest that was there before the fire may not return" as stated in the concluding remarks of the study, "[Wildfire-Driven Forest Conversion in Western North](#)

America is faced with a national emergency – the destruction of lives and property from unplanned wildfires. The lack of forest maintenance is the primary culprit. Congress is willing to spend a million dollars+ an hour for firefighting [reacting], but is hesitant to address the root cause of the destruction [clogged up forest [forests are more than trees] landscape]. Thus, over the last three decades especially, NOTHING CHANGES. **At the current pace, the great western forests will become brush fields by 2045.**

No. 1, Page 137, *A Call to Action*

[American Landscapes](#)," as published by Oxford Academic BIOSCIENCE in August 2020. It is important to note that continuously letting wildfires burn²³⁷ and reburn WILL completely change the character of the forest that once was. The study references cause and result from decades of reburn and implied lack of forest maintenance by the Forest Service all across the Western States.

A broad spectrum of twenty-three scientists, ecologists and associates, some of which are members of the Forest Service Rocky Mountain Research Station, gathered to discuss their findings. Our forest, Rogue River-Siskiyou National Forest, was in part studied and serves as an example of the disastrous effects of the let it burn and reburn cycle, now 7 times [2023] burned over in parts [[Figure 7](#) therein missing 2 more fires this year]. Over 130 academic and scholarly references were included to support their conclusions.

Intuitively and from experience we already know these changes are occurring. Ground truthing has already confirmed the study conclusions. We didn't need a study for confirmation. In lieu of what once were thriving forests and ecological systems, we now have destruction zones, not forests, with all the ecological impacts and ramifications that go along with unchecked, let it burn, and reburn wildfire destruction.

All the more reason to support Bill Dennison's [and several other colleagues, including Bill Derr] request to change the policy back to “10 AM” and immediate initial attack in an effort to stop the destructive cycle the Forest Service is currently in.

Further, I would like to propose that the [study](#) I reference above be included in the *A Call to Action* Appendices as it attempts to formalize the risks of reburn and let it burn consequences and it encapsulates, undeniable, anecdotal, experiences that are sweeping across the Western States [Appendix A.40.1 complies with this request].

In conclusion I note that the operative word in the study is "change", not for the better, or burn back better.

I quote again:

“...compels us to consider the possibility of profound and persistent ecological change across forested ecosystems. As such, management and conservation efforts should align with expectations of increasing forest vulnerability to conversion. **In an era of change, the forest that was there before the fire may not return.**”

Appendix A.41. Renewed Infrastructure Requirements for Sustainable Forest Maintenance

Note: A primary cause of the extreme damage from unplanned wildfires is the lack of forest maintenance. A reason for the lack of forest maintenance is the lack of a wood processing infrastructure that began to collapse with the Spotted Owl controversy²³⁸ more than 30 years ago.

On Friday, November 3, 2023, Dr. Bob Zybach sent an email to Oregon State Representative Court Boice regarding the lack of wood processing infrastructure vs. wildfire. The message is as follows:

Hi Court:

I’d like you to read an editorial by former sawmill-owner Bruce Whiting that I just posted — with his permission — to Sharon’s blog: <https://forestpolicy.org/2023/11/03/i-knew-the-forests-would-burn-when-activists-forced-sawmills-like-mine-to-close/>

This is the exact same problem that exists with wildfire risk in Curry and Josephine Counties [Oregon] [and Coos, Jackson, and Douglas] — no remaining infrastructure to even process the thousands of snags, downed wood, and overcrowd stands remaining from the 1987- now wildfires.

I’m currently working with Wayne Knauf to develop a proposal to begin reversing this nonsense with economic and biological arguments for actively managing our public forests to reduced wildfire risk while creating thousands of needed jobs in our rural communities — without attention to “climate change” or “carbon sequestration” as being necessary objectives. Mostly energy production, better reforestation planning, and forest maintenance [including roads] to reduce unnatural fuel build-ups and greatly reduce large-scale wildfire events in the future.

Please share this link with the folks at South Coast Lumber and others you feel might be interested. We need a national approach to this problem, and Curry County could be an excellent demonstration model.

Bob

With the aforesaid message, Appendix A.41 will begin to document a dialogue about “...the lack of wood processing infrastructure in America, especially the west, and the causal impacts on forest maintenance and the destruction from unplanned wildfires. This will include relevant weblinks, documents and emails. The goal is to assess the true nature of the wood processing infrastructure across America, especially in the west.

Selected Key Weblinks Regarding Timber Industry and Infrastructure:

-  [The Great Lie] <https://www.rangemagazine.com/specialreports/06-fall-american-forests.pdf>
-  [Forest Management, Barred Owls, and Wildfire in Northern Spotted Owl Territories] <https://www.mdpi.com/1999-4907/13/10/1730>
-  [Record of Decision] https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_046095.pdf
-  [Timber Industry Challenges the Biden Administration] <https://www.opb.org/article/2021/03/06/timber-industry-joe-biden-administration-northern-spotted-owl-federal-protections/>
-  [Re-inventing the Forest Service] <https://www.fao.org/3/ai412e/AI412E06.htm>
-  [Forest Service During the Anthropocene] https://www.evergreenmagazine.com/assets/Anthropocene_A-FS-for-the-Future_MASTER-revised-2.0.pdf
-  [Timber Industry] https://www.oregonencyclopedia.org/articles/timber_industry/
-  [Western Wood Processing Facilities Map] <https://forestpolicypub.com/2011/11/05/western-wood-processing-facilities-map/>
-  [Trends in Lumber Processing in the Western United States] https://www.researchgate.net/publication/275560708_Trends_in_Lumber_Processing_in_the_Western_United_States_Part_II_Overrun_and_Lumber_Recovery_Factors
-  [Investments in Wood Processing Innovations] <https://www.fs.usda.gov/news/releases/usda-announces-43-million-investment-advance-innovation-in-wood-products>
-  [Northern Spotted Owl] https://en.wikipedia.org/wiki/Northern_spotted_owl#:~:text=Harvests%20of%20timber%20in%20the%20Pacific%20Northwest%20were,harvests%20and%20automation%20of%20the%20lumber%20industry.%20
-  [Mapping the Timber Industry Boom in 2021] <https://www.archpaper.com/2021/04/2021-timber-map/>
-  [Wood Products Infrastructure Assistance Grants] <https://www.fs.usda.gov/science-technology/energy-forest-products/wood-innovation/wood-products-infrastructure-assistance-grants>
-  To be added, as needed.

Relevant Documents and Emails. The following are selected relevant documents and emails that will augment the need for renewed infrastructure in wood processing to help address expanded forest maintenance and the associated reduction in damages to property and lives lost from unplanned wildfires:

Document No. 1. *Catastrophic “reburns” threaten forest towns* by Roger Jaegel, Director of the Hayfork Fire Protection District and lives in Hayfork. Published in the Redding Record Searchlight, Speak Your Piece, 2004.

Catastrophic “reburns” threaten forest towns

It is time to redefine the political debate about salvage” of fire-killed trees. The fighting is about doing the economically responsible action,” i.e., using fire-killed saw timber and recovering economic value or leaving the land alone and letting it naturally recover. Nothing is natural about the current fire threat to Western families left with the remains of a forest fire on the edge of their community. The threat is very real and not just a debating point.

The debate, currently masquerading as environmentalists versus forest industry, and focusing on the commercial use of killed trees, ignores hard realities. It prevents more important dialogue and the opportunity to discover common ground. We must elevate the dialogue and get some help solving a huge fire threat in the Klamath-Siskiyou Mountains of Northern California and southern Oregon—the fire next time.

When fire-killed trees are not removed and the area is not replanted, fuel loads of up to 150 tons per acre (over 50 tons is considered a fire risk) stand at the edge of our town. Over the years the brush grows up around the standing dead, dying and drying trees.

When the fire burns through the next time, the results are terrifying. The fire is extremely hot. Dead trees burst into flames 20 yards from the flame front. Brush 20 feet high blocks firefighters’ access. Retardant slurry is totally ineffective against the snags that have no branches to catch it. The fires are extremely resistant to control and an extreme danger to firefighters.

We experienced this during the Prairie Fire in 2002, which was a reburn on an untreated portion of the Flume Fire of 1987. The fire reburned so hot the ground looked like a moonscape. In the past six years we have seen big, stand-destroying fires burn to the edges of our town. The Big Bar Complex in 1998, the Journey Fire above Ruth and Ruth Lake in 2000, The Hyampom Fire next to Hayfork in 2001, the Loma and Reys Fires next to Del Loma and Hyampom in 2003, and the recent Sims Mountain Fire.

Most fire-killed trees are still standing and the brush is coming up. The reasons for the lack of reforestation are varied: environmental lawsuits, lack of planning dollars, deterioration of the commercially usable trees, etc.

The scary part of this increased risk is that it will last for 50 years and end in a raging fire. This happening at a time when the volunteer fire departments are short on manpower and resources. Add to that the hard reality that our fires generally start late in the season, when there are fires in other parts of California. Four times since 1987, large fires in different areas of the West have overwhelmed suppression resources. The agencies moved into “triage,” and high-population areas have priority. They do not come to Trinity County.





When burned areas next to our towns are not cleaned up and replanted, our risk exceeds the tolerable limit. We have five towns in this condition now. If we do not move very quickly to recover the value from the fire-killed trees, then we have not money to clean up the damage and replant the forest. We all need to ask the Forest Service and our neighbors to quickly deal with

this danger. When the public debates turn to “salvage” and the accusations fly, please remember to ask about the fire next time.

Email. On Nov 7, 2023, at 11:44 AM, rjaegel7@gmail.com wrote: Infrastructure is indeed a problem but after the 2008 fires many asked why we were not exporting some of the more valuable wood to markets that existed then and still do today. The biggest obstacle then and now is the politics of the environmental movement and their refusal to give up on failed, destructive, evil , controlling policies and agendas that will ensure our forests are converted to brush in the shortest possible timeframe. If any of you have the book “In A Dark Wood” by Alston Chase you should read it. I think he had it right in the mid 1990’s.

Email. November 8, 2023, at 11:21 AM, billlecfm@me.com wrote:

Michael and All: Another thought. As appropriate, would be nice if we could crank in some attainment targets that the USDA Forest Service would be expected to meet and/or report on, on an annual basis. Such things as:

-  Volume of hazardous fuel removal by acre after a wildfire [salvage & other]. Including total wildfire acres versus acres undergoing removal operations.
-  Total timber board feet harvest versus a 9 BBF goal.
-  Rx target versus attainment.
-  Increased workforce attainment by skill sets.

No doubt there are other targets & the above could be better described. What’s needed is a means of measuring adherence to legislative direction & ensuring that the Forest Service is accountable for failure to comply with Congressional direction and meet established targets.

Email. On November 9, 2023, rjaegel7@gmail.com wrote:

Bill,

S.2867 has some good reporting requirements for mechanical thinning and workforce development. We should also include targets for sustainable renewable energy including any uses for biomass. A target for reduce pm 2.5 particles for improved health and reduction of greenhouse gases both in the wildfire and the rotting dead wood after the burns would help make the point.

Document No. 2. *North State Needs to Fix Forest Fuels* by Roger Jaegel, Speak Your Piece, August 3, 2008. See following page.

North state needs to fix forest fuels

BY: Roger Jaegel

POSTED: 12:00 AM, Aug 3, 2008

TAG: speak your piece (/topic/speak+your+piece)

Trinity County has been under a pall of smoke for more than 30 days. Contrary to popular media, the slew of lightning strikes that started over 100 fires is neither unique nor unprecedented. They've been here before; they will be here again.

The people of Trinity County and indeed most of the counties of Northern California have petitioned the federal government again and again over the past 20 years to thin the brush and crowded trees, build the fuel breaks, clean up after the fires, and help create a safe, sustainable forest. Our local elected officials have pleaded with our congressmen and senators to help us get sustainable management back in place in the forests we love. We have cited science and our experiences until we are blue in the face.

It's past time to create a wildfire strategy for Northern California. It is past time to face the effects of wildfire on the condition of our health, our forests, our future.

Our productive forests are being converted to brush. The evidence is these frequent and fierce wildfires. Each year these wildfires are emitting millions of tons of greenhouse gases and worsening global warming, destroying thousands of acres of important fish and wildlife habitat, sending sediment into our clean water, and leaving hundreds of tons per acre of fire-killed trees and brush on the forest waiting for the next firestorm when that dried out wood will burn up the very soil.

The north state needs help. We must ask the San Francisco Bay area environmental groups and our governor to help craft a saner forest policy for California. We must move this issue out of the partisan arena that has trapped it for over 20 years.

California is leading the nation in carbon accounting practices. Wildfire accounts for over 30 percent of global greenhouse gas releases.

This current firestorm in California will release over 70 million metric tons into the air (equal to 11 million passenger cars running for a year). Recent studies of the Hayman, Rodeo-Chediski, Biscuit and Marshall fires suggest that prior thinning could have reduced carbon dioxide release from live tree biomass in those fires by as much as 98 percent. (Hurteau, Koch and Hungate 2008). Studies out of South Carolina University have shown that strategic fuels reduction activities could reduce fire suppression costs in two ways: 1) containing and controlling fires within small land areas and 2) maintaining a private sector work force for quick emergency response.

Norm Johnson and Jerry Franklin, two of the nation's most respected forest ecologists, testified before Congress in December regarding the fate of "dry mixed-conifer and ponderosa pine forests with a frequent fire history." The direct quote is, "We will lose these forests to catastrophic disturbance events unless we undertake aggressive active management programs. ... Without action, we are at high risk of losing these stands - and the residual old-growth trees that they contain - to fire and insects and the potential for these losses is greatly magnified by expected future climate change." The science is in. Now the work on the ground has to begin.

The conversion of California's forests to brushfields is not inevitable. There are alternatives. Fire is simple. Heat, fuel and air. Eliminate one and the fire stops. Nature governs the heat and air. Man can affect the fuel. Governmental policy affects man. And so far, that policy is failing us and the forests we love.

Roger Jaegel is a Trinity County supervisor.

http://www.redding.com/subscribe?utm_source=redding&utm_medium=article&utm_campaign=subscribe

Email. On November 7, 2023, Bill Derr at billlecfm@me.com sent an email message regarding Infrastructure vs. Wildfire. The email stated:

"...Gentleman: So, what are your thoughts on drafting a BILL titled "Sustainable Forest Maintenance" or a more suitable title, as outlined in my 11/7, 10:28 AM email below?

The BILL would be all inclusive and incorporate related current and pending legislation. Also, include budgetary requirements and appropriations to implement the direction in the BILL. Information and data in the "A Call to Action" and the [pending] NWI [National Wildfire Institute] letter to Congressional Committees would be used to cover all aspects of the direction & resources needed in a BILL designed to create a "Sustainable Forest".

It’s one thing to merely distribute the “Call” and “NWI letter” and ask for general support. However, we should also lay out specific details, including funding needs, in an all-inclusive BILL that requires the USFS [Forest Service] to protect and manage the National Forests in a manner that ensures the delivery of valuable goods and services to the American people in perpetuity. [Perhaps] an updated “Organic Act”.

The American people deserve doable solutions to the current wildfire and natural resource crisis. The USFS requires Congressional direction and the full range of workforce and financial resources to comply with legislative direction that provides solutions to the wildfire and natural resource crisis.

In short, we not only need lead these horses to water, but, compel them to drink our Kool Aid and reject the Naysayers fake Kool Aid.”

Email. On Nov 8, 2023, billlecfm@me.com wrote:

Michael and All: With Government spending and the National debt over the top, we need to make a compelling case to Congress and the Administration to justify a three billion \$ increase in annual funding over the next 5 to 7 years. Not to mention Gaza etc. and our internal political turmoil. Can we summarize the related key facts and figures from the “Call” and Micheal’s email here to create an introductory statement for a Draft BILL that includes \$’s needed and specific direction to the USDA/USFS on the required actions that must be taken to restore the National Forests to a healthy and productive state?

A response by Michael T. Rains at mtrains7@verizon.net on November 8, 2023:

Bill:

By the Way: The cost for expanded forest maintenance on public lands is +\$3.72 billion per year for the next 5-7 years [including the 3.18 percent inflation adjustment] to show real change in forestland resiliency [page 28 of *A Call to Action*]. Then, the costs of fire suppression will begin to decline. Then, forest maintenance costs can decline to about +\$2.34 billion per year for the next 5 years. Clearly, we need to think in terms of a decade-long plan with important increases in forest maintenance funding. To be absolutely clear, the USDA Forest Service does not currently have adequate funding in their budget to address forest maintenance needs. This is why nothing changes except the increased expenditures in fire suppression.

Perhaps you recall, I wrote this message on October 31, 2023:

“...There are three primary reasons for the horrific destruction due to unplanned wildfires over the last 15 years, especially. And it’s a tie for the top spot. See page 15 of “A Call to Action.” I don’t spend a lot of time quibbling about the top three. But we better address these three, for sure. The lack of care [i.e., maintenance; management] for our forests [forest are more than just trees] is clearly a major culprit. We all know this. Right now, just for the USDA Forest Service, the annual budget to effectively address this issue is about \$3 billion short. Yes, \$3 billion. Yet

we seem okay with spending +\$1 million/hour fighting fires with absolutely no end in sight. Annual damages from wildfires are approaching \$1 trillion [About \$900 billion²³⁹]. Let’s do the math. What would +\$3 billion/year for the next 5-7 years contribute to reducing suppression costs *and* damages? Clearing more than \$3 billion/year beginning in years 6-7; it’s not even a close call. I have found myself not debating the “top three” reasons any longer. I just wish we could band together and be an influencing force to effectively address this national emergency. Properly coalesced, we certainly have the position power to do exactly that.”

My key point: Constantly focusing on suppression tactics and never on land maintenance — as we [America] is currently doing — is a fruitless proposition. We must change. A very small step toward success would be the annual Chiefs Letter of Intent for Wildfire. Currently, it allows any incident leader to do as she/he wishes. OMG, what a debacle.

And Then in a More Recent Email: So, all I am saying is, for NOW, until the forests are in a better condition to accept fire as a maintenance tool, let us have an objective to put all fires out immediately. Then, when the forests [forests are more than just trees] are more accepting [become more resilient], we can and should use fire, under prescription, to meet resiliency objectives. Yes, this will take time. But like our former Chief, F. Dale Robertson often said, “...the Forest Service is in it for the long haul.” The Chief’s annual Letter of Intent [LOI]for Wildfire for 2024 would be a grand step forward if the letter included the aforesaid objective [i.e., a clearly stated objective to put all fires out immediately].

Therefore: I think you [Bill Derr] have [has] a great idea about crafting a cohesive piece of legislation. I am sure willing to help to the best of my abilities.

Be safe and well, please.

Very respectfully,

Document No. 3. See Appendix A.44, page 183, *The Burning of Ruth*.

Appendix A.42. Interagency Agreement to Address Risks from Fire and Smoke

Biden-Harris Administration Agencies Sign Interagency Agreement to Address Wildfire Risk and Protect Communities from Smoke

WASHINGTON, Nov. 9, 2023 – Today, Agriculture Secretary Tom Vilsack, Environmental Protection Agency Administrator Michael S. Regan, Secretary of the Interior Deb Haaland, and Director of the Centers for Disease Control and Prevention Mandy Cohen announced a Memorandum of Understanding (MOU) to further their joint work to protect communities from the impacts of wildfire smoke, while promoting land management practices that reduce the risk of large, severe fires. The four agencies – the U.S. Department of Agriculture (USDA), the Environmental Protection Agency (EPA), the U.S. Department of the Interior (DOI), and the Centers for Disease Control and Prevention (CDC) – also released a joint plan outlining wildland fire-related priorities the agencies will focus on over the next two years.

