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*Swan View Coalition *Friends of the Bitterroot *Blue Mountains Biodiversity Project
*Friends of the Wild Swan *WildWest Institute *Wilderness Watch *Save Our Sky Blue Waters
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March 19, 2018

Re: Why the Wildfire Disaster Funding Act (WDFa) is Not a Fix for Wildland Fire Issues

Dear Members of the U.S. Senate and House of Representatives:

As we enter the black box that is omnibus appropriations, members may be thinking that some version of the Wildfire Disaster Funding Act (WDFa) needs to pass in order to save homes and lives and protect our forests before the next fire season begins. If so, please think again.

Passage of this policy without *extensive* restraint and direction from Congress will simply insure that more of the same ill-advised fire management policies continue. Fire suppression costs will continue to skyrocket, homes will still burn down and misguided backcountry logging and fire suppression will persist as the primary “solutions” to wildland fire issues. Considering passage of a so called “Fire Funding Fix” coupled with a rollback of National Environmental Policy Act protections to expedite logging (such as any new Categorical Exclusion (CE) for so called “hazardous fuels reduction”, better known as logging) would simply double down on our failed policies of the last two decades and make matters even worse.

Since more losses in our communities, more degradation of our forest ecosystems through logging, and more taxpayer dollars spent is certainly not what anyone who supports this legislation as a “fix” is hoping to achieve, we encourage you to oppose inclusion of these policies in any FY2018 Omnibus Appropriations Package. Below we explain why simply increasing the amount of money we throw at fire suppression costs, which will free up even more money for logging (which may or may not be expedited through new harmful and unnecessary CEs), will not fix the issue of community protection or foster ecosystem health.

1) *The Only Way to Protect a Community is to Actually Deal with the Community:*

What dictates whether or not a home will burn in a wildfire? The materials with which a house is made, how the house is protected from flying embers, its location on the landscape, and light vegetation manipulation (pruning trees, clumping vegetation and removing some shrubs) within 100 feet of the structure (the first 30 feet from the structure being most important). The WDFa does little or nothing to address these issues, even though these represent the scientifically verified measures which make it possible for a home to have a **90%+** chance of surviving any wildland fire.

One version of the so-called “fire funding fix” being proposed would devote only about 4% of allocated funding to home protection, while the rest would go to unrestricted fire suppression with no focus whatsoever on homes. Most versions allocate no money for home protection. Overwhelmingly, the WDFPA would simply increase funding for fire suppression, with no guidance on suppression priorities and no allocation of funds for creating fireproof structures. Simply adjusting how fire suppression is funded would also create a larger pot of money to pay for more public lands logging. But whether it is a distance of 300 feet, ½ a mile or 5 miles, logging in the forest beyond the 100-foot home protection zone will not prevent the homes in the community from burning in a wildland fire, however this practice will damage our native forest ecosystems and remove essential wildlife habitat. In other words, the “fire funding fix”, might change the funding mechanism for fire suppression but it will not provide necessary protection to homes and communities and it will cause additional damage to our environment.

2) *All Fires Cannot Be Suppressed and Many Fires Should Not be Suppressed:*

First of all, fire suppression only helps to control fires that are able to be suppressed, meaning fires that are burning in low fire weather, when the temperatures aren’t too hot, the wind is not blowing consistently or at any real speed and humidity levels are not extremely low. Of course, these fires, which are capable of being suppressed, often should not be suppressed unless they occur very near a population center. Yet without constraint or clear direction from Congress these fires are typically attacked immediately after they begin, regardless of their remoteness. This is why the Forest Service promotes its fire suppression success rate of well over 90%. Unfortunately, from an ecological perspective, when dealing with ecosystems which have evolved with and depend upon fire, such as our forests, this is not a statistic to be proud of. Yet still this happens, and with more cash on hand it will happen even more often, despite a broad consensus among scientists that we should allow more wildland fires to burn, without trying to suppress them, in more remote forests.

Of course the real driver of fire suppression costs, and the perceived need for a “Fix” to fire suppression funding, is in fact the small percentage of fires that are weather driven and cannot be suppressed or even controlled regardless of the vegetation involved until winds subside, temperatures drop and humidity levels rise into the double digits. All of the large, expensive fires that have burned in the last decade and driven up fire suppression costs fall into this category. It is unclear, however, why we are spending billions of taxpayer dollars each year to fight such un-suppressable fires in the wildlands, especially fires that are burning away from communities, in ecosystems which have always had mixed intensity fire regimes (i.e., areas that need to burn with a mix of low, moderate and high intensities). A good example of taxpayer monies wasted would be the Soberanes Fire which burned in Monterey County, California in 2016. This was a wind driven fire that started near a community and consistently burned in a south and easterly direction, away from the town and into a 1.75 million acre national forest and wilderness area. Even though there was no risk to the community or private property after the first few weeks of the fire, the Forest Service continued to fight the weather driven fire, as it burned through a fire adapted ecosystem, for an additional 60 days until the weather changed in October and the fire stopped. The total cost to taxpayers was *almost a quarter of a billion dollars* (\$236,000,000), most of which was spent after community protection had ceased.

