

SUMMARY OF PUBLIC COMMENT RECEIVED
by the
Fire Suppression Interim Committee
January-February, 2008

*** Please note: The comments below are intended to summarize and categorize the large amount of written public comment the Fire Suppression Committee received during its public comment solicitation in January. They are not intended to be all-inclusive, nor are they intended to be entirely verbatim; in some cases, edits were made in the interest of brevity or for the purposes of clarification.*

HOMEOWNER RESPONSIBILITY

- ▶ The homeowner must prepare for fire each year. The homeowner must take the responsibility to prepare for fire.
- ▶ The local volunteer fire departments, communities, state and federal agencies and local governments must educate and remind homeowners each year to prepare for fires. It should become instinctive to all homeowners to prepare for fires.
- ▶ Homeowners need to know what their chances of fire protection are from local, state and federal agencies. Homeowners should realize that under large fires, local resources will be overwhelmed and that from federal agencies with limited funds and resources, the chances of protection in large fires is slim at best.
- ▶ We expect insurance companies, locals and state and federal beginning immediately in April to notify the public about their responsibility to their own homes as well as the chances of success on fighting fires around their homes regardless of whether the homes are prepared for fires.
- ▶ Fire proofing homes is far easier than fire proofing the forest. Mandatory metal roofs, removal of fuels near homes and perhaps surgical thinning immediately adjacent to homes are the best way to deal with wildfire.
- ▶ The legislature should pass a law mandating basic requirements of homes for fire protection.
- ▶ Local governments should require certain fireproofing of all new homes and restrictions of fire proofing within all new subdivisions.
- ▶ Local governments must educate forest users and rural property owners on how to address slash and debris removal and encourage the public to participate.
- ▶ It is not the job of firefighters to reduce fuels around structures that are in the path of a

wildfire. Taxpayers should not pay for preparing someone's property for an oncoming wildfire.

- ▶ The legislature or local counties should designate wildland hazard areas throughout our counties. We can create special taxing areas, special impact fees or other fees for those who insist on building in hazardous urban wildland interface areas. We can urge planning boards to look seriously at proposed subdivisions and educate private homebuilders who insist on building in fire risk areas.
- ▶ The homeowner who builds in the interface or near forests should not have to pay any increased taxes, fees or impact fees unless it is clear that the fees and taxes can be shown will be used to protect that person's home. If it is not, then why pay for a tax increase when it is clear that the home will not be protected. It must be clear that any fee or tax will be used and how used to protect a home.
- ▶ There is the argument that if you move to the woods the local communities and government say you moved up there it's your problem. But if you are also paying taxes for fire protection then you should expect something in return.
- ▶ All agencies, local communities, fire fighting groups, dept of state lands, etc. should remind people to prepare for fire season each spring and during the summer and also remind them in the fall. "Pray for rain, but prepare for fire" should be the motto. Who to contact, how to prepare for fires, what to expect in fire season from small to large fires and the chance of being helped during fire seasons to your home and property.
- ▶ Developments and homes should return some form of money each year in taxes and fees for fire protection.
- ▶ Many pay taxes to the county for county fire protection not DNRC but some have never seen a county fire engine respond to our area. Some locals just are not capable of fighting fires for homes or even fires on land.
- ▶ Encroachment of homes in fire prone areas is an increasing problem and is costing the average taxpayer too much. These homes should be taxed according to danger levels of location. If it taxes them out of having a home there so be it. Not fair to normal taxpayer to protect home.
- ▶ With a good deal of the state's growth occurring in the wildland-urban interface, polices that restrict, or at least require some level of minimum standard for, development in wildfire hazard areas have the potential too minimize the increasing wildfire vulnerabilities in the state.
- ▶ Homeowners must be aware and plan and provide for the importance of an access road that allows both access to the site for fire and emergency vehicles and that will provide

an escape route for inhabitants. Many homes and subdivisions in the WUI are being located in very hazardous locations. Locations such as in draws or steep slopes where the risk to the homeowner and firefighter is extreme. A possible solution would be to just not allow development in these areas.