“Since fires and smoke don’t recognize borders or jurisdictions, neither should we, and this agreement will help agencies under the Biden-Harris Administration better protect the people and communities we serve,” **said Agriculture Secretary Tom Vilsack.**

“From coast to coast, the nation is facing a growing threat of wildfire induced by climate change, including from the smoke that can harm people hundreds of miles away,” **said EPA Administrator Michael S. Regan.** “We can have a bigger impact on protecting people by partnering across the Biden-Harris Administration. “With today’s interagency agreement we commit to urgent action to reduce the risk of severe wildfires and dangerous smoke.”

“This year has shown the entire country and the world that wildfires don’t stop at a state or country line – they impact all of us and require a coordinated and collaborative approach,” **said Secretary of the Interior Deb Haaland.** “The Biden-Harris administration is committed to using every tool available to protect communities from the hazards of wildfire smoke, while also ensuring we have the tools we need to reduce the future risk of large, high severity wildfire events.”

“The increasing frequency and magnitude of wildfires pose an ever-growing threat to the health of the American public,” **said Mandy Cohen, M.D., M.P.H, Director of the Centers for Disease Control and Prevention.** “This MOU demonstrates the U.S. government’s commitment to mitigating the negative health consequences from wildfire smoke and is a pledge to protect health by reducing the risk of future, large-scale wildfires.”

The MOU outlines how the agencies are working together to advance public health preparedness, minimize smoke impacts to the public and ensure regulatory pathways under the Clean Air Act accommodate greater use of prescribed fire. Under the MOU, the four

agencies commit to coordinating the implementation of policies, communications, and programs that relate to the use of prescribed fire to benefit restoration of forests and other wildlands, and protect communities. The agencies will work together to reduce the negative health impacts of smoke on human health and community well-being.

The joint workplan outlines areas of focus for the agencies’ partnership for fiscal years 2024 and 2025:

- community preparedness;
- ensuring that land management and public health goals are addressed together;
- data collection and sharing; and
- interagency communication and messaging.

The MOU and workplan follow the recent Wildland Fire Mitigation and Management Commission Report to Congress, which urged an “all of the above” approach – at all levels of society – to address the impacts of wildfires on communities across the country. While many of the Commission’s recommendations focus on actions Congress must take, this MOU represents a major step forward to the report’s vision of greater coordination and collaboration among agencies working on wildfire.

This work complements the historic investments from President Biden’s Investing in America agenda to increase the resilience of lands facing the threat of wildland fires and to better support federal wildland firefighters. The Bipartisan Infrastructure Law includes \$3 billion for the USDA and \$1.5 billion for the Department of the Interior to invest in preparedness, fuels management, post-fire restoration, and fire science – all of which will help strengthen long-term fire preparedness, reduce fire risk across states, and invest in our wildland firefighter workforce.

To read the MOU and the joint workplan, visit: [Memorandum of Understanding Between USDA/DOI/EPA/CDC](#) (PDF, 1.2 MB)

To read the Wildland Fire Mitigation and Management Commission report, visit www.usda.gov/topics/disaster-resource-center/wildland-fire/commission

USDA touches the lives of all Americans each day in many positive ways. In the Biden-Harris Administration, USDA is transforming America’s food system with a greater focus on more resilient local and regional food production and fairer markets for all producers. USDA is dedicated to ensuring access to safe, healthy, and nutritious food in all communities, building new markets and streams of income for farmers and producers. In order to reach these goals, USDA encourages the use of climate smart food and forestry practices. USDA is making historic investments in infrastructure and clean energy capabilities in rural America and is committed to equity across the Department by removing systemic barriers and building a workforce more representative of America. To learn more, visit www.usda.gov

Appendix A.43. Dialogue by Conservation Icons: Aune and Quintanar²⁴⁰

Email. From Ray Quintanar, q9er9er@comcast.net, November 4, 2023, to a number of selected contributors. Phil Aune had an excellent extended reply to Ray’s email. The dialogue must not be “lost.” Thus, I²⁴¹ decided include this dialogue as an Appendix item. In the future, I will do the same, so words from conservation icons do not get lost in the wind. This dialogue is as follows:

Quintanar. Hello, I just finished going through the monster [Commission report](#), and recently the “Rains” report [aka, *A Call to Action*]. While I have issues with both, I’ll only address the subject “Beneficial fire,” in the Commission report. With 36 years as a professional wildland firefighter, it doesn’t make me an expert, but it does give me a sound foundation as to the basis for my opinions.

Note: The following is the specific dialogue with Quintanar’s points and response [in blue] by Phil Aune:

Aune. Ray, thanks for re-sending your excellent article. I have also sent this response on to Bill Derr, Ted Stubblefield, Jim Petersen, and Michael Rains who have been actively supporting many of the concepts you have articulated. I have embedded my comments in blue text in your numbered paragraphs:

1. **Quintanar.** I fully support the use of prescribed. The report shows only 0.8 % escapes of over 16,000 planned prescribed fires. This reflects the many steps and oversight needed to plan and implement such a project. To be successful requires a committed inter-disciplinary team in many fields of expertise to monitor both short- and long-term effects of such a project. Of course, this all takes time and isn’t going to be done on the spur of the moment.

Aune. So do I fully support the use of Rx Fire. Your comments on the stats and oversight needed are right on. Here are a couple of addition emphasis points:

1. Full complaisance with NFMA Planning requirements for forest plans and full compliance with project level NEPA planning.
 2. Like all other management activities on NF land, complete monitoring and evaluation of results. While there may be monitoring of weather and fire data at the time of ignition, it is my experience that there is very little post RX burn monitoring and evaluations. Especially in terms of fuel loads before and after the burn. If done, they are generally superficial at best and have limited utility as to what happens to fuel loads 5 and 10 years after treatment. As required example, a simple reforestation job requires mandated first- and third-year survival exams. Most require subsequent treatments until the trees are "free to grow." Seems like we need similar requirements for Rx burns.
2. **Quintanar.** I do not support monitoring fires, or “managed fire” caused by lightning, having spent 2 years planning and implementing such a project on the Colville years ago. While monitoring lightning fires for 2 seasons, the conclusion was, if prescribed fire is needed for all the right reasons, plan and implement. Monitoring unplanned ignitions takes time and money that could well be used for other projects.

Aune. Agree again. Using managed fire "for resource benefits" has been a euphemism for what the public calls "let burn." It is not just being used for lighting fires, but has become the major fire suppression strategy. Even the Chief [USDA Forest Service] recognizes the problems of acceptance by the public. As an example, he specifically requested NAFSR's assistance in helping to improve the public's understanding of Managed Fires. Unfortunately, the Public definitely understands what is meant and what is being used as "Managed Fire." Especially those that have been burned, by such recent use. Simply putting "lipstick on a pig" is very difficult by those who have been adversely affected and those who are worried about me being next. With the Rx fire problems in New Mexico, the use of Managed Fire is also starting to affect the proper use of Rx fire. Finally, as a former resource manager who has observed the misuse of this practice, such use has turned our wonderful National Forests into National Brushfields for the next 75 to 100 years and doomed them into a repeated cycle of heavy fuel load reburns.

3. **Quintanar.** I support the triage process during episodes of multiple starts, to determine which fire(s) will be attacked first second and so based on agency and regional standards, such as threats to life, property, and other factors such as critical resources.

Aune. There is a long history that supports the effective use of the triage process and the much hated "10 AM" Policy by those who advocate the use of "Managed Fire for Resource Benefits."

4. **Quintanar.** With the trend of much warmer weather patterns in the last few years, low fuel moistures, low humidity and drought conditions over longer periods allowing a small fire to continue to burn, because "it is in a remote area and isn't going anywhere, or is difficult to get to, has been proven to be a disaster in the making and is no longer acceptable." Let it burn" or" monitor" without limitations is no longer acceptable. For example, a small fire in a remote area occurs and pre-defined limitations are that it will be fully suppressed should it exceed 2 acres, using best resources to access the area, such as jumpers, rappellers or ground crews.

Aune. Agree, 100 percent and well stated!

5. **Quintanar.** I do not support "the objective of wildfire for resource management", that is burning out additional acres during a full-scale wildfire in full suppression mode, the extra burned acres to be labeled as fuels-acre treatment (burned acres) accomplishment, none of which is necessary for direct suppression, such as firing out to protect life, property, other resources, to contain or slow down a fire, to create safety zones. This change in direction makes a complete mockery of the planning and oversight required in preparation and implementation to accomplish prescribed burn projects, as well as to some of the recommendations in this report. The science and technology required to meet the ever-growing challenges of effectively finding better ways to protect, sustain and enhance our natural resources is not to be found in the resource for management objective. To add additional acres to "fuels reduction targets", during this extreme warming phase adds unjustified risk to those directly involved as well to the natural resources involved.

Aune. Letting fires burn for resource objectives requires NFMA Forest Planning before utilization with full public involvement as I stated earlier. Especially, exactly where, under what conditions, what are the project environment, social and economic consequence and with all the necessary regulatory requirements clearly spelled out in advance of the use. Liability discussions should be clearly displayed so that the neighbors can clearly see what to expect when (not if) the fire escapes and burns their property. Those that play with fire should pay for their adverse consequences. After all, the USFS now clearly supports the Good Neighbor Policy and I assume that means also accepting the liability.

6. **Quintanar.** How is cost, such as that of holding fire crews who may be needed elsewhere as well as their logistics support. tracked as to what goes to fuels and what to suppression? Any stats as to escapes that have occurred from added acre operations within the 20-million-acre jurisdiction of the forest service in R5, or assessed damage that has occurred as the result of escapes caused by this new direction?

Aune. Great question.

7. **Quintanar.** Final comment. The combination of reduced incident management teams, available forest service personnel to fill critical team slots, significant shortage of firefighters, the many uncompleted forest management plans ,with no required hazard mitigation plans, all under the umbrella of significant warming trends, are reason for me to believe more escapes from this new direction will occur than presently occurs under the present prescribed fire program.

Aune. A comprehensive "Call to Action" and the funding *plus* personnel necessary is required. Blue Ribbon panel discussions and subsequent papers will not do the task. Simply read all of the previous "Blue Ribbon" papers that have been published in California. As an example, see the one that Governor Schwarzenegger initiated shortly after he took office and also look at the previous ones to that precede that report. That is just in CA. Imagine how many other "Blue Ribbon" papers on the subject of wildfires have been put together. Meanwhile the National Forests and private land within continue to burn at ever increasing rates annually until this last burn year.

8. **Quintanar.** If I have interpreted this new direction incorrectly, I'm sure I will be corrected. And, no I haven't joined the Sierra Club.

Aune. If you had been a member, you would now be an ex-communicated member.

9. **Quintanar.** My 2 bits...Q.

Aune. Plus, mine! Phil.

Appendix A.44. The Burning of Ruth, California, August Complex, 2020²⁴²

Burning Ruth: The Questions of August



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Editor’s Note: Evergreen colleagues and wildfire experts, Roger Jaegel and James Montgomery have cowritten a thoughtful and penetrating essay in which they ask some long overdue questions concerning the wildfire pandemic the grips the 11 western states.

Although their essay focuses on Ruth, a small northern California town leveled by the 2020 August Complex fire, the scenario they describe could unfold anywhere in the West. In fact, the scenario repeated itself last summer when the 963,000 acre Dixie Fire destroyed Greenville, another small northern California community.

You can watch Mr. Jaegel in action in a very instructive video currently posted on Facebook

By Roger Jaegel and James Montgomery

The burning of small towns has become a sort of New Age ritual. Like fair maidens chained as offerings to dragons, small towns of the forest wait in the path of gigantic wildfires, helpless. Like knights errant, valiant firefighters stand between them and the flames. But sometimes the defenders fail. Greenville, Paradise, Grizzly Flats, Concow, Keswick, Magalia, Pulga, Doyle, Detroit, Blue River, Vida, Phoenix, Talent, Elkhorn, Gates, Idanha, Mill City, Lyons, Malden, Canyondam, Bagdad, Los Alamos, Ruth. All burned.

This is the story of Ruth. It is a story filled with questions.

The August Complex was a group of fires resulting from 38 different lightning strikes in Glenn, Lake, Mendocino, Shasta, Tehama and Trinity Counties. Eventually, these fires merged together to become the biggest wildfire in the United States since 1910. This fire was monstrous, with many aspects. The aspect we are looking at concerns the South Fork Mountain and Ruth.

On September 26, 2020, the Forest Service Alaska Incident Team dropped incendiary devices, known as "dragon's eggs," from a helicopter to start fires on South Fork Mountain, in Trinity County. They started fires on Rattlesnake Ridge and other ridges above the small town of Forest Glen. They called this a "defensive burn."

The day after the Alaska Incident Team started their fires, a major "wind incident" occurred. Winds of over 30 miles per hour came roaring in from the northeast and blew these fires up. They burned over South Fork Mountain, across Ruth Lake, and swept over the little community of Ruth.

Ruth is spread out along Ruth Lake. A lake is a pretty good fire break, but the fire jumped the lake, apparently in several places. Some houses were burned, and some, right next door, were spared in a mosaic of destruction.



Ruth Community Church Parsonage

The thing is, the Forest Service knew the winds were coming. They were predicted several days ahead of time, by the National Weather Service and other weather reports. The [USA RAWS Climate Archive for the Mad River Station](#) shows that winds of 33 mph were predicted for September 27, and 38 mph for September 28. So, then, did the decision-makers for the Alaska Incident Team not consult the weather reports? Or did they just not care? They *knew* a major windstorm was coming!

These are disturbing questions. Many more questions arise:

- Who was responsible for the decision to light these fires? An individual should be held accountable, if the decision was negligent. If it was intentional, they should be held legally responsible.
- Is this a pattern? A fire is stable, somewhat contained, the day before a predicted high-fire-danger day, and the Forest Service lights a fire that takes off the next day. Is there a group within the Forest Service that is working to expand the conflagrations? Is this agency policy?
- Is there an attitude of "let it burn" in the Forest Service? There is. They call it "managed fire." They think they will improve the forest by letting fire clear it out. This is almost a religion among many so-called "environmentalists." They think fire is good for the land, and believe in letting the burned timber stand, rather than logging it and replanting.

- Will the South Fork and Ruth Valley burn again in another decade or so? Are the dead trees being removed, and the area replanted? Or is the dead timber simply being allowed to rot? acres of timber burned. That gives us 5 *billion* board feet of lumber. At 6.3 board feet per square foot of house, a 1600 square foot home requires about 10,000 board feet of lumber. The August Complex burned enough timber to build at least 500,000 houses.
- In 2020, California had about 160,000 homeless people. The August Complex burned enough timber to build three houses for each of them, if the timber were harvested. Is it being harvested, now, or is it being left on the ground to fuel future fires? Historically, less than 10% of the dead timber on public land has been salvaged.
- How much carbon was released into the atmosphere? In 2020, over [4 million acres](#) of timber burned in California, emitting [60 million tons](#) of carbon dioxide. By way of comparison, all of California's transportation sources- automobiles, trucks, trains and planes- put together produce about 200 million tons of CO2, annually.
- Why do environmentalists who claim to care about climate change not care about this? Why is the public not informed of this? Who controls the media?
- Who gains from these fires? Some people are making enormous amounts of money. In 2020 alone, the Forest Service spent \$1.6 billion on firefighting. A lot of that money goes to contractors and providers, all of whom have a vested interest in keeping the fires burning. Fires make great material for the news media. When a town burns, even the city people pay attention to the news. Horrifying tales of people being burned alive en masse on asphalt highways keep people glued to the TV.

Fire Descending on Ruth



A Modest Proposal to Save Our Towns

We know how to protect buildings. Defensible space. Rural homeowners are required by law to keep 100 feet of area around their homes cleared of burnable debris. Why not extend this concept to the level of communities?

All areas within a 5 mile radius of specified rural communities should be designated as *defensible space*. Defensible space is defined as an area cleared of readily flammable materials, such as dry brush, dead and dying trees, too-closely-spaced trees (thickets) and woody debris above the diameter of 3 inches.

The purpose of defensible space is to slow or stop the spread of wildfire, and create an area which can be defended against wildfire. Communities deserve this protection. The goal is to create park-like areas of open fire-resistant timber, green grass, or other fire-resilient vegetation.

The way to achieve this is through thinning and removal of flammable brush, removal of coarse woody debris by mechanical means, prescribed fire when conditions are entirely safe (winter), removal of dead and dying trees (which could be used for lumber), and thinning of closely spaced trees.

The biggest obstacle to achieving defensive space on a community level is interference by the rich and powerful environmental non-profits, whose lawyers use the Endangered Species Act to stop forest management. To protect our towns, we need legislation to amend the ESA to provide for enlightened forest management within the designated areas.

If lawsuits are filed, responsible forest management must be permitted to proceed, pending the outcome of the lawsuit. The stranglehold of the lawyers must be broken, if we intend to save our small towns. On the other hand, maybe we should just let them all burn, to the feed the dragons. After all, dragons are an endangered species, too.



Ruth Community Church Parsonage, now



Appendix A.45. First Put Out the Fire: Blowtorch Forestry²⁴³

Managing “Unplanned Fire”: Expert Advice and the Decimation of Our National Forests
December 8, 2023 by Bob Zybach [Posted in “The Smokey Wire: National Forest News and Views”]

Smog the Golden! Mythical Pyrodactyl, aka “Smokey Dragon”
[Frank Carroll, PFMc]

The following interview by Jim Petersen with Frank Carroll is nearly 2800 words long — which is kind of excessive for this forum but well worth the read for anyone who hasn’t done so already and is concerned with USFS wildfire history, politics, and economics over the past 35 years.



The interview is nearly four years old, but has just been republished in the current issue of *Smokejumper* magazine by editor Chuck Sheley and is a slightly abbreviated version of Petersen’s April 2020 publication in *Evergreen Magazine*: <https://www.evergreenmagazine.com/blowtorch-forestry/>

Despite the interview’s age, it remains directly relevant to current discussions regarding the great cost, visual and air pollution, wildlife mortality, and damaged rural economies resulting from continuing practices of the modern US Forest Service — what Carroll refers to as the “New Wildfire Economy.”

In 2020, then-USFS Chief Vicki Christiansen’s directive was: “Using unplanned fire in the right place at the right time.” Today, current-USFS Chief Randy Moore says he is “pleased to report that we have made significant progress in implementing this daring and critical strategy,” and talks about “using” fire on a “record 1.9 million acres as a method of reducing hazardous fuels.” If that is the objective, then much safer and cheaper methods of reducing such fuels — and even showing a taxable income while doing so — were demonstrated over hundreds of millions of acres in the 20th century and continue to be effectively used on private, state, and Indian lands to this time.

According to Carroll, the “New Wildfire Economy” has become “big business” for the USFS, “effectively replacing traditional forestry practices with unfettered wildfire tending.” This is presented as the difference between producing tax revenues for the government while creating needed local jobs, safe and beautiful environments, and maintaining abundant and diverse wildlife populations vs. using taxpayer dollars to economically bankrupt our rural forest economies, killing our wildlife, and replacing the once beautiful landscapes with a sea of ugly and dangerous snags. Not in those words exactly, but documented factual outcomes.