The WDFa and its ilk do nothing to restrain executive agencies from wasting money fighting fires in the wildlands, and do nothing to prioritize the fighting of fires which are adjacent to communities. History has shown us that this prioritization will not occur unless the agencies are forced to manage a limited budget and Congress directs them to use fire suppression funds in a specific way. Don't be fooled, appropriating an unfettered and immense pot of money for suppression activities will simply mean more suppression activities occur, whether or not they are necessary, whether or not they are effective and even though they are harmful to the environment.

3) *We Do Not Have More Fire in our Forests Today than We Had Historically*

The desire to put out fires in our forests in part stems from the belief that we have much more fire now than we had historically and things are simply out of control. Not so! Historically we had between 12-20 million acres burn every year in western forests alone (not including Alaska). In contrast, according to NOAA, last year (2017) in the entire country only 9.78 million acres burned. In fact as recently as 1924 thirty million acres burned in the US. We are nowhere near our historical average for acres burned per year in this country. In fact we are currently in a fire deficit of all fire types: low, moderate and high severity. So why are we spending billions of dollars to fight nearly every fire that starts, including the ones we know we should let burn as well as the large fires we know we can't put out? The only problems that need fixing here are preparing our communities to safely live with fire, and adjusting how and when we implement fire suppression (i.e. YES near communities, No in the backcountry). Dedicating billions of unfettered taxpayer dollars to suppression activities will not resolve either of these issues. The WDFa and its variants are not the answer.

4) *Yes, We Have Been Excluding Fire. No Our Forests Don't Need to Be Logged Before they Burn*

Another driving, although misguided, force behind the push to pass WDFa and similar bills is the theory that because we have suppressed fires for so long our forests are "overgrown" or "overstocked" and must be logged before we can reintroduce fire or let fires burn, otherwise our forests will burn way too hot. Thus the push to set aside a big pot of money dedicated only to fire suppression so that millions of dollars can be freed up for destructive logging under the deceptive guise of "restoration". However, this reasoning is false. How do we know? Because the overwhelming majority of scientific studies that have investigated this question, *i.e., how do areas that have not burned in a long-time burn in a fire?*, determined that regardless of the length of time since an area has burned, fires in these long-unburned forests mostly burn at low and moderate severity just as they do in forests that have burned more recently.

In comparing fire patterns in forests that had burned more recently (about 15 - 40 years since last fire) and those that were long-unburned (41-100 + years since last fire) the vast majority of these studies found that the percentage of the forest that burned at high severity* between the two categories was the same (e.g. *10-20% in Klamath Region, 20-30% in the Sierra Nevada region).

(<https://www.elsevier.com/books/the-ecological-importance-of-mixed-severity-fires/dellasala/978-0->

[12-802749-3](#)), with one study finding that in long unburned mature and old forest, the percentage of the forest that burned at high severity was lower than in recently burned forests. While another, which was not based on any field data, theorized that the long unburned forest would still mostly burn at low and moderate intensity, but might have a slightly higher percentage of the area burn at high intensity compared with forests that had more recently experienced fire.

Given that the industrialized fire suppression efforts which began post World War II and have greatly intensified in the most recent decades have not inhibited our native forests' ability to burn in a natural way, no legislation is needed which specifically designates money to suppress fires, which need to burn, in order to free up more money to facilitate and/or expedite the logging of our forests. There is no ecological problem here which necessitates a "fire funding fix", and agreeing on a "fix" would simply waste taxpayer money and harm our forest ecosystems.

5) *Fire in our Forests is Natural and Necessary to Rejuvenate these Ecosystems*

Please do not be concerned that if we do not spend more on fire suppression and logging (*a.k.a* "fuels treatments", "hazardous fuels removal", "thinning", or "restoration"), ostensibly to save our forests, that they will all be destroyed by fire. Fire is a natural and necessary part of our nation's forest ecosystems. It is what keeps them healthy and allows them to support an endlessly diverse community of native plants and animals. Every forest type in this country has a native fire regime. They all evolved with fire, and most with mixed intensity fire, where fires burn in a mosaic of low, moderate and high intensity, creating a mosaic pattern of different habitat types (heterogeneity) across the fire area and within the forest.

