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Cohesive Strategy for Wildfire Management Strategy Forum, Western Forestry Leadership Coalition, May 13, 2010, Casper, Wyoming

Darrel L. Kenops-CEO/Executive Director, National Association of Forest Service Retirees remarks

National Association of Forest Service Retirees Background Introductory Comments.

Thanks for this opportunity to participate in this forum. The National Association of Forest Service Retirees (NAFSR) are most interested in this initiative. Retired U.S. Forest Service State and Private Forestry Deputy Chief Al West chairs our standing Fire Management Committee.

Al, with significant field and Line Officer experience, was in a major agency decision making role at the beginning of major revisions, improvements and updating of U.S. Forest Service Fire Management Program policy, research and operational guidance. He remains an active player in forest and fire management policy and its implementation. He is our primary representative.

The Cohesive Strategy for Wildfire Management, due to Congress by November 1, 2010, as we understand is to prepare a strategy which- **reverses the trend of large, costly, and very damaging wildfires in terms of natural resources values, property, safety (lives), and effects/impacts on watersheds, communities, people and agencies involved.**

NAFSR Board and general membership have extensive educational and operational experience with forest land and fire management policy and its implementation including incident management experience here and abroad over six decades.

We view wildfire as a powerful forest and grassland influence, like floods, windstorms, insect and disease outbreaks, hurricanes, volcano's and earthquakes, all of which we've experienced and responded to. Crises to respond to, landscapes and facilities to restore, rehabilitate.

All of these influences are part of our natural and human history/culture that have affected/impacted in a variety of ways and patterns, our Nation's landscapes and communities. We know and support the use of fire as an effective tool in carefully prescribed forest and grassland treatment regimes when appropriate fuel and weather conditions are present.

We respect efforts to date to address the unhealthy, over crowded forest situations where greater quantities of dead and dying trees are piling up. Forests need to be brought back to a healthy state.

The Intergovernmental National Fire Plan, legislative initiatives and a growing number of large costly wildfires reflects the need to get a better balance of stewardship activities to meet federal land management statutory bases and requirements, and direction in approved Forest, Grassland and designated Unit Plans.

NAFSR Response to Cohesive Strategy for Wildfire Management Forum Questions.

***What are the most critical issues that the Cohesive Strategy for Wildfire Management must address?**

1. Agency Mission confusion and drift, appeals/litigation, inadequate predictive models, coupled with diminished capacity to deliver "at scale" the needed mix of stewardship treatments e.g. thinning and forest products removal.

The federal Departments and agencies involved have significantly differing statutory bases, laws which created them and their distinctive missions.

For example, National Forests and National Grasslands may not appear on the surface to the casual observer to be different from National Parks or National Wildlife Refuges, but National Forests and National Grasslands are managed significantly different due to their key statutes which brought them into being.

So U.S. Forest Service Line Officers and staff need a good working knowledge and experience based in the Organic Act, Multiple Use Sustained Yield Act, Weeks Act (which led to creation of the eastern National Forests) and Wilderness Act which set forth the multiple values and purposes which are still relevant within a 21st Century context.

As for agency drift, mission confusion, and example--where did the idea to "continue fire management pursuit of minimizing cost and maximizing re-establishment of fire adapted ecosystems" come from?

This may be, probably is, the key factor driving everything now. And just maybe it is an achievable long term goal, within the overall statutory base. However, in thinking about how this applies, the current condition of many forests is like a very unhealthy human patient, like an overweight person with a number of related problems like diabetes etc.

A doctor might say the long term goal is for the patient to lose weight and to be in an overall healthier condition. So to get there, the patient should start eating healthier food and exercise more.

But the doctor would also, in the meantime, prescribe appropriate medications to ensure the patient does not die before the other prescribed treatments have enough time to benefit so that medications are no longer needed. And even then, healthy food and exercise need to continue.

Applying this analogy to our forests, the goal of having healthy forests that are more fire resilient, for fire "to play its natural role in ecosystem sustainability", is valid and appropriate. But it first must be achieved with the knowledge of getting there is not possible without upfront and continued intervention--in the forestry case.

We are so far below the amount of intervention needed currently that there still needs to be aggressive suppression in many areas. When we look at the data over time, why are the number of big fires is increasing when the total number of fires is fairly stable?