Sheley, Petersen, and Carroll are all experts regarding the responsible treatment of “unplanned fires” and the consequences for mismanaging them. Petersen’s book on the topic and Carroll’s qualifications are described in the interview and Sheley’s introduction:

Chuck Sheley: I found Jim’s interview of Frank Carroll, a Colorado forester and wildfire expert, to be educational and informative and something the readers of “Smokejumper” magazine would find interesting. Jim’s book, “First Put Out the Fire,” leads off the discussion. This interview is from several years ago, and during COVID, but very relative to what is going on today. I’ve shortened the word count to make it fit in this issue. Reprinted with permission [Chuck Sheley, Editor, Smokejumper Magazine, Quarterly, January 2024, page 7]. See also Appendix A.24, page 96 of this *A Call to Action*.

Jim Peterson: I’ve yet to hear from anyone who thought my book wasn’t “a good read,” but Frank Carroll, a colleague of 20 years, thought I stopped the wildfire discussion 20 years too soon.

Frank was Public Affairs Director for Potlatch Corporation’s Eastern Region when we met in 2000. Today, he is the Managing Partner in Professional Forest Management (PFM), a Pueblo, Colorado, firm that does trial work with clients whose private forests have been overrun by “managed fires” that began on adjacent Forest Service land.

Frank wrote: “I just finished your book and have to say I have high hopes for your book. I thought you would step above the old swamp and take on the biggest gorilla in the room, ‘using unplanned fire in the right time and the right place’ to ‘reintroduce fire to fire depleted ecosystems’ as Chief Christiansen put it in her directive to the troops last year.”

“Using unplanned fire in the right place at the right time” appears in a note Forest Service Chief Vicki Christiansen sent to her line officers last year. It is a thinly veiled reference to “managed fire,” or applying wildfire like prescribed fire, in a directive agency fire crews are expected to follow whenever the opportunity to let a wildfire run presents itself. There are few places outside of designated Wilderness areas where this can be done safely, but the practice is used widely across the Western National Forests as a matter of policy. Certainly, nowhere near communities, municipal watersheds, or fish or wildlife habitat critical to threatened or endangered species, and, yet, it is precisely these locations that are increasingly overrun by managed fire.

Some people rejected forestry long ago. State foresters, Interior agencies, and local governments have stayed the course where wildfires are concerned. Put them out as quickly as possible. Hence, the title of my book: First, Put Out the Fire. I write that if we don’t put these fires out, we won’t have anything else to talk about after the smoke clears. So, by all means, let’s talk about a proper role for wildfire in a post-industrial society that depends on its national forests for far more than timber.

Appropriately, timber production has become a by-product of federal policies that favor wildlife habitat conservation. In my opinion, “managed fire” is on a collision course with every forest value our society holds dear, which brings me to what’s bothering Frank Carroll. I’ll let Frank speak for himself in the question-and-answer interview below, but his main complaint is one with which I am familiar— “managed fires” have a nasty habit of becoming unmanageable wildfires that overrun adjacent and well-managed private forest lands.

Petersen: Frank, tell us about your new business venture.

Carroll: Professional Forest Management, LLC, does wildfire impact analysis for law firms and private clients in federal tort claims and legal actions. From a forest perspective, this rather simple aspirational objective—using unplanned fire in the right place at the right time—is the absolute worst development in the history of forests and forest conservation.

Petersen: How so?

Carroll: We are burning our forests to ruin, and we’re doing it on purpose. We got out of the thinning and prescribed fire business on federal land, and now we are in the Age of Fire for Fire’s Sake. I call it “Fire-first” forestry. Federally-funded wildfire crews are burning big boxes around the West and are now responsible for 40 to 60 percent of the acreage burned by any given large fire.

Petersen: And this is managed fire?

Carroll: This is managed fire. National forest supervisors are expected to maximize the management role of wildfire, and they are doing it with a vengeance.

Petersen: This doesn’t sound like good forestry.

Carroll: It isn’t, but it is what’s happening. The 2018 Pole Creek and Bald Mountain Fires in Utah and the earlier Lolo Pass Fire are great examples of the madness of managed fire. We are working on \$40 million in claims on Bald Mountain and Pole Creek alone, and there are many more that will go unchallenged because there is no internal or congressional oversight.

Petersen: What does that mean?

Carroll: It means the USFS is violating the National Environmental Policy Act. These fires are major federal actions with environmental consequences. Where are the Environmental Assessments or the Environmental Impact Statements? They don’t exist. There is no Record of Decision, no public process, no paper trail, no recourse for the public. The agency can operate in complete secrecy without disclosing specific or cumulative consequences. It’s all illegal. You cannot use Congressionally-appropriated fire suppression funds to do resource management except wildfire suppression. If you or I did this, we’d be in jail.

Petersen: Yet from what I’m hearing, “using unplanned fire in the right fire in the right place at the right time” is currently giving way to more timely and direct attack.

Carroll: Congressional delegations from the West forced Chief Christiansen’s hand because of concerns about the impact COVID-19 will have on firefighting this year. She is suddenly in full suppression mode because of the risks the virus poses to crews that work, eat, and sleep in close proximity.

Petersen: I understand that, but how does it undermine managed fire?

Carroll: The virus prevents the Forest Service from operating in complex strategic environments that feature big, intricate burnouts covering hundreds of thousands of acres because they can’t coalesce in one giant fire camp and coordinate all the moving parts. But you can be sure they’ll be back to “using unplanned fire” as soon as possible.

Petersen: Why?

Carroll: First, because they can. It’s a management prerogative they control completely and requires no public oversight or interference from cooperating agencies. Even when cooperators protest, as the State of Utah did in 2018, the Agency moves ahead anyway without consequences. Second, they are strongly pressed by environmental groups like FUSEE and the DiCaprio Foundation to let fires burn. And, finally, fighting forest fires has become big business for the USFS and their firefighting contractors—a hog’s paradise allowing them to spend money like drunken sailors. So, no one realizes what they are doing except the special interests who want them to do it, and an ignorant Congress is giving them limitless money to burn. So, they burn.

Petersen: How do you know all this?

Carroll: It’s our business nowadays. We do the intensive and comprehensive analysis of entire records from large fires. We spend years in deposition and preparing for court and trial. Our sources keep us abreast of new developments in policy and practice in real-time. In its reports to Congress, the USFS is counting wildfire acres burned as acres treated.

Petersen: We’ve heard that before and it has always seemed like a misappropriation of taxpayer dollars.

Carroll: It is. The USFS is using federally appropriated wildland fire management dollars to practice a new kind of wildfire-based resource management that holds that, since we can’t do real natural resource management projects on an ecologically significant scale, we’ll just use wildfire on everything everywhere and call it good enough. Managed fire is the only form of management no one questions. Environmentalists can’t stop them and don’t want to, they don’t need anyone’s permission, and there is no oversight.

Petersen: Real resource management being the thinning and prescribed fire regime that states, private landowners and Indian tribes use perennially?

Carroll: Correct

Petersen: This goes back to my belief that the fault here rests with Congress and its failure to allow the USFS to undertake forest restoration projects on physical scales that are environmentally significant.

Carroll: It’s worse than that. What we have here is a federal forest management agency that can spend whatever it wants in any way it wants with no public input or oversight.

Petersen: Aren't there auditors who go through the firefighting bills?

Carroll: There are, but no fiscal officer in the USFS has firefighting experience. They won't challenge or second guess fire commanders or forest supervisors because if things go to hell, they'll be blamed. This is the new Wild West and Wildfire is the name of the game.

Petersen: Keep your head down and don't mess up.

Carroll: Climate change, fuels equilibrium, growth, harvest and mortality, and reforestation are all yesterday's news. What we have today is a rogue federal agency burning its way into a new bureaucratic empire that is publicly unaccountable.

Petersen: Reminds me of Eisenhower's warning about the dangers posed by what he called the military-industrial complex.

Carroll: That's a good analogy. What we have here is an Industrial Wildfire Complex that is answerable to no one. The Forest Service today is a much different agency than the one that all of us knew for decades. The transition from forestry to fire has rendered every forest plan objective effectively moot.

Petersen: That's a big statement, especially when we consider that this transition occurred in plain view of anyone who was watching. And you worked for the Forest Service, didn't you?

Carroll: In the National Park Service and the Forest Service from 1972 through 2012. I held primary fire, forest staff, and leadership roles in the USFS in Arizona, New Mexico, Idaho, South Dakota and spent time in Washington, D.C. My time since my Forest Service years has been spent in wildland fire mitigation planning and implementation, remote sensing, wildfire impact, and suppression analysis.

Petersen: Based on all your experience, how do we reverse course?

Carroll: Not easily. The Forest Service today is a black box. It is immune to public scrutiny and led by fire officers who are not well-grounded in natural resource management. They have no interest in further fights with smoke regulators or anti-management environmentalists. Why would they when they can burn far and wide, accumulate political power, maintain their Smokey vibe, and enjoy vastly increased budgets in the New Wildfire Economy.

Petersen: New Wildfire Economy. I don't even like the sound of those words.

Carroll: No one should, but it's real and it's here.

Petersen: Some of these big fires burn so hot that they cook the soil. It can take a century or more to rebuild the organic layer in which seeds germinate, so 200 to 300 years to grow a new forest where the old one stood.

Carroll: That’s true and the burners don’t care. They see big wildfires as a natural agent.

Petersen: Better than the thinning and prescribed fire combination I describe in my book.

Carroll: Yes, because the New Wildfire Economy makes it easy. No appeals or litigation. No nasty wild-eyed environmentalists. Just lumbermen who don’t seem to understand the problem or are under too much economic pressure to have any stomach for the fight.

Petersen: So, where is the good news?

Carroll: The good news is that the Forest Service will not go to public trial on these issues for fear of upending their new wildfire hegemony. They are doing their own version of stop, drop and roll so they can stay hidden in plain sight. They will settle every claim out of court, no matter how weak, rather than go to trial and have these issues openly reviewed. This is good for people harmed by these fires.

Petersen: The big issue is the transition from an agency that manages forests to one that favors applied wildfire to every natural resource management objective?

Carroll: That is precisely the biggest issue. It is the issue that has the USFS hiding behind things like 747s that dump fire retardant on fires. It makes great video on the evening news but does nothing to address the underlying causes of these enormous fires or the agency’s decision to favor fire over forestry.

Petersen: We’re told the public is very suspicious of thinning projects that are large enough to actually reduce the risk and size of these big wildfires.

Carroll: Some people don’t like logging of any kind. Others see its value. In our New Wildfire Economy, it doesn’t matter. Welcome to the world of blowtorch forestry.

Petersen: More than half the Forest Service’s annual budget is spent on wildfires. Most people think that’s what it takes to put these fires out. You’re saying the big expense occurs when the decision is made to “manage” the fire, meaning let the fire run rather than put it out quickly.

Carroll: That’s correct. I can show you one 1,600-acre managed fire that cost taxpayers \$12.6 million. The whole idea of firefighting has been turned on its head. The USFS is using crews to light fires on an epic scale, not put fires out. They have no idea what they’re doing or what the implications of using unplanned fire are for the future.

Petersen: Maybe Congress needs to tell the USFS that for every blowtorched acre there will be an acre that is mechanically thinned in combination with prescribed fire. The way it was done for decades.

Carroll: Nice idea but it won’t happen.

Petersen: Why not?

Carroll: Two different worlds. In the blowtorch world, the USFS burns to its heart’s content with no oversight, no need to ask anyone for permission and no lawsuits. In the world of forest and range management, there are laws and regulations, there is oversight and there is litigation. Moreover, the Forest Service no longer has the skill sets needed to plan and execute large scale thinning projects.

Petersen: So, we’re stuck with blowtorch forestry?

Carroll: The Forest Service—and Congress by association—are rolling big dice. They are betting that blowtorch forestry will reset the biological clock in our forests and that they will be able to meaningfully manage the resulting brush fields for the greater good. That’s just a fantasy.

Petersen: Brush fields have overtaken much of the 500,000-acre Biscuit Fire that burned in 2002 on southern Oregon’s Siskiyou National Forest.

Carroll: You haven’t seen anything yet. Blowtorch forestry is creating millions of acres of sorrel monocultures that will burn and reburn and revert to the lowest common denominator, cheat grass and wild oats, like we’re seeing in California. The only way they can manage these newly created brush ecosystems is to keep burning them and the only time they can burn them is in high fire season. So, the blowtorch will be applied relentlessly until the world changes.

Petersen: There are still some dedicated professionals working for the Forest Service. I’m surprised no one has blown the whistle on this racket.

Carroll: I know, but you must realize that the USFS has no intention of returning to its roots. It has embraced wildfire because it’s easier. My partner and I are doing very well in this environment, but it’s so sad to watch.

Petersen: So, if I have followed the bouncing ball to its destination, what you are telling me is that the Forest Service will work harder on initial attack this year because the virus and the western congressional delegation have forced their hand.

Carroll: That’s correct. And because of much better initial attack—and no managed fires—you will see smaller fires this year unless they just let them burn, which is likely because moving armies around will be harder in most cases. But as soon as the virus passes, the Forest Service will go right back to blowtorch forestry.

Petersen: Unless we can find a way to stop them from burning the nation’s federal forest legacy to the ground.

Carroll: I am not optimistic. The forces that gave us a five-fold increase in fire suppression spending will not abate. The current Forest Service Chief is deeply and personally invested in the ascendance of fire management in her agency. The Deputy Secretary of Agriculture over the Forest Service is likewise a fire-first leader and the current Chief’s mentor. There is a fire dragon walking the halls of the Forest Service in Washington, D.C. and it will not be easily dislodged.

Appendix A.46. Keeping the Pinelands [New Jersey]²⁴⁴

Keeping the Pinelands

Our New Jersey forester friend, Bob Williams, recently sent us the link to a PBS documentary titled *Keeping the Pinelands*. He asked us to watch it and tell him what we thought of it.

We think it’s pretty good. It runs 26 minutes and 40 seconds and reflects some solid thinking and writing by a New Jersey film crew that probably didn’t know much about New Jersey forests when they began their work. Kudos to producer, Susan Wallner, for adhering to journalist standards rarely honored today.

Here’s the link. Watch it and see what you think.

<https://www.thirteen.org/programs/nj-pbs-specials/keeping-the-pinelands-4xj8sg/>

Williams appears several times in the film and does an excellent job of explaining that the *only* way to keep the pinelands forested is to manage the state’s forests. The mere fact that New Jersey even has forests comes as a complete surprise to most westerners, but it has about two million acres of forestland that blanket some 40 percent of the aptly named Garden State.

Apples, peaches, apricots and nectarine’s grow here in abundance as do cranberries and blue berries. The state is the nation’s No. 3 supplier of cranberries, behind Massachusetts and Wisconsin.

New Jersey’s principal native conifer species are Pitch Pine, Short Leaf Pine and Atlantic White Cedar. Cedar grows in cranberry and blueberry bogs and swamps close to the Atlantic Ocean and the pine grows in dryer inland environs. Both tree species grow quickly, but encroaching sea water has killed much of cedar.

Williams works with landowners in both inland and coastal areas and has a long history of success with restoring forests that have had little or no management.

One of the most remarkable aspects of the film is the revelation that New Jersey Audubon is a strong supporter of Williams’ use of thinning and prescribed burning to reinvigorate forests that have grown too dense.

Kristen Meistrell, New Jersey Audubon’s Vice President for Stewardship does a good of explaining how Williams has used thinning and prescribed burning to stimulate natural regeneration in grassy habitats that quail prefer. Her studied perspectives are refreshing counter to the dishonest voices of many members of the Oregon Audubon Society.

There is a nice segue to architect Maya Lin, designer of the Vietnam Wall, who teamed with Williams on her *Ghost Forest* display in New York City’s Madison Square Park Conservancy in 2021. The display features standing dead Atlantic White Cedar that Williams secured for her on land owned by one of his clients.

Lin lives in Colorado now and has been quite vocal about the need to thin western national forests before they die and burn. There is an essay [here](#) on our Evergreen website that explains the *Ghost Forest* project.

New Jersey had a thriving sawmill industry for more than 300 years. It’s mostly gone now, so Williams’ logs are trucked as far south as North Carolina. Ironically, there is an old circle saw and a band saw or two that cut cedar used for roofing and siding on homes in mostly gated communities that surround the Pine Barrens.

Citizen-led collaboration has become *the key* to science-based management and the quite admirable revival of New Jersey’s forests. “We have to fight together for the future of our forests,” Williams says of collaboration at one point in the film.

The cast of characters differs in New Jersey, but anti-forestry activists in the Garden State are fighting the same ridiculous political war than has raged in the West for more than 30 years.

Slowly but surely those who have insisted on total control are losing political ground to citizen-led collaboratives that work with federal and state agencies and private landowners to ensure that their forests grow and thrive in perpetuity.

Jim Petersen, Founder and President
The non-profit Evergreen Foundation

Appendix A.47. “Managed Fire” and Litigation [also, see [page 11](#)]

Note: Recently, there has been an aggressive discussion about the use of “Managed Fire” [see page 11 of this document], its impacts, and litigation. I [Rains] wanted to capture some of this very instructive discussion in this Appendix A.47 for future reference. In some instances, I have made very minor edits to help clarify the discussion. To establish a foundation, the following first entry in Appendix A.45 is a USDA Forest Service policy briefing on the relevant subject matter of using “managed fire.” **Except for the “Briefing Paper” below, the entries are *not* in chronological order.**



USDA Forest Service National Fire Leadership Council Briefing Paper

Date: 10/31/2017

Topic: Use of Naturally Ignited Wildfire to Create Resilient Landscapes

Issue: Leaders’ Intent for Naturally Ignited Wildfires

- ❑ **Background:** The vision of the National Cohesive Wildland Fire Management Strategy (Cohesive Strategy) is “*To safely and effectively extinguish fire when needed; use fire where allowable; manage our natural resources; and as a nation, to live with wildland fire.*” To meet the three key components identified by the strategy (Resilient Landscapes, Fire Adapted Communities, Safe and Effective Wildfire Response), the USDA Forest Service’s Chief, Senior Fire Leaders, and National Fire leadership Council have all identified a need to improve the Wildland Fire System. Additionally, the 2009 Guidance for Implementation of Federal Wildland Fire Management Policy (GIFWFMP) encourages the use of wildland fire to meet resource objectives, and states a preference for the management of natural ignitions in meeting the role of fire as an ecological process (pg. 11). The Chief’s “Elevator Speech” (August 2017) included a call to action specifically around the use of wildland fire: “It is time for our agency to make a shift in how we engage and manage wildland fire. Fires are more complex; fire seasons are growing longer and the wildland urban interface is growing. We manage landscapes that have evolved to need fire ecologically. Therefore, we should use risk management principles to help use wildland fire to achieve desired ecological conditions where possible and where it makes sense.”

Key Points:

- ❑ Forest Service leadership acknowledges a need for “more fire on the landscape” (wildfire and prescribed fire) to meet the goals of the Cohesive Strategy.
- ❑ The NFLC has developed a “More Fire on the Landscape” work group, which is currently identifying ways to encourage line officers and fire managers to meet this goal. Some of the

issues/challenges identified include a need for specific training, short/long term planning, social license, and clear Leaders’ Intent.

- ☐ Using naturally ignited wildfires when conditions are appropriate is critical to achieving resilient landscapes in a timely, efficient, and effective manner.
- ☐ There is a consistent theme across Regions/Forests most successful in using naturally ignited wildfires to meet landscape scale restoration goals. That theme is a clearly articulated leaders’ intent around these opportunities. Intentional direction from leadership to line officers and fire management officers expressing an expectation that all naturally ignited wildfires will be evaluated for their potential to meet restoration objectives will incentivize these decision makers by shifting our cultural response to wildfires and demonstrating shared risk upwards.
- ☐ There is inconsistent messaging (and therefore understanding) across regions regarding support for using naturally ignited wildfires to meet restoration goals.