- ▶ Landowners who have reduced their fire hazard should be exempt from expenses and liabilities occurred from fire suppression. Consider enactment of the Oregon Forestland-Urban Interface Fire Protection Act or something similar.
- ▶ City dwellers of incorporated cities should not have to pay for fire fighting services outside of city limits. We are subsidizing those outside of city limits with our own tax dollars.
- ▶ We still have an extremely hazardous condition with existing homes that are not "firewise", plus the many more that are being constructed in the WUI. Recommend an increase in funding for educational efforts and grants that create defensible space. Encourage insurance companies to carefully consider existing fire conditions before insuring. A harder line position would be to deny insurance through state law for those properties that are a fire risk to themselves and their neighbors.
- ▶ Building codes vary for residences outside of municipalities. Many materials are recognized as being fire resistant while others are not. Recommend building codes that promote fire resistant materials. Either the State sets them or the locals set them but they need to be done.
- ▶ The definition of WUI means much to many people. The wildland urban interface consists of high density housing, low density housing and dispersed housing that is adjacent to fuel conditions that can burn with high intensity during wildfire season. Low density and dispersed density housing applies to many family forestland owners which across the nation is defined as ownership of at least 10 forested acres and the possession of a written and certified forest management plan. We need a good definition of what it means.
- ▶ There needs to a list each year for each home whether it is safe or not to help with fire protection.
- ▶ The current trend is to blame the skyrocketing cost of fire suppression on residential construction in the wildland urban interface. We are confusing cause and effect when we look at suppression costs in that way. Without a doubt, large sums of money are spent on protecting life and property in the WUI. But the primary risk from those catastrophic wildfires lies outside of the WUI on our public lands. The deplorable condition of our public land resources and the astronomical fire danger that exists there is the real problem. Landowners in the WUI have a definite responsibility to treat their property to minimize wildfire risk and maximize survivability of their property in the event of a fire.

If homes were not in the WUI, private timberlands and ranch lands would be. Those lands also have significant a value that deserves protection every bit as much as a residence. No matter what, there will always be an interface between public and private lands. While the managers of our public lands may be willing to allow our public resource to be destroyed and wasted, no private landowner would be or can be so negligent. We need to re focus our efforts on minimizing the risk of catastrophic wildfires starting on public lands and then burning into the interface with private lands whether there are homes there or not.

- ▶ Wrapping expensive houses is a terrible PR job. Homeowners should be responsible for their own home protection.
- ▶ Those who elected to have a house in the forest/rural or forest/urban interface should pay special government taxes that are reserved for fire fighting activities.
- ▶ Central questions for government on structures
 - How much does the public pay to protect private structures in the public firefighting efforts?
 - Issue- are we paying for them to protect against the public land fires?
 - How do demands for funds, human resources, equipment, and firefighter training differ for structure protection?
 - What are the current trends in costs for structure protection?
 - What are the projected changes in the number of structures vulnerable to wildland fire?
 - Who should be responsible for defending structures?
 - Who should pay the costs of structure protection?
 - Does use of the state's general fund to pay structure protection costs reflect tax accountability in the state budget?
 - What policies and tax structures have other states and public entities developed to address structure protection and accountability in budget and taxation?
- ▶ Humans have caused many fires to ignite near the wildland urban interface. Those people must be punished if caught. Also people need to be made aware of the statistics of man caused fires and they are just as dangerous and need to be prepared for.
- ▶ Have a qualified fire inspector tour your home and follow their recommendations. Attend fire training and support your fire departments, be aware of your county government polices and concentrate on what role your disaster and emergency services is playing in this and if your county DES officer is qualified to make the required decisions.
- ▶ Currently I am double taxed for fire suppression. We have the state fire protection, based on acreage and at the same time a mill levy on entire property evaluation goes to the local fire department.

- ▶ If the state simply does more rules, regulations, etc. on wildland interface with the feds doing less, there are not the resources at state disposal to do more. If the state spends more, the problem still is dealing with a landowner that we have little or no control over how they fight fires.
- ▶ Pass legislation that requires all people who reside within or bordering forest or rangelands that are fire prone to form and/or to belong to rural fire districts. Rural fire districts must be granted the authority and responsibility to require residents or other property owners within the district to (1) adhere to county building codes and maintenance requirements that are designed to reduce the risk from forest fire generated burning embers. (2) Through fire assessments on their property, fire district residents must pay the full cost of fire prevention, pre-suppression (engines, fire crews, etc) and fire suppression.
- ▶ The alternative to the suggestion above is if we pay the taxes will you defend our homes.
- ▶ Subdivisions are being approved without adequate consideration for wildfire risk including water supply and ingress and egress. Require Firewise assessment of the proposed subdivision at the time of the application and make the recommendation from the assessment a requirement for approval. Lincoln County currently doing this.
- ▶ Need to have fixed the fire protection fee since condos should probably be paying more and to fix an easier way to have the existing fee allocated without having the DNRC staff redo the land descriptions from Dept. of Revenue records to allocate the fee.