For the U.S. Forest Service 30 to 40 fires each year typically account for 80 percent of the costs? What are the characteristics of these fires? Why do they become big? Fuels? Weather? Resources Availability? Suppression tactics?

We think that this point, aggressive suppression, is not being stressed now, in interests of reducing costs, and it seems there is a shift towards the "fire is natural/let it burn" mentality.

In the case of forests, all associated ecosystem values are being negatively affected at a large scale, not to mention the lost opportunity for products needed for society and local economies that could benefit from providing those products. We, of course, need to ensure all is done in a fully sustainable way--the patient stays healthy for the long term, It's possible, but not if agencies continue to focus just on cutting costs and not on the bigger picture, goal of achieving fully sustainable forest management (ecologically, economically, and socially sustainable).

We know the ill human analogy doesn't fit perfectly for forests. But it's close enough to make the point that forest management can't just shift to hands-off management and hope for the best. And that is close to what is happening in some cases. If that continues and fires keep getting larger and more impactful, the public, in the case of National Forests, are going to look for a "new Doctor".

Another example comes from the 2009 Quadrennial Fire Review report where it states--"At the center of Fire Management is the penultimate objective of allowing fire to play its natural role in ecosystem sustainability". This statement ignores the fact that our 300 million, projected end of the century 400

million citizens, many in and adjacent to these public lands are dependent on water and other natural resources from National Forests and National Grasslands.

The report language reflects the view of fire burning gently through the woods doing no harm. It ignores the fact the large, dangerous, stand replacing fires are part of nature and that their consequences are intolerable to society.

There are significant differences in and between individual National Forests. Some are in rural settings while some lie adjacent to and are cornerstones for large urban population centers. And a critical factor is where many homes are built on private property within a National Forest boundary and contiguous to large population centers.

How can one sustain the point of view that increased use of Wildland Fire Use is acceptable when it is noted that smoke from prescribed fires has reached its peak of public accountability? Smoke is smoke! What is the difference from a discretionary decision to start a prescribed fire and a discretionary decision to let a fire, which could be suppressed, burn?

How do these statements, thinking relate to the agencies statutory missions? Align with approved Land Management Plans? Align with Clean Air and Clean Water Act? How about alignment with Threatened and Endangered Species Act requirements? What about increased focus and concern on greenhouse gas emissions?

Southern California's chaparral is the best example of a fire adapted ecosystem in the National Forest System and it generates the highest cost of protection in the Nation.

We've seen examples where a local forest attempted to change an approved Forest Plan thru an National Environmental Policy Act Categorical Exclusion (CE) to bring forth a wide ranging fire management strategy, when fire is one of the most impact rendering influences to watersheds, wildlife, fisheries, in place forest investments and facilities.

A fire management strategy which can have significant negative immediate and cumulative effects on maintaining forest and grassland productivity, which is one of the U.S. Forest Service's statutory bottom lines.

The increasing limited wildfire and natural resources knowledge and experience by key Agency Administrators hinder their effectiveness in providing direction to wildfire Incident Commanders (IC) so they understand the consequences of their IC decisions.

Add in restrictive federal, state, local and private budgets and investment opportunities due to the economic slowdown, compounded by appeals and litigation preventing reasonable forest treatments to improve forest resiliency. And community protection situations, a dwindling manufacturing infrastructure. All of these factors in combination results in agencies falling further and further behind the treatment curve.

The reason the U.S. Forest Service fights fires is to protect National Forest and National Grassland natural resources, watershed values, and communities and to be a good responsible neighbor so as to not also impact private and public landowners adjacent to or within National Forest, National Grassland boundaries. And to assist local and State fire fighting agencies within U.S. Forest Service statutes, cooperative agreements and compacts.

But in the 2009 Quadrennial Fire Review report draft the RAVAR predictive model presented does not make sense when watershed values, timber values, wildfire habitat, fisheries habitat and recreational values are considered second tier values. It also was not clear how fire severity as affected by long term drought factors into the use of this model.

There needs to be clear understanding, clarity, recognition and respect for the differing statutory purposes of federal management systems. As well as the differing objectives, purposes for areas within these systems. e.g. designated National Forest Wilderness Preservation Units, general forest non-Wilderness designated areas, and forest, grassland watersheds on the landscape. As well as recognition of differences

in fire fuel types e.g. forests, grasslands, brush/woodlands landscapes.