Recommendation:

Senior Fire Leaders should utilize multiple messaging tools to articulate a clear, nationally aligned Leaders’ Intent to employees (especially line officers and fire management officers) around the use of naturally ignited wildfire - when and where appropriate as directed by Federal Wildland Fire Policy - to meet the goals of the Cohesive Strategy. Opportunities exist within the annual “Chief’s Letter”, and/or standalone communication tools at the national/regional level. Utilize the NFLC “More Fire on the Landscape” work group to assist as needed.

Possible Intention Statement:

“Consistent with the goals of the Cohesive Strategy and as directed by the 2001 Review and Update of the 2001 Federal Wildland Fire Management Policy, using naturally ignited wildfires **when and where conditions are appropriate** is critical and encouraged to achieve resilient landscapes in a timely, efficient, and effective manner. To be successful, Regional Foresters will provide intentional direction to line officers and fire management officers expressing an expectation that all naturally ignited wildfires will be evaluated for their potential to meet local restoration objectives. Forest- and district-level decision makers’ actions will establish procedures to evaluate when appropriate opportunities arise and will be critical in shifting our cultural response to wildfires from risk-averse to opportunistic, and will demonstrate a shared commitment to meeting this agency priority.”

Contact: Sarah Tomskey, sarahtomskey@fs.fed.us, Dale Deiter, ddeiter@fs.fed.

The contributors [so far] for Appendix A.47, “Managed Fire” and Litigation [also, see [page 11](#)], following the USDA Forest Service position paper [above] include the listing below:

No.	Name	Focus	Page No.	Date
1	Rains, Michael T.	NOW, conditions for “managed” fire are not appropriate. Put out all unplanned wildfires immediately.	197	02/02/2024
2	Rudd, Valerie	Judge dismisses Tamarack fire case	197	01/26/2024
3	Taylor, Murry	The “back off and slack off” concept has to stop.	199	01/27/2024
4	McMahan, Guy	Forest Service sued for not putting out unplanned wildfire [article].	199	01/27/2024
5	Rhoades, Quentin	An alternate approach to No. 4, above.	200	01/27/2024
6	Rhoades, Quentin	Smokejumper Option and the Tamarack Fire [Text 1].	200	01/27/2024
7	Stubblefield, Ted	Smokejumper Option and the Tamarack Fire [Text 2].	201	01/27/2024
8	Rains, Michael T.	Are Line Officers Aware?	201	01/30/2024
9	Stubblefield, Ted	Smokejumper Option and the Tamarack Fire [Text 3].	202	01/29/2024
10	Weidmer, Curt	A Rebuttal to the USFS's Justification for Letting the Tamarack Fire Burn.	203	01/29/2024
11	Pimlott, Ken	A Timid U.S. Forest Service Response to the Tamarack Fire Put California at Risk.	204	07/25/2021
12	Carroll, Frank	National Forest Plan Amendment to Conserve and Steward Old Growth Forests.	206	02/03/2024
13	Hydan, Sarah	“...Managed wildfire for resource benefit,” Now? Are current forests receptive enough? No, NOT NOW.	208	07/15/2023

START

From: Michael T. Rains [2/02/2024].

“...when conditions are appropriate...”. Well, for NOW, especially in the west, the lands are not ready to accept unplanned wildfires. So, we better put them out quickly. Why is this so darn difficult to comprehend. Three decades of low maintenance and the impacts of a changing climate has made “the right kind of fire at the right time in the right place” incredibly hard to ascertain.

Combined with a drain on skill sets to achieve a determined prescription (not “manage”), makes “...using fire as a forest maintenance tool to augment landscape scale resiliency” almost an impossible task for NOW.

Judge Dismisses Tamarack Fire Case²⁴⁵

From: Valerie Rudd, January 26, 2024 [Kurt Hildebrand / Record-Courier]

A federal judge dismissed a lawsuit brought by 18 Douglas County property owners against the U.S Forest Service over the 2021 Tamarack Fire.

U.S. District Court Judge William B. Shubb for the Eastern District of California issued the ruling on Wednesday. Shubb heard arguments over the lawsuit against the U.S. Forest Service on Jan. 22, according to attorney Bill Jeanney.

The plaintiffs have 60 days to appeal Shubb’s ruling. Filed in July 2023, the \$85 million lawsuit claims the Forest Service was negligent when it didn’t immediately extinguish a fire set by lightning in the Sierra. The Forest Service challenged the lawsuit on the grounds of sovereign immunity.

According to the judge, “the plaintiff’s claim is ‘based upon the exercise or performance or the failure to exercise or perform a discretionary function or duty on the part of a federal agency or an employee of the government.’”

A hiker on the Pacific Crest Trail notified the Carson Ranger District there was a fire on July 4, 2021, according to the ruling.

“The next day, on July 5, the Forest Service published the Tamarack Incident Decision, which set forth its initial assessment of and monitoring plan for the Tamarack Fire.”

The decision explained why the Forest Service chose to monitor the fire instead of suppressing it, based on firefighter safety, resource expenditure and risk of the fire growing.

“Here, the Forest Service clearly faced similar policy considerations before deciding on its strategy to monitor the Tamarack Fire,” Shubb wrote.

Plaintiffs argued that the Forest Service’s inaction was the result of inertia and should be held liable.

However, the judge pointed out that the issuance of the incident decision the next day indicated there were internal deliberations on what to do about the fire.

That decision was posted to the district’s social media page on July 10 along with video of the fire and a statement the fire didn’t pose a threat to the public.

Plaintiffs are also claiming the Forest Service failed to warn them in a timely manner about the threat posed by the fire, which exploded to life on July 16, 2021, growing from 100 acres to 10,000 acres on the first day and sending a huge column of smoke into the stratosphere and flames rushing toward the historic town of Markleeville.

That July 10 post was cited by the judge as an indication that the Forest Service did notify the public about the fire.

"The Forest Service did make a public communication in the form of the information and video posted on its Facebook Page," Shubb wrote. "It is not for the court to second-guess the adequacy of that communication."

By the time the Tamarack Fire was extinguished, it claimed 25 structures and burned 68,696 acres from the Sierra to the Pine Nuts.

The fire shut down Highway 395 through the Pine Nut Mountains for a week after it arrived in Douglas County on June 20, 2021.

Douglas County declared a state of emergency on July 23, 2021.

The lawsuit was dismissed with prejudice.

From: Murry Taylor [1/27/2024]

As much as I once hoped lawsuits would not be necessary in waking up the Forest Service, I -- a few years ago -- had to change my mind. That damned fire [2020 Beachie Creek Fire, Oregon] could have been jumped [i.e., Smokejumpers] and put out when small. Their [Forest Service] excuses for not doing it were pathetic, saying the duff was four-feet thick, no good jump spots. Tommy and Kathy Albert's home was one of those hundreds lost. Will the Forest Service ever wake up to the fact that **this "back off and slack off"** s--- has got to stop? Hope springs eternal.

From: Guy McMahan [1/27/2024]

SOUND FAMILIAR? STATESMAN JOURNAL (by subscription). I copied the base article below.

An Oregon timber company has sued the U.S. Forest Service for \$33 million for not putting out the 2020 Beachie Creek Fire before it turned into a raging inferno.

Freres Lumber Co., based in the Santiam Canyon, contends the Willamette National Forest's "negligent failure to follow its own mandated fire attack plan" led to one of the largest and deadliest wildfires in state history.

The Beachie Creek Fire originated in the Opal Creek Wilderness in mid-August 2020, most likely ignited by lightning and remained small for weeks. In early September, the fire started to grow and then exploded during historically powerful east winds on Sept. 7 and 8. That fire eventually merged with fires ignited by downed power lines in the Santiam Canyon.

The combination Santiam-Beachie Creek fire burned 193,000 acres, killed five people and destroyed hundreds of homes.

Company President Rob Freres said the fire burned one-third of the company’s private timberland — or about 5,800 acres.

“That fire will affect our business for the next 50 years,” he said.

The thrust of the lawsuit is that the Forest Service decided the Beachie Creek Fire was a “full suppression fire,” but did not commit its resources to putting out the blaze.

“The Forest Service failed to sufficiently utilize the helicopters that were available to suppress and contain the Beachie Creek Fire,” the lawsuit says. “Its initial attack, which the Forest Service recognizes as the best opportunity to control a wildland fire, was entirely unsuccessful at containing the fire, leaving the fire 0% contained. After that failed initial attack, the Forest Service failed to drop any water on the fire for nearly two weeks.”

“As a result of the Forest Service’s negligent failure to follow its own mandated fire attack plan, the Beachie Creek Fire grew from a smoldering 3.5 acres into a firestorm.”

The lawsuit seeks compensation for “lost timber and related damages that are a direct result of the Forest Service’s negligence.”

An investigative story published by the Statesman Journal on Jan. 5, 2021, detailed how the Forest Service managed the Beachie Creek Fire before its blowup. Among other things, it found fire crews dropped 620,000 gallons of water on the Beachie Creek Fire while it was still small and confined it to a remote part of the Opal Creek Wilderness. But they also went nine days without dropping any water, never used fire retardant and didn’t engage the fire on the ground, according to U.S. Forest Service records.

The Forest Service wouldn’t comment on the lawsuit, but in previous stories about how they managed the fire, officials said simply dropping water on the fire would not put it out and they needed ground firefighters to contain it. But two elite hotshot firefighting units turned down the assignment to fight the fire “direct” on the ground, because of the extremely steep, remote and dangerous terrain.

Therefore, the fire crews moved to a “containment” strategy of attempting to keep the fire inside fire lines built around it. They said calls for using fire retardant and additional resources were denied due to other higher priority wildfires.

From: Quentin Rhoades [1/27/2024]

Regarding, another Oregon timber company sues the Forest Service:

“...I wish they’d have asked me first. This is the wrong approach.”

Smokejumper Option and the Tamarack Fire [Text 1]

From: Quentin Rhoades [1/27/2024]

This was the point I was trying to make re the Tamarack Fire. I believe the line officer was not aware of the Smokejumper resource. I know you say, "how could that be?" Well, it is not an anomaly, rest assured. It was not a timber issue or a square or round chute issue. The Redding crew was not called because the line officer was not aware enough to (read, lack of wildland fire experience) make the call. Hey, it happens. So, we have to change and ensure we do not have these knowledge gaps in the future.

The Smokejumper cadre is iconic. Let there be no doubt.

Here is how I see it based on my knowledge of the terrain being discussed. If a Smokejumper crew or even a hotshot crew would have been deployed with an objective of a strong initial suppression tactic, most certainly the number of acres burned would not have burned.

Thinking more broadly, about 27 percent of the 8 million acres burned in 2023 did not have to burn if there would have been a strong initial suppression response overall. The annual Chief's Letter of Intent for Wildfire would have been the perfect instrument to address this goal.

All of this email note is carefully addressed in "A Call to Action."
<https://www.tahoedailytribune.com/news/judge-dismisses-tamarack-fire-case/>

Smokejumper Option and the Tamarack Fire [Text 2]

From: Ted Stubblefield [1/30/2024]

I don't like the way this discussion is headed. SMOKEJUMPERS ARE A KEY RESOURCE in the fight against wildfires!! Make no mistake about this. There may be jumpers who prefer the "lighter duty" of doing other resource work, but that should never be their primary duty.

THE PROBLEM of declining use or requests has to do with key people on the ground, such as DRs [District Rangers] who are clueless about the jumpers as a resource. I even read where one Ranger last summer stated that "*the area of the fire was too remote and unsafe*" for her personnel. That is one of the very reasons the program was formed: early response to remote ignitions.

There are uneducated Line Officers, and perhaps some FMOs [Fire Management Officers] as well, in the field regarding "knowledge" about the key role jumpers play in rapid deployment of resources to fires, while ground forces take more time to hit the line. I make no apology if someone is hurt by my bluntness regarding their "required" knowledge of jumper capability. Without such, they are not who is needed to run a District and care for the resources.

Forest Supervisors have been complaining about this training of Line Officers for over 20 years and it has been falling on deaf ears! We also stated at national meetings that fire experience should be a requirement for DR selections; once again, this has fallen on deaf ears. And now we have the overall problem we are all discussing.

From: Michael T. Rains [1/30/2024].

This was the point I was trying to make regarding the Tamarack Fire. I believe the line officer was not aware of the Smokejumper resource. I know you say, "how could that be?" Well, it is not an anomaly, rest assured. It was not a timber issue or a square or round chute issue. The Redding crew was not called because the line officer was not aware enough to (read, lack of wildland fire experience) make the call. Hey, it happens. So, we have to change and ensure we do not have these knowledge gaps in the future.²⁴⁶

The Smokejumper cadre is iconic. Let there be no doubt.

Here is how I see it based on my knowledge of the terrain being discussed. If a Smokejumper crew or even a hotshot crew would have been deployed with an objective of a strong initial suppression tactic, most certainly the number of acres burned would not have burned.

Thinking more broadly, about 27 percent of the 8 million acres burned in 2023 did not have to burn if there would have been a strong initial suppression response overall. The annual Chief's Letter of Intent for Wildfire would have been the perfect instrument to address this goal.

All of this email note is carefully addressed in "A Call to Action."

Smokejumper Option and the Tamarack Fire [Text 3]

From: Ted Stubblefield [1/29/2024]

I did a pretty extensive feature Oct. 2015 (attached) on the transition from rounds to squares. Framed it with "Is this the best decision----" Wanted to throw out thoughts for consideration. Especially for R5 and R6 where jumping timbered areas was very common.

Got a call from MSO Base Mgr. (at that time) questioning all I said. He did not believe that we steered all the way to the ground in many of our timber jumps. You need to stop steering a square at about 100' up. I asked him how many jumps he had on the Siskiyou or Umpqua--zero. The rounds were very accurate in getting into tight places and spiraling down between trees.

Next got an article from a jumper who said I had it all wrong and that the squares would be something that could be continually improved. History has shown that to be false. Have not heard from him since.

Fire jumps are a fraction of what they used to be. Current jumpers are more interested in getting time on "resource" assignments than jumping a fire. "Quals" [Qualifications] are the key to current success.

I had lunch with Tom Harbor in about 2015 and gave him my thoughts. He said it was the best argument that he had heard against the transition, but it "was a done deal."

I've kept away from the issue since, as it is too divisive and I do not want to break any potential relationship we might have with the current jumpers. The stats and use of current smokejumpers

shows that the USFS is moving away from them and that jumpers are not on the radar of the current fire management.

Burn, burn, burn is the current mantra. At our last NSA board meeting, the current jumper rep. said he would like to see every tree in Idaho burn. We are in a different world.

Downside of the professional smokejumper--when we had other lives, smokejumpers were the first to question the higher ups. No hesitation. Now, drink the Kool-Aid or get another job.

A Rebuttal to the USFS's Justification for Letting the Tamarack Fire Burn

From: Curt Weidmer [1/29/2024]

Tamarack Fire Lawsuits 2024

The USFS Officials justifications for letting the Tamarack Fire burn for 13 days before attacking the fire and a rebuttal to their claims are as follows:

1. On July 4, 2021 the Tamarack Fire started when lightning struck a tree in the U.S. Forest Service's Humboldt-Toiyabe National Forest near Tamarack Lake, southwest of the Alpine County town of Markleeville. The next day, **USFS authorities announced the fire, named Tamarack, was being monitored.**

Reasons why the USFS Officials should have immediately and aggressively attacked the Tamarack Fire and not monitored it:

- The forest was drought-parched, loaded with dry forest fuels, and the weather conditions were very hazardous for fire at the time.
- Other wildfires were burning out of control in Northern California at the time the Tamarack Fire started.

"The Salt Fire in Shasta County in Northern California started on 6/30/2021. The Salt Fire was a wildfire that burned 12,660 acres in the Lakehead area north of Shasta Lake in Shasta County, during the 2021 California wildfire season. The fire was first reported on Wednesday, June 30, 2021, and it was fully contained on July 19, 2021."

These facts give evidence that the USFS Officials should have immediately and aggressively attacked the Tamarack Fire.

2. Five days after the Tamarack Fire started, the Forest Service indicated it made the **"tactical management decision not to insert fire crews to fight the fire due to safety concerns."**

Reasons why this justification by the USFS Officials is not valid:

- A photo taken of the Tamarack Fire 6 days after the fire started showed that there were no significant hazards to firefighters. This photo was reviewed by 3 retired veteran fire captains.

All concluded that there were no significant risks to firefighters. The size of the fire at 6 days was about 100 feet by 200 feet and smoldering.

- Five days after the fire started, Forest Service officials stated the fire was only one-quarter of an acre in size, surrounded by granite rocks, a small lake and sparse vegetation.

These 2 facts give evidence that the Tamarack fire posed no threat to firefighters at the beginning of the fire and still no threat 5 and 6 days later.

3. That same day, five days after the fire started, **Forest Service officials** stated the fire **posed “no threat to the public, infrastructure or resource values.”**

Reasons why this justification turned out to be invalid:

- The Tamarack Fire burned 67,000 acres of prime forest, destroyed over 20 structures, including homes, and nearly killed a team of firefighters entrapped in its flames. Further, the fire endangered the lives of the 1,200 firefighters fighting this fire.

In fact, the Tamarack fire posed a great threat to the public, infrastructure and resource values.

A Timid U.S. Forest Service Response to the Tamarack Fire Put California at Risk²⁴⁷

From: Ken Pimlott [Updated July 25, 2021, San Francisco Chronical]

²⁴⁸On July 4, lightning struck a tree in the U.S. Forest Service’s Humboldt-Toiyabe National Forest near Tamarack Lake, southwest of the Alpine County town of Markleeville. The next day, authorities announced the fire, named Tamarack, was being monitored along with one other fire in the area. Five days later, on July 10, the Forest Service indicated it made the “tactical management decision not to insert fire crews to fight the fire due to safety concerns.”

1. “However,” officials were quick to assure the public, “this is not an unresponsive approach.”
2. That same day, Forest Service officials stated the fire was only one-quarter of an acre in size, surrounded by granite rocks, a small lake and sparse vegetation and posed “no threat to the public, infrastructure or resource values.
3. On July 16, the fire that was deemed not to be a threat began spreading at an explosive speed, producing a smoke column visible for hundreds of miles and putting residents and visitors in the Markleeville area in danger. The Tamarack Fire has now burned over 44,000 acres of public and private lands, forced the evacuation of hundreds of residents, threatened Grover Hot Springs State Park and numerous communities, including Markleeville, and destroyed at least 10 buildings. The fire “too dangerous” to suppress when it was only a quarter-acre, now has over 1,200 firefighters assigned who are placing themselves in harm’s way on the ground

and in the air to protect these communities, the people who live there and numerous natural, cultural and historic resources throughout the area.