OTHER LANDOWNERS

- ▶ The private landowner needs to be informed at the early stages of the fire as to what is expected of them as to paying for any of the resources used by the fire agencies, particular private resources. If the private landowner is expected to pay for any of the resources, they should be involved in the management of the fire.
- ▶ Saving grass can be done, but it takes fire engines to do it. Most crews are focused on controlling the perimeter, and don't commit resources to mopping up fire within the interior. This usually results in bitter complaints from the owners of the grass. The legislature can help in establishing some expectations for teams to manage big fires on private lands and can provide the liaisons to talk with ranchers about what can be realistically accomplished.
- ▶ Ranchers and farmers must be informed by both local, state and feds every year what the capacity of fighting fires are and what is expected if a major or minor fire occurs. Landowners need to understand years ahead of what can or cannot be done in fires. There are too many mixed messages by fire management on what can be done on fires. Landowners may have understandings of what fire fighting is and can be done.

Landowners also need to be educated as to what can be done to protect their resources.

- ▶ Landowners need to take care of their own forested lands. Work with timber companies, land trusts, etc. If the feds are being asked to take care of their lands, privates should do the same.
- ▶ There needs a decision from federal agencies if landowner's grass and cows have any value to be protected.
- ▶ As a REIT [real estate investment trust], Plum Creek pays no corporate income taxes to our state. As these lands become developed, our WUI problems increase dramatically. The problem of more fires in these WUI owned by Plum Creek will be exacerbated greatly as Plum Creek continues to sell timberlands for real estate. It just does not make sense to me that Plum Creek makes money selling the land to developers, developers make money creating subdivisions, and the taxpayers are left holding the bag when a fire threatens the newly formed development.
- ▶ The local and state governments should restrict development in the Plum Creek Lands to place subdivisions in defensible positions, to have taxes and fees from the subdivisions and Plum Creek to pay for fire protection even on a limited basis.
- ▶ The federal government should buy most of the Plum Creek lands and keep development out.
- ▶ Plum Creek's comments:
 - We would support some type of equitable tax surcharge or user fee linked to structures located in the WUI. The revenue would help fund the added costs of fire suppression associated with existing dwellings threatened by wildfire.
 - We would like FSC to explore a Firewise certification program for new developments in the WUI. Perhaps a set of standards could be developed related to desired construction materials, subdivision design, covenants, and vegetation treatments to provide mitigated development in the WUI. Particular developments or properties adhering to the standards or guidelines could be Firewise Certified by DNRC or another agency charged with wildfire suppression duties.
 - We support the concept of active fire management on private, state, and federal lands to reduce fuel loading in the forests. Fire suppression efforts on managed forests may be more "manageable", less destructive and prone less to rapid expansion than forests with high fuel loading.
- ▶ The committee should set up a working group or subcommittee to work with Plum Creek and other local governments and agencies to come up with specific recommendations concerning Plum Creek's comments.

- ▶ Plum Creek sells the land, the developer builds the houses, the buyers move in and the public at the Forest Service bails them out. That has to change. We cannot afford to keep writing the blank check.

FEDERAL POLICIES AND FIRE FIGHTING

- ▶ The Forest Service can't and won't fight fires to protect property that is not either a home or a structure.
- ▶ If a fire is attacked in the first 10-20 hours, the success rate in containing the fire is around 97%. The crews that are used to do this are termed "I-A initial attack crews" and they are extremely efficient and well trained. Aerial fire suppression is also a very effective tool at this time. Unfortunately only 1 ½% of the aircraft that are thought to be available at any one time is operational.

There are various reasons and opinions why the fires are uncontrollable from this point on. One prevalent opinion is that fires have in the past, until twenty five years ago been put out early, thus increasing the amount of fuel left in the forest. This was the thinking that led to the let it burn policy that has been in effect since then. This has proven to be not quite valid assumption as some of the Montana and Idaho fires, during the past two years, have been over areas that were burned in the previous 20 years. The reality is that the extended drought and heat of the last few years has dried out the re growth brush and grass that has grown back after the initial fires. This has become a dangerous source of potential fuel in itself in these dry years.