This indicates a pressing need for better planning, such as evaluating fuel loadings and expected fire behaviors in specific to insure appropriate management responses, decisions which do not lead to resource damage. Wildfire decisions support systems include or need to include significant impact information not to be taken lightly. Understand this basic!

In closing to achieve healthy and resilient ecosystems, there needs to be **purposeful management**. Active management in some places, passive management in others, but purposeful in either case.

2. Inadequate, sustained, upfront, proactive cooperative and healthy working relationships with State and most importantly local governments, affected communities, businesses and citizens.

Recent wildfire incidents have brought forth federal agencies differing capacity, interest or skill to sustain authentic, productive working relationships with local governments and communities, including fire cooperators. This deterioration is caused by a series of factors and needs to be examined if any Cohesive Strategy for Wildfire Management is to be implemented, have positive on the ground and achieve results.

We believe this is a primary driver, including costs and impacts to natural resources and watersheds, for elected officials to call for a Cohesive Strategy for Wildfire Management that can work. For an affected citizen or business owner perspective their concerns range from the negative health impacts to they and their families and shut down business activity when large fires rage across the landscapes in their neighborhood. These are the folks who feel wildfires immediate impacts as well as the aftermath of cumulative short and long lasting effects.

With tighter governmental budgets, the search for a better combination of forest investment strategies which add value rather than continually call for greater amounts of emergency, supplemental funding from stressed taxpayers has become paramount. The pockets are only so deep and getting shallower. If this issue is not dealt with effectively expect a major re-ordering of fire management functions out of federal land and resource managing agencies to some entity who will maintain better working relationships and will be within tighter fiduciary guidance.

At a recent Andrus Center conference a respected local, experienced leader stated that he is working with some 50 local governments in the West whom feel federal land management agencies are not effectively working with local county governments.

There is no reason, nor rationale that federal land and fire managers at any level should not be close working partners whose land management and fire management plans are transparent and understood in detail so when the fire emergency arrives there are no surprises because in pre and in season meetings, discussions are held, and issues hashed out and problems solved.

3. Inadequate performance, monitoring measures, total cost/benefit, "whole brain" thinking to benchmark impacts, assessment of options, document and display progress and shifts needed in strategy.

We recommend you review and discuss in depth two reports which capture the "total cost" of wildfire as well as portray sustainable options for treating forest conditions to get to resilience. One is the recent 2010 Western Forestry Leadership Coalition's "True Cost of Wildfire" publication.

The other report was prepared by the University of Washington for the State of Washington legislature to see how to get better forest conditions while also adding value and using forest products and biomass to help lessen our Nation's energy crisis. It uses "life cycle analysis" which by the way Sweden uses to benchmark progress in meeting their sustainability goals.

A major pressing need is to bring forth a better, more complete, sustainable monitoring measures that document fire management strategy impacts to soils, water and watersheds, especially large costly fires. Included should be reliable data and wildfire greenhouse gas emissions for public health and climate concerns now seen as top national priorities.

Local National Forest and National Grassland watersheds are the best local landscape scales to begin with to address on site and off site, upstream and downstream effects to determine if you achieved objectives. It is also a prerequisite to monitoring Forest Plan activities to achieve desired future conditions.

Again we need better planning (such as evaluating fuel loadings and expected fire behaviors in specific watersheds) to insure appropriate management response decisions do not lead to natural resources damage. Currently we do not see rigorous follow up monitoring occurring and we understand that tight federal budgets do not include such as a priority to be fully funded.

***What questions should the Cohesive Strategy consider to identify priority values, attributes and other concerns?**

In our comments to the first question about issues , you can see the elements where such definitions can be found e.g. in local approved Forest Plans, so it becomes a question if decision makers are aligned with the plans expectations, priorities and rankings. So any such exercise needs to be built from the ground up, because it is in those local watersheds and compartments where you begin the sorting process of what is most important.

***What should the Cohesive Strategy consider in order to rate and incorporate risk? (Definitions, Weights, Ranking/Priorities?)**

In terms of "risk management" we just sent in our NAFSR advice and comments on proposed National Forest Management Act, Forest Plan Regulation revision where a like questions was asked of us. Our NFMA comments in full can be accessed at www.fsx.org or just type--Forest Service Retirees--in your search bar.