4. Why was it too dangerous to fight on July 4 but acceptable only days later to place hundreds of firefighters at risk? The U.S. Forest Service manages approximately 20 million acres of public land in California. In an effort to help thin overcrowded forests and reduce the impact of firefighting activities on the land in designated wilderness areas, the agency may allow naturally started fires (lightning) to burn if they meet pre-established criteria.
5. In addition, the Forest Service will not engage on certain fires that it deems too unsafe for firefighters and not posing a threat to people or infrastructure. The challenge, however, is that much of the land in question is intermixed or adjacent to communities and private forest and range land. Fires do not respect jurisdictional boundaries and the volatile condition of our forests and more extreme weather patterns are driving extreme fire behavior. It is difficult, if not impossible, to truly predict where a fire will burn under these conditions and irresponsible to think it will not impact communities and private lands if left unchecked.
6. Many of the firefighters now conscripted into battling this blaze are from Cal Fire and local fire departments throughout California. They have responded to aid the U.S. Forest Service during this time of need.
7. I am a career firefighter and professional forester. For over three decades, I have experienced firsthand the changing conditions in our forests, oak woodlands and chaparral-covered lands. I am the first to say we should be using every tool in our toolbox to manage these landscapes to reduce the risk of fire and protect our communities and valuable natural resources. This includes harvesting trees to thin the forest, constructing fuel breaks in strategic locations, implementing fire prevention programs, and using prescribed and natural fire where possible.
8. However, now is not the time to consider any strategy other than aggressively suppressing fires.
9. It is no secret that California has experienced increasingly destructive and deadly wildfires over the last two decades. This year is no different. More acres have already burned in 2021 compared with this time last year, and the state is in the throes of yet another catastrophic drought. Measurements of the condition of wildland vegetation taken by firefighters and forest managers indicate it is critically dry and setting records for its flammability — conditions more akin to October or November than July. Our forests are gasoline waiting for a spark, and they are only going to get worse. And if the upcoming rain season is yet again insufficient, we will be right back in the thick of these volatile burning conditions next year.
10. A change in the way fires are dealt with on federal lands in California is beyond overdue.
11. The U.S. Forest Service needs to recognize that its timid response to the Tamarack Fire, and other fires like it, creates greater risk for our firefighters and the public. A fire that should have been out in matter of days with only a few firefighters will now tie up critical firefighting resources for weeks, if not longer — making them unavailable to respond to new

fires and increasing the physical and mental impacts firefighters must endure, not to mention the risk for injury as they make heroic efforts to save lives and property.

12. These hard-working men and women will clearly not get a break again this year. We can't afford to make the arduous job of firefighting any harder than it already is.

National Forest Plan Amendment to Conserve and Steward Old Growth Forests.

From: Frank Carroll [Data Submitted (UTC 11): 2/3/2024 3:45:00 AM]

Comments: The greatest single threat and the single most important independent factor in declining MOG [Mature Old Growth] are current Forest Service and Park Service fire policies that posit, without evidence and without disclosing environmental impacts, that widespread firing operations and wildfire use are the best way to manage our public resources.

Under the thin guise of alternative arrangements granted to wildfire suppression agencies, the Forest Service has embarked on a terrorist campaign of officially sanctioned arson. There is no accountability, no opportunity for the public or shareholders to comment or object, and no compensation for public or private property owners. The Forest Service is burning with impunity and without regard for the massive destruction caused by this failed and potentially criminal activity.

During the North Complex fire in 2020, fire officials and agency administrators decided to light firing operations at midday at the height of fire season to burn together two fires on the north rim of the Middle Fork of the Feather River Canyon south of Quincy, CA. They began "widespread firing operations" on September 3 and stopped lighting during the night of September 7-8, 2020. On September 8, firing operations lit from dozer lines south of the canyon burned across the Canyon and into the Bear Fire footprint. On September 9, that fire roared to life, burning 180,000 acres of old growth in one burning period, killing 16 civilians, burning two communities, including Berry Creek, wiping out the kids' cancer camp at Camp Okizu, and burning into Oroville, CA.

As is typical of current wildfire suppression policy, firefighters lit the North Complex disaster without regard to consequences in the teeth of predicted red flag conditions and with insufficient resources to contain the resulting firestorm. Over 60 percent of the Dixie Fire was lit to expand the fire into a million-acre nuclear zone for mature old growth. Six hundred thousand acres were lit without a single coherent decision document other than a woefully inadequate WFDSS and no thought at all for NEPA, NFMA, APA, or any of the substantive laws like clean air, clean water, T&E Species, and many others.

The August Complex, River Complex, and so many others, principally across the 11 Western States but in Gatlinburg, TN, and other states, have been accomplished since at least 2000 without a single nod of any kind to public process. No accountability. There is no power to compensate victims of the Forest Service's fatal decisions and hubris.

The assault on MOG and every other forest resource has made forest plans irrelevant. This potentially criminal activity was accomplished under the shield of the Chevron Deference, which required courts to defer to Forest Service line officers since 1984. The Chevron Deference will now be overturned by the SCOTUS this coming summer and the entire basis for the Wildfire Use fiction will be subject to the most rigorous NEPA/NFMA/FLPMA/APA, as will your Record of Decision on this planning effort.

You had best prepare for objections absent the Chevron Deference and lawsuits resulting from the cavalier and politically motivated way you address MOG and Wildfire Use. It's time to hire NEPA experts if you can find any.

In the public interest, I demand you disclose the full environmental effects and impacts of your proposed action and robust alternatives. The consequence of not doing so would be for you to have to start from the beginning following the loss of your bureaucratic power to unilaterally decide the fate of our public and private lands, properties, and resources, including MOG.

You must provide a thorough and authentic public process to include interested and affected parties. Your wildfire committee of group thinkers does not constitute cooperation and coordination and is not public input. I believe your weak attempt to separate and manage MOG as a single resource will be disastrous, and there is no way to shield the implementation of your proposal from your fire organization and fire policies. You are a giant fire department uninterested in planning and disclosure and ruled by pseudo-scientists claiming wildfire is the best way to #BurnBackBetter for the entire ecosystem services, including MOG.

You must include management alternatives that do not include wildfire use. The 1910 fires were disastrous to our old-growth timber and other resources. The current policies are more disastrous still. Your agency is ruled by a generation who has no idea what implementing the administrative and substantive laws looks like or how to do it. You may have to call on the Old Guard for counsel. It is better to ask for advice than to fall before the experience of people with a much broader perspective than your own increasingly limited tunnel vision about the powers and prerogatives of the Administrative State.

Your current approach to the Northwest Forest Plan update and the MOG national program EIS are cynical and poorly considered. You must gather your OGC and plan for the end of the Chevron Deference

Please plan, prepare, and execute a comprehensive process that will genuinely involve the public, not the 10month timeframe you plan to have a political decision before the election. Such an approach would set you back years.

You must address the impacts of smoke and wildfire use residence times on the health of the Nation and various regions and neighboring countries. You must calculate and disclose the loss of MOG to wildfire use since 2000 and then predict the losses over the next decade.

You must address the NWFP impacts on spotted owl habitat over the past 30 years. You hoped to preserve spotted owl habitat by singling out buffer zones and no-management areas to preserve old growth and MOG. Instead, you set the stage for the disastrous loss of the habitats you tried to save. How will you not make the same mistake this time? We called it the Disneyland approach then, and nothing has changed. Explain how you will avoid another 30 years of disasters for MOG and owls without appropriate physical management of the vegetation that builds under the canopy and then serves as fuel to burn entire ecosystems and ecosystem services.

Please disclose your activities' environmental impacts and effects since 2000 and your predicted impacts through 2050. Your alternative arrangements from CEQ will disappear with the Chevron Deference. What will you do? What is your desired future outcome, not based on your ridiculous assertions that burning hot head fires through hundreds of thousands and millions of acres of MOG and owls is good because you say so, but based on the cumulative effects analysis you have avoided for 30 years and intend to avoid now.

I think these comments are sufficient for the moment and to achieve standing for the objections and lawsuits to come.

Forest Service wildfire management policy run amok: from suppressing fires, to confining fires, to expanding fires, to igniting fires.

From: Sarah Hyden [in the Smokey Wire: National Forest News and Views, July 15, 2023]

“...Managed wildfire for resource benefit,” Now? Are forests currently receptive enough? No, NOT NOW. The Forest Service has given themselves virtually a carte blanche to conduct intentional burns over a wide area nearby wildfire — all without NEPA analysis or any public involvement in the planning process.

END [OF A.47 AS OF 2/12/2024] 

Appendix A.48. Proposed Input into the 2024 Annual Chief’s Letter of Intent for Wildfire [also, see Appendices A.48.1 thru A48.4 that follow]



NATIONAL WILDFIRE INSTITUTE

Supporting Healthy Forests That Resist Catastrophic Fire

To: Randy Moore, Chief, USDA Forest Service, randy.moore@usda.gov

From: Michael T. Rains, mtrains7@verizon.net on behalf of the National Wildfire Institute and seventy-six supporters.

Date: February 7, 2024

Re: The 2024 Chief’s Letter of Intent for Wildfire, Suggested Inclusions

CC: Roseanna Wary, roseanna.wary@usda.gov

Chief Moore:

On behalf of the National Wildfire Institute [NWI] and a wide-range of conservation leaders, we seek your consideration as you craft the annual Chief’s Letter of Intent [LOI] for Wildfire, 2024.

As you know, the NWI has written extensively about the need for an aggressive Initial Attack on all unplanned wildfires. We are extremely concerned by terms or phrases like “managed fire”; “beneficial fire”; “backing off”; “backing off to the next best ridge” or anything else that suggests less than putting the unplanned wildfire out immediately.

USDA Forest Service surveys show that approximately 90 to 110 million acres of National Forest are in Condition Class 3 [ready to burn] and Condition Class 2 [soon ready to burn]. About twenty-four years ago when the *National Fire Plan* was developed, the figure was about 38 million acres. The massive increase is primarily due to lack of maintenance on forested landscapes that have been burned and not rehabilitated; insect and disease infestations; and, lack of preventive silvicultural treatments. This includes a large percentage of the forest plantations that have been neglected for decades.

The lack of salvage and other rehabilitation efforts have left forested landscapes with millions of dead trees that in less than a decade after the initial burn will be the kindling for the next destructive unplanned wildfire. Annual costs of destruction from unplanned wildfires are approaching a trillion dollars. Accordingly, expanded program direction for timber harvesting and pre-wildfire hazardous fuel removal – including post wildfire rehabilitation activities – must be of the highest priority.

Hundreds of thousands of acres of critical wildlife and fisheries habitat have been lost including thousands of acres of critical watersheds. “Managed” wildfire policies have caused weeks and months of air pollution that has adversely affected the health of our citizens across the rural to urban land gradient. Levels of PM [Particulate Matter] 2.5 and PM 10 have exceeded national and state air quality standards for weeks and months in areas affected by the huge long-term unplanned wildfires. The adverse impacts to the American people, especially the very young and very old are well documented, including page 16 of *A Call to Action* [Rev. 17.5] [Full Document].

As you finalize the critically important 2024 LOI, we strongly recommend you include the following components:

- Stop all so called "managed" wildfire. This will mean eliminating the use of terms that suggest a suppression tactic that is less than "first put out the fire." For example, in addition to "managed fire," do not use "beneficial fire"; "backing off"; or, "backing off to the next best ridge" tactics until forested landscapes are more resilient to unplanned wildfires and other disturbances. We can only imagine what a powerful message that would be to the American people and clearly, a heightened credibility for the Forest Service. We urge you to more fully examine [The Concept of "Managed Fire."](#)
- Maximize resource applications with every initial attack, whether it be roadside, in the brush or timber, or remotely in Wilderness Areas. Enable your iconic Smokejumper cadre to be much more effectively utilized to help keep fires small.
- We think it is time for a more contemporary "10 AM" policy whereby the Forest Service strives to put out all unplanned wildfires within one-day following the initial detection of an unplanned wildfire. Everyone in the agency shall know this is your goal.
- Any extended attack shall be direct wherein burnouts and backfires will only be used when required for firefighter safety. The "big box" strategy and tactics will not be used.
- Wildfire early detection systems and programs will be aggressively activated.
- All use of prescribed fire will require advanced approval from Regional Foresters and local county officials. And, you must emphasize the need for mechanical treatments.

Allow us to continue to emphasize that SMOKE kills people. Those who have fought fires for many decades and lived with smoke must come to grips *"with the killing nature of smoke upon America's citizenry."* Creating smoke through any endeavor is less and less a viable option. Please have your LOI call this out and implore your Incident Commanders to put out all unplanned wildfires immediately, no exceptions.

The following hyperlink will also be helpful as the LOI is finalized: [1-Page Summary \[rev. 17.5\]](#). We stand ready to assist you and the agency to better care for America's landscapes and to be much more effective in addressing this national emergency of unplanned wildfire destruction due to the lack of forest care. Thank you for your leadership.

Very respectfully,



Michael T. Rains
National Wildfire Institute

Note: Attached to this letter, the names of 76 supporters.

Appendix A.48.1 Input into the 2024 Annual Chief’s Letter of Intent for Wildfire [Proposal; Reply; Response]: “Please, Go Away”



NATIONAL WILDFIRE INSTITUTE

Supporting Healthy Forests That Resist Catastrophic Fire

To: Randy Moore, Chief, USDA Forest Service, randy.moore@usda.gov

From: Michael T. Rains, mtrains7@verizon.net on behalf of the National Wildfire Institute and other supporters.

Date: April 2, 2024

Re: The 2024 Chief’s Letter of Intent for Wildfire, Reply to Agency Response, March 27, 2024

CC: Roseanna Wary, roseanna.wary@usda.gov

Chief Moore:

We received your response to our letter asking that so called “managed” wildfire be stopped in your annual Chief’s Letter of Intent for Wildfire for the 2024 wildfire season. That reply is included as Appendix A.2 of this correspondence. Allow me the courtesy to be helpfully honest. The response delegated down to your Acting Director of Fire and Aviation Management was extremely disappointing; he said he was speaking for you.

Our request was designed to help address a National Emergency. That is, the horrific destruction of property and lives lost from unplanned wildfires due to the lack of forest management over the last three decades. We did not need an introductory lesson on fire suppression policy. As you know, the initial letter to you was from the National Wildfire Institute and others, many of which are well-respected landscape scale conservationists with legendary experiences in fire suppression tactics. As one individual put it, “...that response came from shelf five.” Another put it a bit more direct when he stated: the answer from the Chief’s Office was “don’t bother me”.

Again, we are trying to influence the ability of the Forest Service to effectively address a National Emergency. Respectfully, we ask that our request not be trivialized. Our concerns have been extensively outlined in *America’s Forests in the Balance: A National Emergency* [aka, [A Call to Action](#)] and bolstered by the latest [NACO Policy Resolution](#). Accordingly, anticipating that it is not too late, we shall try once more.

In the agency’s response, your Acting Director states: “...These fires [“managed” fires] can prevent larger, more destructive fires in the future, especially in *fire-prone and fire-adapted ecosystems*...” This may be true in concept. But these “managed” fires can also do other things. They can become large destructive fires, *especially* in fire-prone and fire-adapted ecosystems. In fact, many of the largest and most destructive wildfires of this century originated as unplanned wildfire fires used as tools to achieve so called resource benefits.

For example, Wyoming’s Roosevelt Fire in 2018 comes immediately to mind. After the Forest Service decided to use the incident to restore fire to its natural role in the ecosystem, it became a conflagration that destroyed over 50 of your neighbors’ homes. Two people suffered horrible burns and were nearly killed.

The Tamarack Fire in California in 2021 is a classic example of not using a strong Initial Attack to suppress. It has been suggested many times that a Hotshot or Smokejumper crew could have probably put that fire out in under ten acres. However, after thirteen days of “monitoring”, the Tamarack Fire scorched almost 70,000 acres [about the area of Athens, Georgia] and took about 1,200 firefighters to finally contain. What a colossal destruction of land and waste of resources.

The same may be said for the Pole Creek Fire [Utah, 2018]; the August Complex Fire [California, 2020 -- it destroyed the town of Ruth, California]; the Dixie and Caldor Fires [California, 2021]; and, last year’s Smith River Complex [California] where firefighters lit a 40-mile firing operation. Many have concluded that these fires could have been extinguished with far less acres burned and the associated destruction if the concept of “managed” or beneficial” fire had not been deployed. Estimates conclude that about 27 percent³ of the acres burned from unplanned wildfires in 2020 probably did not have to burn if the notion of “managed” fire were not deployed. That’s about 2.7 million acres [about the area of Connecticut] needlessly destroyed; last year, about 730,000 acres [about one-half the area of Delaware].

I am reminded every day that the National Forests are public lands, and the Forest Service must emphasize the care of these lands and the constant service to its owners – the American people. Thus, I was indeed taken back by the logic that “managed” fire somehow helps reduce smoke. As one conservation leader said after reading your Acting’s response, “all fires produce smoke which humans inhale. Smoke is smoke, no matter what the intention of the fire...” I doubt those affected by respiratory illnesses would be calmed by the agency’s view. Thousands of people die each year due to smoke-complicated medical conditions. Clearly, as we have often stated, “smoke is also a killer.” Any tactic that prolongs a fire simply makes things worse – at least for the foreseeable future.

I fully understand that there is tremendous pressure from within the agency to continue using “managed” fire, especially from the Research and Development mission area. And, with some outside the Forest Service. Destruction costs from unplanned wildfires is approaching **\$1 trillion** [about \$3,100 per person in the US] annually⁴. We must find a common ground. Personally, I believe in fire as a forest management tool, when it is “...at the right time, at the right place and the fire is right.” However, since I wrote the *National Fire Plan* for the US Department of Agriculture over twenty years ago, I have not seen many of these situations [i.e., the three “rights”]. Thus, let’s conclude for NOW, that to “back off to the next major highway or lakeshore” is an unacceptable fire suppression tactic. The forest conditions are clogged up and simply not receptive enough to using unplanned wildfires as a forest management and a restoration target attainment tool. You are killing the public commons.

³ See Appendix A.5, page 41, *A Call to Action* [rev. 17.5].

⁴ Annual wildfire costs. [JEC Report](#), October 2023.

Concluding, in our initial letter to you – shown in Appendix A.1, we listed six items that we recommend be included in your final 2024 Chief's Letter of Intent for Wildfire; we urge you to include them all. And, of course, please ensure your Incident Commanders are directed to adhere to a strict "put out the fire immediately, using all available resources." Again, we are facing a National Emergency. We know what to do. Your firm leadership on this National Emergency is fundamental. Ask the towns of Barry Creek, Weed and Greenville, California what they think. Enough is enough!

Finally, please do not waste the valuable time of the United States Forest Service in writing a similar reply from an Acting. However, we do ask that you send us a copy of your final 2024 Chief's Letter of Intent for Wildfire as a professional courtesy.

Very respectfully,



Michael T. Rains
National Wildfire Institute

Appendix A.48.2. Initial Letter to America’s Chief Forester Regarding Suggestions from the National Wildfire Institute to Strengthen the Chief’s Annual Letter of Intent for Wildfire for 2024

To: Randy Moore, Chief, USDA Forest Service, randy.moore@usda.gov
From: Michael T. Rains, mtrains7@verizon.net on behalf of the National Wildfire Institute and seventy-six supporters.
Date: February 7, 2024
Re: The 2024 Chief’s Letter of Intent for Wildfire, Suggested Inclusions
CC: Roseanna Wary, roseanna.wary@usda.gov

Chief Moore:

On behalf of the National Wildfire Institute [NWI] and a wide-range of conservation leaders, seek your consideration as you craft the annual Chief’s Letter of Intent [LOI] for Wildfire, 2024.

As you know, the NWI has written extensively about the need for an aggressive Initial Attack on all unplanned wildfires. We are extremely concerned by terms or phrases like “managed fire”; “beneficial fire”; “backing off”; “backing off to the next best ridge” or anything else that suggests less than putting the unplanned wildfire out immediately.

USDA Forest Service surveys show that approximately 90 to 110 million acres of National Forest are in Condition Class 3 [ready to burn] and Condition Class 2 [soon ready to burn]. About twenty-four years ago when the *National Fire Plan* was developed, the figure was about 38 million acres. The massive increase is primarily due to lack of management on forested landscapes that have been burned and not rehabilitated; insect and disease infestations; and, lack of preventive silvicultural treatments. This includes a large percentage of the forest plantations that have been neglected for decades.