The above items notwithstanding, there are several more reasons that fires are not being controlled after the initial attack phase. The next type of classification for fire control and suppression is called "the extended attack phase". Over the past twenty years or so, in an effort to control costs, the Forest Service has steadily reduced the numbers of in house full time fire fighters and supervisors. They now rely on outside fire crews and fire trucks, both structural and wild fire types. Supervisors are recruited from among former Forest Service employees with previous fire fighting experience. Crews that are hired to fight fires do have to be certified by the Forest Service. That is where a problem arises; some of the crews are well qualified and well supervised, while others are not. There are some independent crews are in large part more of a danger to themselves and those around them, than they are useful in the actual control of wild fires. The structural crews would appear to be somewhat more competent; it was indicated by people with extensive fire management experience, that they would be comfortable with at the most 65% of the trucks and their crews that are supplied to them. It is also interesting to note, that by far, the largest amount of funds expended on fire suppression in the wild fire arena are spent on these extended attack resources. There is also a big shortage of qualified supervisor personnel available. Many fire trucks are hardly ever utilized but they are apparently there just in case.

The shortage of experienced supervisors is due to several factors. The first is that at the time that the Forest Service reduced the number of full time fire fighters a like reduction in supervisors was made. For many years these people were then available for hire as private contractors during the fire season. However, as will all people these people grew older and no longer wanted to do this type of work. Another factor that comes into play is the liability factor. If something goes wrong in a fire operation, the blame can be shifted onto the supervisors and away from the Forest Service. Contract employees do not have the immunity from prosecution enjoyed by government agencies; supervisors have been held liable for both loss of life and loss of property and thus many qualified people do not want to assume the risk. The Forest Service has also responded to these situations in their own way. People were lost fighting fires in areas where there was fuel for the fire so crews were no longer used to build fire lines in areas where there is fire fuel except for back burning. Wild fires lay quite dormant during the night and early mornings due to lower temperatures and higher humidity and this is the ideal time to try to control them. However, there have been people killed and injured fighting fires at night so this is not now an allowable option.

- ▶ If fires are not controlled at the very beginning, then they are impossible to manage due to the present fuel conditions in our wildlands and the worker safety restrictions now in place.
- ▶ The money spent on the extended attack plan to protect private property other than structures is a complete waste.
- ▶ The bulk of the resources available on a particular fire are used to protect structures and homes or cabins. No attempts are made to contain the fire to Forest Service lands. Indeed private property is sacrificed to control the fire and free up resources for structure protection. There is no insurance to protect grass, trees, or wildlife habitat, fences and water tanks.
- ▶ Fire retardant drops while spectacular are almost useless and are nothing more than public relation displays unless used in the initial attack phase. The funds and resources spent during this phase would be better spent on such endeavors as thinning, fuel control projects, and compensation to adjacent landowners for damage due to unchecked fires.
- ▶ Landowners who border public lands can be held responsible for fire fighting costs arising from fires that are allowed to spread onto publicly owned lands from private holdings. There is no reverse liability here. The Forest Service is not liable for damage caused to private property from fires originating on public ground, whether or not any measures to control the fire were used.
- ▶ Another point to be made is that the level of priority that wildfires have varies from national forest to national forest. It would seem that the farther one is removed from southern California, the lower the priority that is given to fire prevention and control.

- ▶ The people of Montana are not getting much bang for their buck when an interagency fire agreement with the federal government is signed.
- ▶ What needs to be done now is fuels reduction projects, road improvements, restructure policy to stop wasted fire resources. Appoint affable personnel who want to be there and teach them to leave the attitude at home. Offer incentives to landowners to be firewise- i.e. fuels reductions, construction to prevent fire spread, develop water sources, irrigation systems surround buildings, etc.
- ▶ Federal agencies need to recognize the importance of coordinated pre planning. This has a high priority especially in counties like Beaverhead.
- ▶ Include local volunteer fire chiefs and assistant chiefs on type 1 and type II management teams.
- ▶ To ensure involvement by local rural fire departments, improve and increase training workshops for those individuals.
- ▶ On type 1 and type II fires, rely more heavily on local fire departments. Currently the emphasis is on using contract crews.
- ▶ Closure implementation should occur earlier than it does now. Areas known to contain elevated levels of fuels should be closed before they are on fire.
- ▶ Individuals who permit camping or other activities to cause fires should be held responsible and subjected to large fines. The present policy is supposed to do this but seems to be poorly enforced.
- ▶ Initial attack is essential to successful fire suppression. Cooperation between agencies, private contractors and local fire departments must focus on successful initial attack. Preparedness and severity funding to have initial attack resources available and ready is the best money spent in a fire season. This includes having cooperative agreements and communication with private contractors who have equipment suitable for fire fighting and are working in fire prone areas that could be quickly mobilized for initial attack if a fire were to start.
- ▶ Effective and efficient use of heavy equipment is vital to successful and quick suppression of wildfires, especially in the fuel conditions and fire behaviors we have been seeing recently. Safety constraints on hand crews coupled with the severity of the fire activity limit their effectiveness in containment activities.
- ▶ Develop training and certification programs for private contractors to not only serve as equipment operators, but also to be line officers for fire suppression activities.