So risk, lets begin with scientific uncertainty. The presence of risk and uncertainty does not mean that a definite management decision cannot be made, but it emphasizes the agency's need to see things in terms of probability and risk assessment. Uncertainty is a neutral analytical property of an event, relationship, phenomenon, or other important consideration that may be reduced through better science or other important consideration. This likelihood of occurrence may be unknown, or may have a distribution of possible values, **but it is not under immediate control, in our example, of U.S. Forest Service decision makers.**

There are three broad categories of uncertainty in a decision context: scientific, administrative (or implementation),and stochastic.

Forests are complex systems and our knowledge of them is incomplete. As a result no one can state with certainty the long-term outcomes of any given management strategy, including maintaining the status quo. Scientific uncertainty is often expressed as a calculated or estimated confidence interval around a predictive value or outcome.

Administrative or implementation uncertainty refers to the vagaries of managing in a political environment in which public goals and priorities, societal needs and conditions, and organizational capacities change over time. Finally stochastic uncertainty refers to those events that are largely random, unpredictable and uncontrollable, such as lightning caused ignitions or random changes in species populations. So where does this lead us? To be effective all participants need to understand where scientists agree, disagree and where their relative certainty ends.

Defining risk is fundamentally an expression of the values of those framing the decision problem. **Risk has three components; e.g. hazard-an area's fuel loading and dryness condition; risk or exposure-the probability of ignition; and value e.g. the physical, social and economic costs of the potential damage.**

How people perceive risk depends on ***what they value; *how the risk is framed; *their levels of trust in the responsible organization or institution.** The problem of generating a single unbiased summary of risk information to meet the needs of participants in a risk decision is not a purely technical solution.

And the level of trust is a by product of the decision process (Shindler and Toman, 2003). We suggest reviewing Covello and Allen's work *including Seven Cardinal Rules of Risk Communication*, (Covello, McCallum, and Pavova, 1987)

We have seen where in an early July fire season, decisions were made to not suppress, only to see the specific fire breakout of desired boundaries to affect other forest resources negatively and in some cases burn into local adjacent communities. This is a very costly example of risk taking and decision making.

Some very experienced fire managers know about risk, probabilities, but the experience base in federal natural resource agencies is dwindling in this regard. It takes years of experience in the field across the natural resources spectrum, plus a healthy dose of fighting fires where you develop a keen sense of the risk. the power, impacts of wildfire.

***What time frame should the Cohesive Strategy encompass? Why?**

Our sense is once threshold conditions, goals being sought are established to rebalance the threat and risk to a less costly one in terms of natural resources and watershed as well fiduciary impacts will determine what is workable.

The National Fire Plan, we believe, was designed in terms of a 10 year timeframe. This brings up the point that evaluation timelines for this strategy need to be integrated agency frameworks based on their performance reporting and statutory responsibilities.

***What questions should the Cohesive Strategy include to inform and be informed by existing land units plans? Intergovernmental compacts, CWPP's, and Fire adaptive communities, and State risk assessments, and local land management ordinances and regulations?**

Realizing the division of responsibility between local, State and National government, such is a sensitive question to be settled primarily on a local and State, not National level. Avoid getting into the one size fits all approach when addressing this question.

Local federal natural resource line officers, in the case of the U.S. Forest Service, District Rangers and Forest Supervisors, local county governments are the prime logical integration points. The next logical integration point is the State Forester Assessment Plans, as it pertains to the U.S. Forest Service cooperative and key partnership relationships.

Other involved federal agencies have their local counterparts and working relationships which may differ.

***All things considered--what is the single most significant issue that the Cohesive Strategy must address?**

Find a framework, design incentives and access sufficient resources to help field managers, cooperators and communities to treat enough acres on the vast, diverse landscapes of our Nation to adequately reduce the effects of wildfires.

This does not mean treating all acres, but enough acres in the correct places, correct patterns, and correct prescriptions to be both effective and sustainable.

Adequate industry and agency infrastructure is a very essential requirement to assure such progress and chance to succeed. Increased local coalitions will help solve this huge puzzle by building community, social and business connections/networks that will cause practical, value added work to be done.

It will be essential that federal natural resource, land managing agencies fully participate with sustainable forest work to match the treatment needs and need to sustain community and manufacturing infrastructure.