The lack of salvage and other rehabilitation efforts have left forested landscapes with millions of dead trees that in less than a decade after the initial burn will be the kindling for the next destructive unplanned wildfire. Annual costs of destruction from unplanned wildfires are approaching a trillion dollars. Accordingly, expanded program direction for timber harvesting and pre-wildfire hazardous fuel removal – including post wildfire rehabilitation activities – must be of the highest priority.

Hundreds of thousands of acres of critical wildlife and fisheries habitat have been lost including thousands of acres of critical watersheds. “Managed” wildfire policies have caused weeks and months of air pollution that has adversely affected the health of our citizens across the rural to urban land gradient. Levels of PM [Particulate Matter] 2.5 and PM 10 have exceeded national and state air quality standards for weeks and months in areas affected by the huge long-term unplanned wildfires. The adverse impacts to the American people, especially the very young and very old are well documented, including page 16 of *A Call to Action [Rev. 17.5]* [Full Document].

As you finalize the critically important 2024 LOI, we strongly recommend you include the following components:

- Stop all so called "managed" wildfire. This will mean eliminating the use of terms that suggest a suppression tactic that is less than "first put out the fire." For example, in addition to "managed fire," do not use "beneficial fire"; "backing off"; or, "backing off to the next best ridge" tactics until forested landscapes are more resilient to unplanned wildfires and other disturbances. We can only imagine what a powerful message that would be to the American people and clearly, a heightened credibility for the Forest Service. We urge you to more fully examine [The Concept of "Managed Fire."](#)
- Maximize resource applications with every initial attack, whether it be roadside, in the brush or timber, or remotely in Wilderness Areas. Enable your iconic Smokejumper cadre to be much more effectively utilized to help keep fires small.
- We think it is time for a more contemporary "10 AM" policy whereby the Forest Service strives to put out all unplanned wildfires within one-day following the initial detection of an unplanned wildfire. Everyone in the agency shall know this is your goal.
- Any extended attack shall be direct wherein burnouts and backfires will only be used when required for firefighter safety. The "big box" strategy and tactics will not be used.
- Wildfire early detection systems and programs will be aggressively activated.
- All use of prescribed fire will require advanced approval from Regional Foresters and local county officials. And, you must emphasize the need for mechanical treatments.

Allow us to continue to emphasize that SMOKE kills people. Those who have fought fires for many decades and lived with smoke must come to grips "*with the killing nature of smoke upon America's citizenry.*" Creating smoke through any endeavor is less and less a viable option. Please have your LOI call this out and implore your Incident Commanders to put out all unplanned wildfires immediately, no exceptions.

The following hyperlink will also be helpful as the LOI is finalized: [1-Page Summary \[rev. 17.5\]](#). We stand ready to assist you and the agency to better care for America's landscapes and to be much more effective in addressing this national emergency of unplanned wildfire destruction due to the lack of forest care. Thank you for your leadership.

Very respectfully,



Michael T. Rains
National Wildfire Institute

Appendix A.48.3. Response From the USDA Forest Service Chief’s Office Regarding Suggestions from the National Wildfire Institute to Strengthen the Chief’s Annual Letter of Intent for Wildfire for 2024

File Code: 5100 (8949380)

Date: March 27, 2024

Mr. Michael T. Rains
National Wildfire Institute
45 Lindbergh Avenue
Broomall, Pennsylvania 19008

Dear Mr. Rains:

Thank you for your letter of February 7, 2024, to the U. S. Department of Agriculture’s Forest Service Chief Randy Moore, regarding inclusion of certain topics, including unplanned wildfires, in the 2024 Chief’s Letter of Intent for Wildfire. Chief Moore has asked me to respond.

When wildfires threaten lives, communities, or homes, the Forest Service will use all available strategies and tools to suppress them. Our suppression strategy balances firefighter safety with public safety and efforts to protect property and infrastructure. Federal, non-Federal, and local resources work together whenever possible to contain these fires safely and effectively. Through our efforts, 98 percent of wildland fires on National Forest System lands are contained within 24 hours of initial response.

We continue to use all available tools and techniques to reduce negative impacts from wildfires. As we expand use of prescribed fire to reduce wildfire risk, we also need to manage natural ignitions when necessary. The Forest Service manages each wildfire with a strategic, risk-based response, appropriate to the threats and opportunities, and uses the full spectrum of management actions.

In some cases, lightning fires are closely managed for fuel reduction, to support wildlife habitat, or for ecosystem and forest health, consistent with interagency policy and Land and Resource Management Plans. These fires can prevent larger, more destructive fires in the future, especially in fire-prone and fire-adapted ecosystems. These fires can prevent the smoke events that come with large, destructive fires that cannot be suppressed on initial attack.

The Forest Service is committed to our partnerships with Federal and state agencies, Tribal governments, communities, and landowners to accomplish our common goals of forest health and reducing wildfire risk to communities.

Again, thank you for writing and for sharing your recommendations.

Sincerely,
ALEX ROBERTSON, Acting Director, Fire and Aviation Management

Appendix A.48.4. USDA Forest Service, Chief’s Annual Letter of Intent for Wildfire [LOI] – April 24, 2024 [Final, With Some Additional Thoughts]

[See the signed letter here](#)



The 2024 LOI is Out!

Some Additional Thoughts by the National Wildfire Institute and Others. The 2024 Chief’s Annual Letter of Intent [LOI] is out. Starting on page 212 and going through page 219 [Appendices A.48 – A.48.3], of *A Call to Action*, the reader will see the attempts by the *National Wildfire Institute and Others* to influence the 2024 LOI.

A dominant recommendation included a plea to strive to put out all unplanned wildfires out immediately with a strong Initial Attack. Essentially, we wanted to halt using the “managed” wildfire suppression tactic until forested landscapes are more resilient – indeed, more accepting - of the intensity of unplanned wildfires and other disturbances. We strongly believe this would be a powerful message, resonating with the owners of the National Forests, the American people. And, clearly help heighten the credibility of the USDA Forest Service. The *A Call to Action* has written extensively about “*Managed Fire*.”

The final version of the 2024 LOI was signed and sent on April 24, 2024. As far as most of our cadre²⁴⁹ are concerned, the 2024 LOI basically ignored all of our recommendations. As one colleague stated, “...our advice was rejected and/or ignored.” Recall that we sent two letters emphasizing our concerns.

The final 2024 LOI seems far too inwardly directed. Yes, we know it is agency direction and of course, everyone has different writing styles. But, the LOI reaches so many outside of the Forest Service, it must be clear and easy to read. But the prose of the text in this 2024 LOI is hard to follow. For example, as one reader concluded, “...I might need some help “deciphering” the code here...just the first graph is an eye-opener!” It [the 1st paragraph] states, with highlighting added for emphasis:

“..Last year we significantly progressed toward achieving many of our top agency priorities; I’m proud of the efforts of each and every employee. The tremendous achievements of 2023 set the stage for a promising 2024. Our collective commitment and resilience turned vision into action. We faced challenges head on with significant contributions from employees at all levels, at home and abroad. Our historic achievement to treat over 4.3 million acres of hazardous fuels underscores our dedication to accelerate strategic investments and intentionally allocate expertise.”

Except for the acknowledgement of the fine Forest Service employees, which is quite true, and the number 4.3 million areas, I am not at all sure what the first paragraph says. Clearly, I give way to superior expertise, but specifically what does, “...accelerate strategic investments and intentionally allocate expertise” mean?

A key culprit of these intense unplanned wildfires we are encountering is the lack of forest maintenance on federal forests over the past 30 years. Estimated minimal needs for just the Forest Service are about +\$2.2 billion annually for at least the next 5-7 years. The current budget for expanded forest maintenance clearly does not allow for “acceleration” to be meaningful [read, make a real difference]. And, emphasized “biomass uses” [see page 21 of *A Call to Action*], a possible “game changer” for cost-effective forest maintenance, has been so eroded over the last five years. A minimum +\$33 million annually is required here. Thus, the language is confusing. And, how many of the 4.3 million acres of fuels management is the result of direct action or the consequence of unplanned wildfire whereby site productivity is forever changed and forests are becoming brushfields.

How many, even within the Forest Service, know what are the “...[Wildfire Crisis Strategy](#) landscape restoration goals” [see paragraph 5 of the 2024 LOI]? See also Appendix 6, page 42 of the *A Call to Action*.

I understand, as a former Forest Service Chief just recently stated regarding these very same issues, “...I’m out of practice.” However, the staccato of the text is hard – at least for me – to fully understand. Maybe next year’s LOI [2025] can be more *humane* so that a wider range of citizenry in our country can better understand how their lives and lands are going to be protected from the destruction of unplanned wildfires. Maybe one action – right at the beginning of the LOI direction could be, “...we shall strive to put out all unplanned wildfires immediately.” How difficult a statement can that be? It’s not rhetorical. Please ask your contacts and Members of Congress what they think. Perhaps they can help better interpret the 2024 LOI and assist with the 2025 LOI to be clearer.²⁵⁰

Appendix A.49. A Critical “Thinkpiece” By Bruce Courtright²⁵¹

Bruce Courtright:

The U.S. Forest Service...Headed For Extinction Or Revitalization?

October 17, 2016

Appendix A.50. Another Critical “Thinkpiece” By William A Derr²⁵²

From: William A. Derr, Special Agent in Charge, U. S. Forest Service, California Region [ret.]

Subject: The Use of Fire as a Resource Management Tool

Date: September 30, 2023 at 10:34:21 AM PDT

The use of fire as a resource management tool to remove unwanted hazardous fuel buildups from forested areas is an on-going need. Hazardous fuel buildups have increased dramatically in recent years due to the lack of forest maintenance and significant curtailment of timber harvesting. The lack of extensive salvage logging and removal of hazardous fuels after a wildfire has also left these areas in a tinderbox state subject to burn again.

Prescribed fire, wherein it is pre-planned and approved with pre-placement of control forces and lines and done by well qualified personnel at the right time, place, and conditions is the soundest method of using fire to remove hazardous fuel buildups. Sadly, some of these prescribed fires have escaped and caused unacceptable damage to natural resources and private property, including unnecessary risks to firefighters and the public because the criteria of right time, place, and conditions was not met nor were those conducting the prescribed fire sufficiently qualified to do so. Prescribed fires are designed to be low intensity ground fires.

Inadequate funding and expertise, coupled with restrictive regulations and liability concerns, have inhibited full use of prescribed fire. Hence, the move to allowing unplanned wildfires to burn as a workaround to the limitations on prescribed fire, wherein said limitations are reduced.

In recent years some unplanned wildfires have been allowed to burn as a “Managed Fire”, currently referred to as “Beneficial Fire”. Unfortunately, many of these “Beneficial Fires” have escaped and have far exceeded outcomes to those of escaped prescribed fires. Adhering to the strict “criteria” for a prescribed fire is virtually impossible when allowing an unplanned wildfire to burn. Hence, the high rate of escapes. Millions of acres of valuable National Forest lands have been burned in the West due to the escape of “Managed Fires”. Managed fires generally burn as high intensity fires and are not limited to ground fuels. These landscapes are not likely to return to their original state, but, rather brush and grass fields ready to burn again. “Beneficial Fire”, they are not.

When unplanned wildfires are allowed to burn, firefighting forces needed to manage them become unavailable to respond to new starts, thereby inhibiting containment and control resulting in escapes. Further, allowing an unplanned wildfire to burn during fire season, when resistance to control factors are high, increases the probability of escapes.

Local communities have been adversely impacted by escaped prescribed and managed fires. Also, put at additional risk by the lack of forest maintenance pre and post wildfires.

Of course, firefighter and public safety must always be first priority when engaged in wildfire tactics & actions.

A policy of aggressively suppressing all wildfires during fire season and not allowing unplanned

wildfires to burn is a sure prescription to ensure the protection and management of our Nation’s National Forests for the delivery of valuable goods and services to the American people in perpetuity, consistent with the direction in the Organic Act.

The contention that a century of aggressive suppression of wildfires is responsible for today’s buildup of hazardous fuels is not factually supportable.

Congressional legislation that directs the agencies responsible for the protection and management of Federal forested lands that implements the principles outlined above and the funds to do so will preserve these National treasures for future generations.

Appendix A.51. IAFC Policy Response and Recommendations²⁵³



IAFC

International Association of Fire Chiefs

Chief John S. Butler
President and Chair
Board of Directors

Policy Response and Recommendations

Federal Wildland Fire Mitigation and Management Commission Final Report

In response to the Wildland Fire Mitigation and Management Commission final report to Congress, the International Association of Fire Chiefs (IAFC) supports findings and federal policy recommendations in the report that align with the IAFC's ongoing efforts to reduce the risk of wildfire in our communities and to better address our nation's growing wildfire crisis.

The final report, released on September 27, 2023, outlines a comprehensive, consensus-based, set of recommendations to Congress to change the nation's relationship with wildfire. While the focus in this report is on federal legislative action, the solutions proposed are also relevant to state, local, Tribal and territorial governments, the nonprofit, private and academic sectors, and the public at large.

Background

The risk of wildland and wildland-urban interface fires is increasing in both significance and prevalence in the United States. Reasons for this trend include the growing density and decreasing health of our forests; a hotter and dryer climate trend; and the increase in the number and density of homes built in the wildland-urban interface. The statistics show a general trend of an increasing size of wildland fires, an increase in number of homes destroyed, and an increase in both suppression costs and of financial losses due to wildland-urban interface fires.

The Wildland Fire Mitigation and Management Commission (the Commission), created by President Biden's Bipartisan Infrastructure Law (BIL) and announced in December 2021, was charged with making recommendations to improve federal policies related to the mitigation, suppression, and management of wildland fires in the United States, and the rehabilitation of land in the United States devastated by wildland fires. The Commission was tasked with developing two reports to Congress: a report on aerial firefighting, and another report to deliver a comprehensive set of recommendations to address the nation's wildfire crisis. The second report was released on September 27th, 2023.

In addition to establishing the Commission, the BIL provides historic funding for a suite of programs aimed at reducing wildfire risks, detecting wildfires, instituting firefighter workforce reforms, and building more resilient infrastructure. The Commission's work builds on existing interagency federal efforts, such as the Wildland Fire Leadership Council and the White House Wildfire Resilience Interagency Working Group and will continue to pursue an all-of-government approach to wildfire risk reduction and resilience.

The Commission is composed of representatives from federal agencies, state, local and Tribal governments, and representatives from the private sector and has been meeting regularly over the past year to craft these reports. While the International Association of Fire Chiefs did not have a specific representative on the Commission assigned to the organization, the IAFC Wildland Fire Policy Committee (WFPC) has maintained regular interactions with members of the Commission throughout the process and submitted recommendations through the established portal for consideration by the Commission work teams.

Position

The IAFC supports collaborative efforts to reduce wildfire risk in communities and to better adapt to wildland and wildland-urban interface fires. The themes of the Commission report align well with IAFC positions on wildfire risk, preparedness and response.

Past IAFC positions which remain relevant within the report include the following:

- Support for the National Wildland Fire Cohesive Strategy
 - Restoring and maintaining resilient landscapes
 - Promote fire-adapted communities
 - Safe and effective wildland response
- Utilization of Local Government Resources for Wildland and WUI Fires
 - Solutions must be collaborative
 - Resources are frequently not being effectively utilized
 - All levels of government should have appropriate representation in collaborative organizations such as the National Wildfire Coordinating Group (NWCG), National Multi-Agency Coordination Group (NMAC), Geographic Area Coordination Centers (GACCs), and qualification committees.
 - Qualification management in wildland should use NWCG 310-1 as the common framework but promote tools such as Recognition of Prior Learning and the Skills Crosswalk.
 - Resource ordering should be accomplished using a single platform that tracks resources through all stages of response and integrates all existing tools.
 - Reimbursement management must be effective, ensure timely recovery, and be based upon improved and perhaps standardized agreements.
- Collaborative Efforts for Reducing Community Risk in the Wildland Urban Interface
 - Cooperation and coordination are essential
 - Support from federal agencies for existing and expanded programs is key to ensure local partnership and capability
 - Risk assessment, education of the public in general and elected and appointed leaders, community planning, and mitigation practices are all effective and recommended.

The following are specific priorities of IAFC that align with recommendations within the Commission report. Specific report recommendations follow each priority statement.

- Create a national inventory of all hazard resources and a shared real-time system for deployment of all resources, and to the extent possible, promote closest appropriate unit response. (47, 52, 53)
- Ensure effective integration of certifications and qualifications for the all-hazard workforce. (54, 55, 56)

- Create a simplified and standardized national agreement to be used by all states to capture and engage resources at all levels which will help to ensure timely reimbursements for actual costs. (47, 50, 51, 52, 53)
- Allow resource ordering and reimbursement processes to be used for prescribed burns. (14)
- Improve funding and budgeting processes to ensure a consistent and year-round workforce. (119, 120, 121, 122, 123, 125)
- Create a shared all-hazard incident decision making process using comprehensive data and modern technology, including integrated remote sensing. (33, 45, 83, 104, 105, 106, 107, 108, 109, 118)
- Provide true nation-wide broadband capability for communications and data sharing. (118)
- Create a single consolidated data collection and reporting platform and ensure that data is accessible for all users. (1, 4, 33, 44, 83, 104, 105, 106, 107, 139)
- Promote dedicated local representatives on the National Multi-Agency Coordinating Group and Geographic Area Coordination Centers. (60, 139)
- Support adoption of enhanced building/wildfire planning and codes that recognize structure hardening and best fire-resistant practices at the local and state levels. (1, 2, 3, 6, 129, 134)
- Include local governmental, non-governmental, and private participation in the planning, communication, and execution of wildland fire mitigation and landscape efforts, prescribed fires, and post-burn assessment. (12, 13, 17, 18, 23, 25, 33, 40, 41, 43, 57, 58, 60, 66, 67, 71, 72, 134)
- Create post-fire recovery Incident Management Teams so communities are not left with the issues after a response oriented IMT leaves. (60, 66, 67, 68, 75, 83)
- Ensure funding and create navigator positions to help communities access needed preparation and recovery funds. (36, 61, 62, 63, 64, 65, 68, 124, 126, 129, 134, 142, 143, 144)
- Facilitate changes to environmental clearances to expedite prescribed burns. (12, 108, 109)
- Invest in physical and mental health programs that are targeted across all response levels. (94, 97, 98, 100)

The IAFC is supportive of the shared framework that has been established during the Commission process, and eager to implement those specific recommendations that are within the IAFC scope of interest. The WFPC will continue to analyze the Commission report to map agreed upon solutions to this emerging problem, and to endorse specific recommendations.

The IAFC supports monitoring of forward progress of the Commission report recommendations through assigning and entrusting an oversight body to provide annual reports to Congressional Wildfire Caucus and Congressional Fire Services Caucus to include representatives from USDA Forest Service, U.S. Department of the Interior, U.S. Fire Administration, International Association of Fire Chiefs, National Association of State Foresters, Tribal representation, National League of Cities, National Association of Counties, and National Governors Association.

About the International Association of Fire Chiefs (IAFC)

The IAFC represents the leadership of firefighters and emergency responders worldwide. IAFC members are the world's leading experts in firefighting, emergency medical services, terrorism response, hazardous materials response, natural disasters, search and rescue, and public safety policy. Since 1873, the IAFC has provided a forum for its members to exchange ideas, develop professionally and uncover the latest best practices and services available for first responders. For IAFC policy information, contact the IAFC Government Relations and Policy Department at 703-273-0911 / IAFC Headquarters, 8251 Greensboro Drive, Suite 650, McLean, VA 22102.