Unfortunately, both state and federal agencies are quickly losing institutional knowledge in on the ground fire suppression tactics. Furthermore the trend is to put the least experienced fire fighters in these on the ground positions where the decisions are made that dictate success or failure in suppression. Dozer bosses are a good example. Why not create opportunities to train and certify private foresters, logging contractors and others who work with equipment and forestland on a year-round basis to perform these leadership and supervisory jobs as well?

- ▶ We need to develop private contractor heavy equipment suppression squads that have not only the equipment and operators but also the leadership, supervisor and support roles such as dozer bosses, support crews such as lowboys and fuel service as well as qualified line officers to cooperate with the fire operations specialist. Rather than requesting individual pieces of equipment like we do now, you could request a mechanical fire line squad that would have a feller buncher, skidder, dozer, lowboys, dozer bosses and other supervisory personnel all as one unit. These units could train together and be deployed together as a unit. This will greatly increase the efficiency and effectiveness of heavy equipment on fires.
- ▶ We need to keep the fire fighting professionals who are familiar with Montana fuel types, topography, fire behavior, suppression tactics and other local issues in Montana. Almost all of our successful suppression of large fires comes when the out of state teams consult with and cooperate with the local knowledge and resources. I understand the need to cooperate with other states and agencies on "fire teams" and fully believe that many aspects of the fire team can be mobile across the country. However, like the heavy equipment suppression squad idea, we need to consider splitting how our "fire teams" are organized. On the ground suppression operations need to be led by local resources. Operations chiefs, division supervisors, equipment supervisors, fire behavior specialists, etc. need to be separated from the "overhead" such as logistics, mapping, safety, etc. Formation of floating "overhead teams" that couple up with local "suppression teams" on large fires may improve the success of large fire suppression activities.
- ▶ We need to continue to provide both technical and financial assistance to private landowners to assist them to treat fuels around their property and homes. The goal would be a structure that could survive a wildfire without significant human intervention. At the same time, landowners need to understand and accept the risk of losing their home and property if they do not take personal responsibility for its protection. Building cooperatives with existing outreach organizations such as the Montana Tree Farm System, Montana Forest Stewardship Program, DNRC Forestry, and local fire departments would be the most efficient manner to distribute technical and financial aid.
- ▶ The issue of fire suppression is almost too large to get one's hands around. As the old saying goes, an ounce of prevention is worth a pound of cure. The state DNRC for its aggressive initial attack, early detection and overall cooperative outlook to fire suppression is good. I think if we could get similar attitudes in all agencies with fire

suppression responsibility and remove what could be viewed as incentives to have large project type fires, we can go a long way towards reducing the negative impact of this fire dependent ecosystem.

- ▶ The federal fire agencies need measurable performance measures as to fire fighting policy, fire fighting, etc. that the public can follow not only as to the fire fighting over a season but each major fire also.
- ▶ Future agreements similar to the Beaverhead-Deerlodge conservation restoration and stewardship act should take into consideration major fires as well as protection of watersheds during droughts as well as restoration after fires.
- ▶ Cost sharing agreements must be reviewed by the legislature as AMR takes effect to decide how costs should be borne between the state and federal fire agencies.

FEDERAL AGENCIES

- ▶ Federal management to fighting large fires or even initial attack on fires is sending mixed signals to everyone including themselves. This is dangerous to firefighters and home and landowners. The federal management needs to be clear of their capacity to fight fires and how they fight fires to the public and other firefighters including their own. The longer the federal government management sends these mixed signals the greater the chance for firefighters dying and large number of homes burning including towns and communities.
- ▶ There is little way in how federal agencies define what values are important to protect or have even asked the public what are important values to protect especially on private and public lands once the fires have left the federal lands.
- ▶ Federal firefighting management needs to have surveys or reviews by the public where fires occur to get feedback on how the public perceives the fires were fought. There is little or no request for feedback from the areas where fires were fought except from fellow firefighters.