As discussed above all fires burn at mostly low and moderate intensity. Even large fires, like the 2013 Rim Fire which burned over 250,000 acres in California (in and near Yosemite National Park), only had high intensity fire effects on approximately 25% of the landscape that burned. But it is this small percentage of the fire areas that burn at high intensity that represent some of the best habitat in the forest. Studies have found that the biodiversity in high intensity burn areas is as rich as that found in green old growth forests (<https://www.elsevier.com/books/the-ecological-importance-of-mixed-severity-fires/dellasala/978-0-12-802749-3>).

These areas support many dozens of species of birds, including cavity nesters such as the imperiled black-backed woodpecker, hairy woodpecker and mountain bluebirds, as well as shrub nesting birds, including orange-crowned warblers, wrentits and chipping sparrows, and raptors including all sub-species of Spotted Owls. All of these species depend upon such post-fire habitat to some degree (*e.g.*, Spotted owls forage in high-intensity fire patches but nest in lightly to moderately burned areas, while Black-back woodpeckers live their entire lives in these high-intensity fire areas) and flourish in the high intensity burned areas because of the abundance of food and shelter that these areas provide. Abundant dead trees and native beetle activity allow woodpeckers to create numerous nesting cavities and raise and feed their young. Prolifically regenerating shrubs create secure nesting locations and, when they bloom, along with wildflowers, they attract bees, flies, beetles and other insects creating an abundant food source for aerial insectivores, amphibians and reptiles. The shrubs also create cover,

and the grasses, flowers and regenerating trees and their seeds provide habitat and food for small mammals, including pocket gophers, voles and moles. These small mammals become food for reptiles, raptors and medium sized carnivores, such as bobcats and foxes. Abundant grasses and regenerating trees provide forage for mule deer and rabbits, which in turn become food for larger carnivores, including coyotes, grizzly bears and mountain lions as well as omnivorous black bears. To put it simply, these rare high intensity burn areas, especially the ones that burn in mature and old forest, are rejuvenated by wildland fires. They are teeming with plant and animal life, illuminating the perfect circle of life that exists in nature: birth, life, death, renewal.

Attempts to “Fix” fire funding by writing a check to fund blanket fire suppression without extensive restraint and direction, and/or increase and expedite logging in the process, ignores the scientifically proven fact that fire is essential to our native forest ecosystems, that it renews and transforms our forests in a way which keeps them healthy and resilient and full of our native plants and animals. The W DFA is not a fix for our forest ecosystems.

6) *Wildfires Do Not Disable a Forest’s Ability to Store Carbon*

Contrary to common misconceptions, forest fires are not getting more intense, and this finding is based on numerous studies conducted by many different groups of scientists including those who work for the US Forest Service (<https://www.elsevier.com/books/the-ecological-importance-of-mixed-severity-fires/dellasala/978-0-12-802749-3>; <http://iopscience.iop.org/article/10.1088/1748-9326/aa6b10/pdf>).

Also, contrary to occasional statements in the press, wildfires which burn in forests only consume a small portion of above ground vegetation when they burn and do not simply convert a forest ecosystem into a so-called “carbon bomb”. In fact, the large and dramatic plume that can be seen above a wildfire mostly consists of water vapor. Even in very large, intense fires, only about 11% of the forest carbon (found in soil, forest duff and fallen branches/trees, shrubs, grasses and the trees themselves) is actually consumed by the fire (and even less in most forest fires) and it is quickly replaced by vigorous post-fire forest regrowth (https://www.fs.fed.us/pnw/pubs/journals/pnw_2008_campbell001.pdf). All of the trunks of the fire-killed trees—even the very small ones--still remain in the ecosystem, storing carbon while they provide, as discussed above, some of the best wildlife habitat available in our forests. This stored carbon will slowly decay over many decades and centuries, but as it does it will contribute nutrients to the ecosystem, making it healthier and more productive. This productivity actually begins very shortly after the fire burns, as nutrient-rich ash and additional sunlight create perfect conditions for fire-following plants and naturally regenerating trees to propagate. It should also be noted once again that when a wildland fire burns in a forest, the vast majority (60-90%) of the area burns at low to moderate severity, where most or all of the mature trees are still alive after the fire, and continue to sequester carbon as they did before the fire burned. So, while fires can transform how a forest looks, these ecosystems are adapted to such disturbances and take full advantage of the changes and opportunities wildfires provide.

From a carbon sequestration standpoint, the W DFA alone--but especially if coupled with environmental rollbacks that would expedite logging—would exacerbate our climate change crisis. In

contrast, allowing fires to burn in our fire adapted ecosystems would facilitate continued high carbon sequestration and storage.

We urge you to please oppose all current versions of the WDFA, take the time to consider the current science, and fundamentally re-think our approach to this important issue.

Sincerely,

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