Literature Citations

- ¹ The initial letter was mailed in January 2024. The contributors of *A Call to Action* have decided to continually update the letter with new information and additional names of supporters.
- ² It is now estimated that the annual costs of destruction from unplanned wildfires is about \$900 billion.
- ³ See Page 97, “Note”, for an explanation of “Intellectual Argument [or Narrative]”.
- ⁴ [These California cities have been destroyed from wildfires | The Sacramento Bee \(sacbee.com\)](https://www.sacbee.com/news/california/wildfires/article284944441.html)
- ⁵ <https://inciweb.nwcg.gov/incident/7690/>
- ⁶ <https://inciweb.nwcg.gov/incident/8249/>
- ⁷ <https://www.lehighvalleylive.com/news/2023/04/northeast-pa-wildfire-contained-after-burning-4376-acres-state-says.html>
- ⁸ <https://www.slttrib.com/news/environment/2023/03/30/federal-judge-tosses-out-utah/>
- ⁹ [Padilla Introduces Slate of Bills to Help California Respond and Recover from Wildfires^{\(08\)} - Senator Alex Padilla \(senate.gov\)](https://www.senate.gov/legislation/bills/117/padilla-introduces-slate-of-bills-to-help-california-respond-and-recover-from-wildfires-08)
- ¹⁰ [Barrasso: America’s Western Forests are Facing a Wildfire Crisis - U.S. Senate C...](https://www.senate.gov/legislation/bills/117/barrasso-america-s-western-forests-are-facing-a-wildfire-crisis)
- ¹¹ [Geographic Area Coordination Center \(GACC\) Website Template \(nifc.gov\)](https://www.nifc.gov/geographic-area-coordination-center-gacc-website-template)
- ¹² In this *Call to Action*, the term *forest* represents more than just trees. For example, the Chaparral Forests of southern California and the wide-range of vegetation that make up the urban gradient, specific to the Wildland-Urban Interface.
- ¹³ USDA: United States Department of Agriculture.
- ¹⁴ DOI: Department of Interior.
- ¹⁵ Petition Link: <http://chng.it/bGsyZvSb>
- ¹⁶ <https://www.worldometers.info/coronavirus/>
- ¹⁷ Wildfire Today™ reported on September 2, 2020 that 222 wildland firefighters have tested positive for COVID-19 and one has died. To date, actual numbers are hard to determine.
- ¹⁸ <https://theconversation.com/smoke-from-wildfires-can-worsen-covid-19-risk-putting-firefighters-in-even-more-danger-145998>
- ¹⁹ <https://uhs.berkeley.edu/sites/default/files/smokecovid19factsheet.pdf>
- ²⁰ Geographic Action Plans to help address COVID-19: <https://www.nifc.gov/fireInfo/covid-19.htm>
- ²¹ A separate companion document to the *Call to Action* is also available highlighting the “Top 10 Action.”
- ²² Based on results, weather patterns so far, including the lack of precipitation, indication are the 2021 fire season will be equally as destructive as 2020, perhaps more.
- ²³ [Some COVID deaths are linked to Western wildfires, study shows | Fox News](https://www.foxnews.com/science/some-covid-deaths-linked-western-wildfires-study-shows)
- ²⁴ [Rep. McClintock and Rep. LaMalfa Introduce Legislation Requiring the USDA Forest Service to Immediately Suppress Wildfires | Congressman Tom McClintock \(house.gov\)](https://www.house.gov/legislation/record/117/rep-mcclintock-and-rep-lamalfa-introduce-legislation-requiring-the-usda-forest-service-to-immediately-suppress-wildfires)
- ²⁵ [Here's Why Wildfire Experts are Worried About an EPA Plan for Cleaner Air | KQED](https://www.kqed.org/news/11764444/heres-why-wildfire-experts-are-worried-about-an-epa-plan-for-cleaner-air)
- ²⁶ <https://www.nbcnews.com/science/environment/year-wildfire-smoke-us-faces-brutal-season-rcna92453>
- ²⁷ Pre-positioning in order to be more efficient and effective in fire suppression was carefully addressed in a letter to the USDA Secretary by the National Wildfire Institute dated May 4, 2020.
- ²⁸ The Department of Interior will need to review their level of resources, as well.
- ²⁹ In response to the Senator Wyden-led letter addressed to the Forest Service Chief on April 30, 2020.
- ³⁰ Congress is considering the Infrastructure Investment and Jobs Act. About \$3.3 billion is being targeted for “wildfire risk reduction” – about \$680 million annually for 5 years. This represent about 25 percent of the total needs.
- ³¹ Even with the funding provided in the infrastructure legislation, this represents only about 25 percent of Forest Service requirements.
- ³² Current predictions indicate the 2021 fire season will more destructive. And, when reviewing the 2021 Omnibus Spending Bill just approved, there is a status quo budget in terms of forest maintenance.
- ³³ [As wildfires grow, poor, elderly disproportionately affected - Stateline](https://www.stateline.com/story/news/2021/07/19/as-wildfires-grow-poor-elderly-disproportionately-affected)
- ³⁴ On July 19, 2021, several conservation professionals, under the leadership of Philip S. Aune [Program Manager (RET), Pacific Southwest Research Station], discussed the concept of “managed wildfire” and concluded that under the current time, its use is completely inappropriate. The group – known as the “Call to Action Group” -- has shared its views with the new Forest Service Chief, Randy Moore for his consideration.
- ³⁵ The term “natural” is often used by states and the federal government to describe the type of wildfire. Sometimes, the term “unplanned” is used. The terms have been used interchangeably. For example, a *natural* lightning strike causing a wildfire is *unplanned*. Prescribed fires are *planned*. They are not *natural* or *unplanned*.
- ³⁶ Derr, William. United States Forest Service (Ret.). Email correspondence. May 18, 2020.
- ³⁷ <https://www.sfgate.com/california-wildfires/article/california-fire-lookout-dies-in-mckinney-fire-17359736.php>
- ³⁸ [Some COVID deaths are linked to Western wildfires, study shows | Fox News](https://www.foxnews.com/science/some-covid-deaths-linked-western-wildfires-study-shows)
- ³⁹ [Ecologists say climate change makes controlled fires more urgent and dangerous : NPR](https://www.npr.org/2021/07/19/eco-01-wildfires-climate-change/)
- ⁴⁰ A classic case is the Tamarack Fire in Northern California. [Tamarack Fire Information - InciWeb the Incident Information System \(nwcg.gov\)](https://www.inciweb.org/incident/tamarack-fire). The fire started on July 4, 2021 and was “monitored” for 13 days before any action. As of August 26, 2021, the Tamarack Fire is 68,696 acres burned and still not fully contained. Go to “Top 10 Action” No. 3, page 5. This incident did not have to turn out this way.
- ⁴¹ Congressman Tom McClintock [CA-4-R] weighs in: [Rep. McClintock Requests Information About Tamarack Fire Response | myMotherLode.com](https://www.mymotherlode.com/2021/08/26/rep-mcclintock-requests-information-about-tamarack-fire-response/)

- ⁴² Stubblefield, Ted. Forest Supervisor, United States Forest Service (Ret.). Email correspondence. October 30, 2020.
- ⁴³ See Page 97 for more information on this “intellectual argument” called “managed fire.”
- ⁴⁴ “Never” is a long time. But, let’s be pragmatic. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn, for whatever reason, for the foreseeable future, is unacceptable and must be stopped now.
- ⁴⁵ [8.2.21 USDA Letter \(ca.gov\)](#)
- ⁴⁶ [USDA chief calls for overhaul of forest maintenance in western states ~ Missoula Current](#)
- ⁴⁷ [Forest Service Chief says wildfires will be suppressed, rather than “managed”, for now - Wildfire Today](#)
- ⁴⁸ Unfortunately, after only 140 days, America’s Chief Forester has reversed his position on “managed fire” [letter dated December 22, 2021]. This will not bode well for the 2022 fire season. We should expect extended damage and loss.
- ⁴⁹ <https://www.evergreenmagazine.com/conversation-with-randy-moore/#:~:text=A%20conversation%20with%20Forest%20Service%20Chief%2C%20Randy%20Moore,that%20will%20remain%20challenges%20long%20after%20he%20retires.>
- ⁵⁰ The annualized economic burden from wildfire is estimated to be between \$71.1 billion to \$347.8 billion (\$2016 US). NIST Special Publication 1215. The Costs and Losses of Wildfires: A Literature Survey. Douglas Thomas, David Butry, Stanley Gilbert, David Webb and Juan Fung. Applied Economics Office Engineering Laboratory. November 2017.
- ⁵¹ Wildfire Today, October 8, 2020, reporting on an NPR article.
- ⁵² [TrueCostOfWilfire.pdf \(blm.gov\)](#)
- ⁵³ [Dixie Fire \(CA\) Information - InciWeb the Incident Information System \(nwcg.gov\)](#)
- ⁵⁴ [Caldor Fire | Welcome to CAL FIRE](#)
- ⁵⁵ <https://nmfireinfo.com/>
- ⁵⁶ <https://www.inquirer.com/science/climate/new-jersey-pinelands-pine-barrens-20210518.html>
- ⁵⁷ https://www.fs.fed.us/climatechange/advisor/scorecard/Carbon_Infographic_Final.pdf
- ⁵⁸ <https://news.cornell.edu/stories/2017/06/rising-seas-could-result-2-billion-refugees-2100>
- ⁵⁹ https://www.fire.ca.gov/media/5121/campfire_cause.pdf
- ⁶⁰ [Estimated TOTAL cost of the Camp Fire was about \\$422 billion - Wildfire Today](#)
- ⁶¹ The Enterprise-Record. November 8, 2019.
- ⁶² For the latest fire statistics, use this website: <https://www.nifc.gov/fireInfo/nfn.htm> See also [Incident Activity Charts and Tables](#).
- ⁶³ 2019 wildland fire statistics: Number of Fires [50,477] and Acres Burned [4,664,364]. That is about the same number of 2021 fires and 68 percent of the acres burned, compared to the current 2021 fires season.
- ⁶⁴ As of December 22, 2021, there has been 57,222 fires that have burned just over 7.3 million acres.
- ⁶⁵ [Wildfire solutions | Stanford News](#)
- ⁶⁶ [Wildfire smoke increases inflammation, lung disease risk \(ucdavis.edu\)](#)
- ⁶⁷ [Fires Are Intensifying. Here’s How to Protect Your Health. - The New York Times \(nytimes.com\)](#)
- ⁶⁸ B. Ford, M. Val Martin, S. E. Zelasky, E. V. Fischer, S. C. Anenberg, C. L. Heald, J. R. Pierce. Future Fire Impacts on Smoke Concentrations, Visibility, and Health in the Contiguous United States. *GeoHealth*, 2018.
- ⁶⁹ <https://grist.org/article/44000-americans-could-end-up-dying-from-wildfire-smoke-every-year/>
- ⁷⁰ <https://www.bbc.com/news/live/world-us-canada-65835239>
- ⁷¹ <http://usclimateandhealthalliance.org/wildfires-public-health-view-front-lines/>
- ⁷² <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>
- ⁷³ [UMass Amherst Researcher Reveals Link Between Wildfire Smoke and Increased Suicide Risk in Rural Counties – India Education | Latest Education News | Global Educational News | Recent Educational News \(indiaeducationdiary.in\)](#)
- ⁷⁴ [Wildfire smoke is particularly harmful to kids’ respiratory health, study finds \(statnews.com\)](#)
- ⁷⁵ Recent [2020] studies by Stanford University [researchers say smoke](#) from the recent California wildfires led to 1,200 excess deaths and 4,800 additional ER visits among the elderly – and that’s just for people ages 65 and over.
- ⁷⁶ Y. Claire Change. [Caring for Skin After Wildfire Smoke Exposure and Irritation | Allure](#) [Dougher, K.9/24/2020].
- ⁷⁷ <https://iopscience.iop.org/article/10.1088/1748-9326/ac30f6>
- ⁷⁸ [Smoke from Canadian wildfires choke skies across America's northern tier \(foxweather.com\)](#)
- ⁷⁹ <https://www.cbsnews.com/news/2019-wildfire-season-smoke-from-wildfires-increases-health-risks-for-millions-of-americans/>
- ⁸⁰ [Some COVID deaths are linked to Western wildfires, study shows | Fox News](#)
- ⁸¹ <https://www.theguardian.com/environment/2022/sep/22/air-quality-wildfire-smoke-pollution-health-risks>
- ⁸² <https://www.cnn.com/2023/05/19/americas/canada-wildfires-us-smoke-air-quality/index.html>
- ⁸³ [A third of southern Sierra Forest lost to drought, wildfire - Los Angeles Times \(latimes.com\)](#)
- ⁸⁴ Changed from “...the impacts of a changing climate” to a reflect a more contemporary notion.
- ⁸⁵ <https://www.c2es.org/content/wildfires-and-climate-change/>
- ⁸⁶ <https://www.noaa.gov/noaa-wildfire/wildfire-climate-connection#:~:text=Research%20shows%20that%20changes%20in,fuels%20during%20the%20fire%20season.>
- ⁸⁷ For example, the Chaparral Forests of Southern California and the wildland-urban forests [a wide-range of vegetation and tree species] are in critical need of improved maintenance. Fuels treatment represent far more than just trees.
- ⁸⁸ Daley, Jad. *New Math: Climate Change = More Fire = More Climate Change*. American Forests. Nov 27, 2018.
- ⁸⁹ Berwyn, Bob. How Wildfires Can Affect Climate Change (and vice versa). Inside Climate News. August 23, 2018.
- ⁹⁰ The Paris Agreement [Accord de Paris]. United Nations Framework Convention on Climate Change [UNFCCC]. 2015.

- ⁹¹ <https://www.americangeosciences.org/webinars/wildfire-maintenance-in-the-21st-century>
- ⁹² https://www.democrats.senate.gov/imo/media/doc/inflation_reduction_act_of_2022.pdf
- ⁹³ See Appendix A.1. The +\$3.61 billion is based on documented needs. The +\$2.2 billion represents *minimal* requirements. The primary difference is due to resource requirements for hazardous fuels reduction.
- ⁹⁴ These estimates are for the Forest Service only. Additional amounts, if any, will need to also be determined for the DOI.
- ⁹⁵ After adjusting for LWCF [Land and Water Conservation Fund] and a restructure of the Forest Service budget, the 2021 budget appears to represent a net increase of about \$19 million; essentially a status quo budget.
- ⁹⁶ Indications are about 0.3 percent, or approximately \$3,369,000,000 in this \$1 trillion infrastructure bill is directed at wildland fire reduction. See [A Senate infrastructure bill will address many wildlands fire issues - Wildfire Today](#).
- ⁹⁷ [LaMalfa laments blockage of fire reform, firefighters pay increase efforts | Corning Observer | appeal-democrat.com](#)
- ⁹⁸ The 2022 proposed budget includes an increase of \$476 million for hazardous fuels treatment. If enacted, this would bring the total funding level for hazardous fuels treatment for the Forest Service to about \$989 million or about 40 percent of needs.
- ⁹⁹ [Congress appropriates \\$3.3 billion for wildland fire - Wildfire Today](#)
- ¹⁰⁰ See time 11:53 of the Cabinet meeting: <https://www.youtube.com/watch?v=mNddZ4cwzRU>
- ¹⁰¹ Rains, Michael T. Forest Maintenance and Fire Management: In Sync or at Odds [A “Short Paper”]. November 20, 2018.
- ¹⁰² Comments made while serving as the Deputy Chief for the National Forest System, United States Forest Service.
- ¹⁰³ U.S. Forest Resource Facts and Historical Trends. USDA Forest Service, FS-1035. 2014: https://www.fia.fs.fed.us/library/brochures/docs/2012/ForestFacts_1952-2012_English.pdf
- ¹⁰⁴ [LaMalfa Introduces RESTORE Act to Improve Forest Health, Mitigate Wildfire Risk | Congressman Doug LaMalfa \(house.gov\)](#). The proposed legislation would be a solid “...set of good tactics that would fit nicely into a more cohesive Call to Action.”
- ¹⁰⁵ Vegetation management includes a wide-range of vegetation types and tree species. Perhaps a newer phrase in our communications needs to emerge. That is, instead of the lack of *forest management* we should say, lack of *vegetation maintenance* or the lack of *forest maintenance*. Our forests are more than just trees!
- ¹⁰⁶ [California’s forests are packed with dead trees. Harvesting them could cut wildfire risk. » Yale Climate Connections](#)
- ¹⁰⁷ Initially, due to lack of capacity and funding and other constraints, a goal of about 5-7 million additional acres annually would be a very reasonable objective, especially if these acres are targeted to the highest priority “firesheds.” As capacity and funding increase, the pace and scale of forest maintenance will also increase.
- ¹⁰⁸ https://www.fpl.fs.fed.us/documnts/pdf2014/fpl_2014_rains001.pdf
- ¹⁰⁹ <https://www.youtube.com/watch?v=wFVUw5duyb4>
- ¹¹⁰ The 2021 Omnibus Spending Bill does not provide any increase in funding for Research and Development and specifically for biomass uses. Thus, in terms of funding and focus, nothing has changed.
- ¹¹¹ [Home | California Fire Safe Council | Learn More Today \(cafiresafecouncil.org\)](#)
- ¹¹² [NFPA - Firewise USA®](#)
- ¹¹³ [Hardening Your Home - Ready for Wildfire](#)
- ¹¹⁴ [U.S. West Coast races to reduce wildfire risk ahead of summer | Reuters](#)
- ¹¹⁵ [Wildfire Survivors on Firewise and Protecting Your Home: Bruce Courtright and Catherine Barash - YouTube](#)
- ¹¹⁶ [AFUE FINAL REPORT.pdf](#)
- ¹¹⁷ [Identifying a Cost-Effective Aviation Fleet for the USDA Forest Service | RAND](#)
- ¹¹⁸ ["It's a war": California turns to new, high-tech helicopters to battle wildfires — 60 Minutes - CBS News](#)
- ¹¹⁹ See Appendix A.5.
- ¹²⁰ [Smokejumpers.com - National Smokejumper Association](#)
- ¹²¹ When the Tamarack Fire in California started on July 4, 2021, Smokejumpers were readily available but not deployed while the fire was being “monitored.” As of October 26, 2021, the fire burned 68,637 acres in size and is now 100 percent contained. [Tamarack Fire Information - InciWeb the Incident Information System \(nwcg.gov\)](#)
- ¹²² Recently [August 4, 2021], USDA Secretary Vilsack talked about the positive impacts of forest maintenance and his commitment to emphasize the care of our forests. [USDA chief calls for overhaul of forest maintenance in western states | Courthouse News Service](#)
- ¹²³ See the Wildland Fire Mitigation and Management Commission Report Outlining Comprehensive Recommendations to Change the Nation’s Relationship with Wildfire, page 148.
- ¹²⁴ [Wildland Fire Mitigation and Management Commission](#).
- ¹²⁵ [Commission established to evaluate wildland fire mitigation, management, and aircraft - Wildfire Today](#)
- ¹²⁶ [Title II: Wildfire Mitigation \(usda.gov\)](#)
- ¹²⁷ [wfmmc-final-report-09-2023.pdf \(usda.gov\)](#)
- ¹²⁸ [wfmmc-final-report-09-2023.pdf \(usda.gov\)](#) This Report was released to Congress on September 27, 2023. Respectfully, the report provides nothing new. Like *A Call to Action*, the report does suggest we are faced with a national emergency and we can no longer languish in inaction. Enough is enough.
- ¹²⁹ <https://www.fs.fed.us/sites/default/files/toward-shared-stewardship.pdf>
- ¹³⁰ <https://www.fs.fed.us/sites/default/files/toward-shared-stewardship.pdf>
- ¹³¹ <https://www.forestsandrangelands.gov/strategy/thestrategy.shtml>
- ¹³² <https://www.wsj.com/articles/western-forest-wildfire-firefighter-crew-california-11637425808>
- ¹³³ <https://www.nafsr.org/advocacy/2019/072619%20Workforce%20Capacity%20Study.pdf>

- ¹³⁰ <https://www.nafsr.org/advocacy/2021/042921%20Cover%20Letter%20to%20Congress%20on%20America's%20Forest%20Maintenance%20Emergency.pdf>
- ¹³¹ Additional costs ranged between +\$130 up to +\$250 per acres burned in 2020 [projections estimate 2023 will be the same or higher]. This includes new suppression tactics [“preparedness closer to the incident”]; new skill sets in and around incidents; equipment; medical assistance; backup personnel due to sickness; etc.]. The projection for 2022 is in the range of about 7.1 to 10.2 million acres burned [the actual count was 7.3 million acres]. Costs are expected to exponentially increase above 8.8 million acres. The estimates, additional annual costs, also include additional resources for hazardous fuels reduction and delayed maintenance of forestlands based on questions presented in the Senator Wyden-led letter to the Forest Service Chief on April 30, 2020.
- ¹³² The USDA Forest Service budget for 2021 is status quo. The additional needs for 2021 that are illustrated in Appendix A.1 remaining basically the same. The 2022 proposed budget includes \$1.7 billion for high-priority hazardous fuels and forest resilience projects, an increase of \$476 million over the 2021 enacted level.
- ¹³³ <HHRG-117-AP06-Wstate-ChristiansenV-20210415.pdf> (house.gov)
- ¹³⁴ Currently in the process of updating costs.
- ¹³⁵ https://inflationdata.com/Inflation/Inflation_Rate/CurrentInflation.asp?reloaded=true
- ¹³⁶ Prepared by Michael T. Rains on February 23, 2021 [revised].
- ¹³⁷ [Defensible Space - Ready for Wildfire](#)
- ¹³⁸ [Hardening Your Home - FIREsafe MARIN](#)
- ¹³⁹ Prepared by Phil Aune, September 7, 2021. While with the USFS, Aune was a Silviculture Research Program Manager for PSW 1987-2000; Forest Silviculturist Tahoe NF 1975-1987; Silviculturist Mad River Ranger District 1970-1975; Forestry Tech and Forester 1962-1970. Additionally, he was Vice President of the California Forestry Association 2000-2005 and Consultant to the American Forest Resource Association 2006-2012.
- ¹⁴⁰ In 1935, Chief Forester of the USFS, Ferdinand “Gus” Silcox, utilized the Civilian Conservation Corps [CCC] to develop a uniform fire policy. The result was Silcox’s “10 a.m. policy,” a directive that demanded that all wildfires, regardless of how remote, be brought under control by 10 a.m. the morning following ignition. In 1978, the USFS abandoned the policy and adopted a more ecological approach to wildfire management, which included the use of prescribed fire to minimize catastrophic fires.
- ¹⁴¹ Condition Class 3: Lands where fire regimes have been significantly altered from their historical range. The risk of losing key ecosystem components is high.
- ¹⁴² Condition Class 2: Lands where fire regimes have been moderately altered from their historical range. The risk of losing key ecosystem components is moderate.
- ¹⁴³ [Watersheds \(umd.edu\)](#).
- ¹⁴⁴ Defensible Fuel Profile Zones [DFPZ] create openings in the landscape to alter wildfire behavior and decrease fire intensity, https://www.fs.fed.us/pnw/pubs/pnw_gtr048.pdf
- ¹⁴⁶ Prepared by Jim Marsh, January 1, 2022. While with the Forest Service was Forester /Watershed Scientist on the Brownstown District Wayne Hoosier National Forest, Ukonom and Scott River Districts of the Klamath NF. Forest Hydrologist, Shasta -Trinity National Forest and Regional Hydrologist, Region 5, California. Was District Ranger, Mad River District. And, Aviation, Fire, Lands, Minerals, and Law Enforcement Staff Officer, Six Rivers NF over a 17-year period. Additionally, was the Assistant Chief of Staff, Environment, Natural Resources and Training Lands Management for the Marine Corps Combat Development Command, Quantico, VA. After a federal career, Jim was CEO of an Environmental Consulting company, staff member for Texas A and M University Research and Extension and on the Board of Directors for several consulting and service companies currently.
- ¹⁴⁷ <https://www.fs.usda.gov/managing-land/forest-stewardship/program>
- ¹⁴⁸ https://www.nationalforests.org/assets/files/Stewardship-Authority-Overview_2014-7-24.pdf
- ¹⁴⁹ <https://forestsandrangelands.gov/stewardship/index.shtml>
- ¹⁵⁰ <https://crsreports.congress.gov/product/pdf/IF/IF11658/3>
- ¹⁵¹ <https://www.govinfo.gov/app/details/USCODE-2015-title16/USCODE-2015-title16-chap41-sec2113a>
- ¹⁵² <https://www.federalregister.gov/documents/2016/12/15/2016-30191/national-forest-system-land-management-planning>
- ¹⁵³ <https://www.fs.usda.gov/detail/flathead/news-events/?cid=FSEPRD957653>
- ¹⁵⁴ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb3843429.pdf
- ¹⁵⁵ <https://scholarworks.umt.edu/etd/4594/>
- ¹⁵⁶ <https://www.fs.usda.gov/managing-land/shared-stewardship/northern/case-study-montana>
- ¹⁵⁷ <https://www.fs.usda.gov/detailfull/flathead/home/?cid=stelprdb5422786&width=full>
- ¹⁵⁸ Flathead National Forest Plan, page 52.
- ¹⁵⁹ <https://www.montanaforestactionplan.org/>
- ¹⁶⁰ Montana Forest Action Plan, page 41.
- ¹⁶¹ <https://mwra-mtdnrc.hub.arcgis.com/>
- ¹⁶² Montana Forest Action Plan, page 44.
- ¹⁶³ <http://dnrc.mt.gov/divisions/forestry/fire-and-aviation/cwpps>
- ¹⁶⁴ Montana Department of Natural Resources and Conservation.
- ¹⁶⁵ Flathead Country, CWPP, 2020, page 96.
- ¹⁶⁶ “Counties on Fire”  1st Issue - Lincoln County (mailchi.mp)

- ¹⁶⁷ <https://www.evergreenmagazine.com/>
- ¹⁶⁸ Sent by Michael T. Rains on December 8, 2021 to a wide-range of interests in today’s wildfire situation.
- ¹⁶⁹ Note From Michael T. Rains. Regarding my consistent declaration of “Not Now”, is this what I really mean? For now, the answer is “yes.” I am not about “never”, but for now and the foreseeable future, I am for prescribed fire and against the current concept of managed fire. I just cannot see the land conditions changing to a level that would allow for managed fire – probably in my lifetime. Am I hedging at bit? Yes. But, I have come a long way in recent years. Thus, my hedge of “Not Now” or like Murry Taylor says, is “for the time being.”
- ¹⁷⁰ Prepared by Michael T. Rains.
- ¹⁷¹ Dave Rosgen, P.H., Ph.D, Wildland Hydrology, Ft. Collins, Colorado, February 14, 2022.
- ¹⁷² Each year, the Chief of the United States Forest Service develops a *Letter of Intent* that attempts to outline the vision for wildfire suppression. This year, Representatives McClintock and LaMalfa provided input for the pending letter to be considered by America’s Chief Forester.
- ¹⁷³ [Padilla Introduces Slate of Bills to Help California Respond and Recover from Wildfires^{\(08\)} - Senator Alex Padilla \(senate.gov\)](#). May 2022.
- ¹⁷⁴ XIMENA BUSTILLO
- ¹⁷⁵ Rachel Hall: fanfourplus@gmail.com
- ¹⁷⁶ As the 2022 fire season had ended, the “Transitioning the *A Call to Action* into 2023” will be used, in part, to capture current, relevant thoughts to help make changes for the 2023 fire season. We must pledge to keep the momentum going to address this National Emergency.
- ¹⁷⁷ [El Dorado Incident – Organizational Learning Review \(wildfirelessons.net\)](#)
- ¹⁷⁸ Dave Rosgen, P.H., Ph.D. With sincere apologies to Dr. Rosgen, I have greatly summarized his input in this “Transition” section. His more detailed contribution is provided in Appendix A.8.
- ¹⁷⁹ Each year, the Chief of the United States Forest Service develops a *Letter of Intent* that attempts to outline the vision for wildfire suppression. This year, Representatives McClintock and LaMalfa provided input for the pending letter to be considered by America’s Chief Forester.
- ¹⁸⁰ Frank Carroll, Managing Partner, PFMc Wildfire Pros, Frank@WildfirePros.com [April 2022].
- ¹⁸¹ Bruce Courtright, Director, National Wildfire Institute.
- ¹⁸² See Appendix A.5. This helps quantify acres that did not have to burn. Very conservative estimates suggest 27 percent of the wildfire acres in 2021 did not have to burn if there was a more aggressive initial suppression response.
- ¹⁸³ **Note:** Appendices A.15; A.15.1; and A.15.2 are linked. They focus of the issue of “Prescribed Fire” and a designated “pause.” The basic thesis in this “Call to Action” is to “pause” for the rest of the 2022 fire season. There is only one answer. That is, strive to put out all unplanned wildfire ignitions immediately; no exceptions. WE SIMPLY CANNOT EQUOCATE OF THIS STANCE – NOT NOW.
- ¹⁸⁴ “Wildfire News of the Day.”
- ¹⁸⁵ Brett L’Esperance, CEO Dauntless Air, June 20, 2022.
- ¹⁸⁶ Michael T. Rains, mtrains7@verizon.net, June 20, 2022.
- ¹⁸⁷ Some additional thoughts by Michael T. Rains, June 21, 2022.
- ¹⁸⁸ <https://wildfiretoday.com/2022/06/18/cbs-probes-recruiting-and-retention-problems-in-the-us-forest-service/>
- ¹⁸⁹ [The Forest Service Announces an Emergency Plan to Save Giant Sequoias - Government Executive \(govexec.com\)](#) [Julia Kane, Grist, July 27, 2022].
- ¹⁹⁰ Prepared by William Derr, July 21, 2022.
- ¹⁹¹ The notion of “managed fire” creates lots of smoke. Estimates are as many as 14,000 to 50,000 people are dying due to wildfire smoke each year. See [page 14](#) of this document.
- ¹⁹² <https://www.fire.ca.gov/incidents/2022/9/2/mill-fire/>
- ¹⁹³ <https://www.sacbee.com/news/california/fires/article265289971.html>
- ¹⁹⁴ Ibid.
- ¹⁹⁵ Rains, Michael T. Former USDA Forest Service employee.
- ¹⁹⁶ [Mill Fire destroys Black neighborhood in Weed, California | The Sacramento Bee \(sacbee.com\)](#)
- ¹⁹⁷ Rains, Michael T. September 10, 2022.
- ¹⁹⁸ From NACo 2022 Annual Conference: Platform Changes and Policy Resolutions, July 24, 2022.
- ¹⁹⁹ Nancy O. Geehan, primary author of resolution and consultant to the County Executive sponsors.
- ²⁰⁰ Compiled by Bill Derr, October 13, 2022.
- ²⁰¹ <https://www.publiclandsforthepeople.org/wp-content/uploads/2015/05/ORGANIC-ACT-OF-1897.pdf>
- ²⁰² From NACo 2022 Annual Conference: Platform Changes and Policy Resolutions 07.24.22
- ²⁰³ For me [Rains], this story was especially poignant. I worked on the Plumas National Forest and, as a Forest Hydrologist, was extremely familiar with the once magnificent landscapes.
- ²⁰⁴ Dave Daley, Butte County Rancher and California Cattleman’s Association Immediate Past President, September 23, 2022.
- ²⁰⁵ Ibid.
- ²⁰⁶ Jim Petersen, Evergreen Foundation, September 2022.
- ²⁰⁷ Michael T. Rains, Substitute Teacher, Commonwealth of Pennsylvania and former USDA Forest Service employee, September 30, 2022. To be included in a future edition of *Smokejumper Magazine*.
- ²⁰⁸ Rains, Michael T. A phrase, “intellectual argument”, when referring to “manage” or “beneficial” fire.

- ²⁰⁹ From Healthy Forests, Healthy Communities. *Top Senators introduce bipartisan “Promoting Effective Management Act”* [nick@healthyforests.org], October 7, 2022. <https://www.congress.gov/bill/117th-congress/senate-bill/4904?s=1&r=5>
- ²¹⁰ Nancy O. Geehan is an experienced principal consultant with a demonstrated history of working in the communications and storytelling arena. Highly skilled in policy making, leading diverse teams, building partnerships with measurable results, development of organizations, Environmental Issues, Natural Resources, Natural Resource Management, Conservation Issues, and Sustainability. Strong consulting and storytelling professional with a Bachelor of Science (BS) focused in Natural Resources Management and Policy Making from the University of Wyoming. nancyogeehan@hushmail.com
- ²¹¹ wildfire-suppression-funding-and-forest-management-activities-act-division-o-of-the-consolidated-appropriations-act-2018-pub-l-115-141-132-stat-348-march-23-2018-h-r-1625-11. Prepared by: Joe Reddan, CA RPF # 3187, Chief Forester, Flexilis Forestry LLC, 1203 Everest Avenue, American Canyon, CA 94503. May 2, 2023.
- ²¹² Principals of Federal Appropriations Law Fourth Edition 2016 Revision
- ²¹³ [WO AMENDMENT 5100-2020-1 \(WO_FSM 5100_5130-2020.docx\)](#)
- ²¹⁴ <https://www.fs.usda.gov/inside-fs/leadership/leaders-intent-2018-summary-fire-year>
- ²¹⁵ https://wildfiretoday.com/documents/PoleCreek-BaldMtn_FLA_Final.pdf
- ²¹⁶ Prepared by Carroll, Franklin O. Opinion Editorial: Burning the Forest and the Trees. PFMc Wildfire Pros. Forestry, Range Science, Wildfire forensics and policy. WildfirePros.com. May 2023. Frank Carroll is a veteran of 50 years of wildland fire expertise consulting in international wildland fire practice. Frank’s years of wildfire forensics and policy analysis included 30 years in the US Forest Service. Frank can be reached at Frank@WildfirePros.com and WildfirePros.com.
- ²¹⁷ Prepared by Phil Aune, May 30, 2023 [as part of an email exchange].
- ²¹⁸ Rains, Michael T. [USDA Forest Service, retired].
- ²¹⁹ <https://www.npr.org/2023/12/21/1220594184/2023-was-a-tragic-and-bizarre-year-of-wildfires-will-it-mark-a-turning-point#:~:text=In%20Hawaii%20on%20Aug.,historic%20tourist%20town%20of%20Lahaina>.
- ²²⁰ Prepared by Michael T. Rains with comments included from a wide-range of professionals; 73 and counting. This paper focuses on eight [8] critical actions that must be deployed to help reduced the destructive impacts of unplanned wildfires. The goal is to apply these 8 actions to local conditions to show lasting, meaningful results. Last update: 4/27/2024 12:12:56 PM.
- ²²¹ I [Rains] worked on the Six Rivers National Forest and I have a solid knowledge of the terrain of the recent Smith River Wildfire Complex [see page 130 of *A Call to Action*, rev. 17.2, November 7, 2023].
- ²²² *A Call to Action*.
- ²²³ *A Standards of Cover* consists of decisions made regarding the placement of field resources in relation to the potential demand placed on them by the type of risk and historical needs of the community. The outcome must demonstrate that lives are saved and properties are protected.
- ²²⁴ Rains, Michael T. [USDA Forest Service, retired].
- ²²⁵ Press Release, USDA, September 28, 2023.
- ²²⁶ Press Release, USDA, September 27, 2023.
- ²²⁷ Written by Bill Dennison (retired logger and forester), Nancy O. Geehan (Sweetgrass--Dedicated to Getting the Politics Out of Our Nation’s Natural Resources and Environmental Policy) and Heather Smith Thomas (rancher/writer).
- ²²⁸ Curt Weidmer, October 6, 2023.
- ²²⁹ Accessed September 20th 2019 [Forest History](#)
- ²³⁰ Several individuals have commented on this definition. But the two primary contributions are Bill Derr and Bill Dennison, October 2023.
- ²³¹ http://www.nifc.gov/fire_policy/docs/chp1.pdf
- ²³² Aaron Labaree, Slate, November 30, 2021.
- ²³³ USDA Forest Service Chief’s Annual Letter of Intent for Wildfire.
- ²³⁴ Los Angeles Times, August 6, 2021.
- ²³⁵ William A Derr, Special Agent in Charge, California Region, USDA Forest Service [ret.], October 18, 2023.
- ²³⁶ Guy McMahan, Curry Wildfire Prevention/New Co., with significant contributions by others including Bob Zybach and Bill Derr. October 22, 2023
- ²³⁷ Refers to managed, beneficial, let-it-burn, and/or backing off to the next best ridge concepts.
- ²³⁸ <http://www.scottchurchdirect.com/conservation.aspx/spotted-owl-overview>
- ²³⁹ [Wildfires are now costing the US up to \\$900 billion annually \(qz.com\)](#)
- ²⁴⁰ A Dialogue by Phil Aune and Ray Quintanar, November 10, 2023
- ²⁴¹ Michael T. Rains, November 11, 2023.
- ²⁴² Authors Roger Jaegel and James Montgomery discuss the destruction of Ruth, a small northern California town leveled by the 2020 August Complex fire.
- ²⁴³ *Blowtorch Forestry*, Interview of Frank Carroll by Jim Peterson, Editor Evergreen Magazine, April 28, 2020. Included in *A Call to Action*, with permission by Chuck Sheley, December 8, 2023 [Smokejumper Magazine, January 2024].
- ²⁴⁴ Williams, Robert. Pine Creek Forestry, New Jersey.
- ²⁴⁵ <https://www.tahoedailytribune.com/news/judge-dismisses-tamarack-fire-case/>
- ²⁴⁶ <https://www.cbsnews.com/sacramento/news/tamarack-fire-victims-seek-over-85-million-for-damages/>
- ²⁴⁷ By Ken Pimlott [Updated July 25, 2021, San Francisco Chronical].
- ²⁴⁸ Prepared By: Ken Pimlott is the retired Director of Cal Fire. Email: kenp1966@comcast.net
- ²⁴⁹ Although a poll has not been taken, the sentiment of “ignoring our recommendations” seems widespread.

²⁵⁰ While Appendix A.48.4 reflects the opinions of many, I solely composed the text in “Some Additional Thoughts by the National Wildfire Institute and Others” and take full accountability for it [Rains, Michael T., April 27, 2024].

²⁵¹ Bruce Courtright passed away in 2023. A former USDA Forest Service employee, he was a “...Giant among us lesser souls,” I [RAINS] have known Bruce for almost 50 years. He loved the Forest Service and was constantly striving to make it a better organization. This article was published in the Evergreen Magazine in an attempt to improve the Forest Service and its conservation mission. Bruce Courtright will be forever missed.

²⁵² The concept of addressing an unplanned wildfire with tactics known as “managed”, “beneficial”, “move to the next best ridge” or “let it burn” fire is gaining considerable attention. Many believe that not putting out fires immediately is a sound practice. This notion is abhorrent to others. This fight over appropriate unplanned wildfire suppression tactics continues. Appendix A.50 provides another “Thinkpiece” on this subject.

²⁵³ In response to the Wildland Fire Mitigation Commission final report to Congress, September 27, 2023.