STATE ISSUES WITH THE FEDS

- ▶ In 2007 federal agencies began widespread implementation of appropriate management Response (AMR) for all unplanned wildfire ignitions. The DNRC has several concerns as also shared by local government partners that can be categorized into the following areas of emphasis:
 - AMR in current fire climate, drought, fuel loading, fire behavior. Should any agency be contemplating something other than full suppression given these outlooks? Valid reasons for modified suppression are negated by the potential for fires to spread beyond their intended ecological boundaries in many cases.

- ▶ AMR implications for fires in or threatening the WUI and federal divesting of interface suppression responsibilities. The Montana DNRC functions as much like a fire department as a wildland fire agency, and that mission includes protection of private property and critical infrastructure threatened by wildfires. Conversely, the federal agencies are wildland agencies, and there is constant discussion about the appropriateness of federal agencies fighting fires in the interface. However, it is important to note that there is significant federal acreage defined as WUI by communities and counties across the state. Therefore, discussion about federal divestiture of structure protection and or interface suppression must include a plan to mitigate the fuel hazard and fire risk on federal holdings within the interface. Only then will it be reasonable to ask state and local government to assume more of the interface fire suppression role.

- ▶ Adequate explanation of AMR and collaborative decision making between land managers, IMTs, local responders, elected officials, and the public. There remains much confusion among nearly every audience with regard to defining AMR and its implementation. Though not new, the approach to AMR, is different from the way state and local governments have historically approached wildland fire suppression. In the absence of full suppression, the public perception is that the government is unwilling to take the necessary steps to protect their homes and property.

- ▶ Economic and public health impacts from large, long duration fires. The most frequent complaint received from the public during the 2007 fire season was about smoke. While little can be done about it, the fact remains that large, long duration fires damage the state's air quality and pose a significant health risk to the elderly and those with respiratory illnesses. Long duration fires also impact local economies negatively because people with health problems that are aggravated by smoke will not visit areas near large fires. There were frequently inquiries about air quality from non-residents who were planning trips to Montana, and the majority of them changed their plans out of concerns related to air quality.

- ▶ Communication of intent by federal agencies during development of any and all AMR strategies. While federal agencies to a commendable job of explaining the resource benefits of modified suppression, they do not clearly communicate their intent regarding protection of private property. Many view 'point protection' as a contingency plan for saving homes from a fire that should have been aggressively fought when it was still many miles away. A near constant criticism of federal agencies is that they are not aggressive enough on initial attack and that many large fires could have been suppressed when they were smaller.

- ▶ Conflicting fire management mandates among federal, state and local agencies. The Montana DNRC is a fire suppression organization with a full suppression mandate. While there are circumstances when another strategy is appropriate, the basis for those decisions is the statement that full suppression is always the first consideration. AMR seems to be the opposite: it appears that full suppression is treated as a last resort to be undertaken

only if less aggressive, cheaper options fail. The clash of these two ideologies creates tension among federal, state and local partners.

- ▶ Impacts of long duration fires on state and local resources. The DNRC and its local partners are organized for aggressive initial attack. We believe that the safest, least expensive fire is the one that's prevented or the one that's aggressively suppressed as the smallest size possible. Once a fire escapes initial attack, management decisions are made for extended attack, which include releasing IA resources as soon as possible. The main reasons for that is to keep them ready to respond effectively to new fire starts. Long duration fires tie up local resources as well as DNRC staff to the extent that the IA mission is compromised. Even a supporting role on an incident- as an agency representative, local government contact, or liaison-requires significant time and commitment of resources. Over time this depletes firefighting resources and lessens our ability to respond to new fires.
- ▶ Compensation for losses resulting from point protection WFU, or other less than full suppression actions. While it is difficult to quantify in some instances, there is a financial impact to communities and private landowners resulting from AMR policies. Even without losses of structures; there are losses such as grazing lands, tourism, recreation, and other infrastructure i.e. fences, that must be considered. Should the federal government pay for 100% of the economic recovery as a result of fires they do not actively suppress?
- ▶ With continued pressures to lower fire suppression costs and address safety concerns, it is reasonable to expect AMR policies to be in place for the foreseeable future. There are, however, recommendations for mitigating some of the problems with AMR implementation. Specifically:
 - Federal agencies need to better explain the concept of AMR to the public, other wildland fire agencies, elected officials, and other stakeholders. The time to do this is before the incident; clear communication of the policy prior to the process of implementing it is key to gaining understanding.
 - Agencies must involve all potential jurisdictions for any incident. Each must have the opportunity to voice their concerns/opposition throughout the AMR decision-making process.
 - Policies regarding fire in the wildland urban interface cannot be developed without a comprehensive effort to reduce the fuel hazards. Agencies must further clarify structure protection guidelines for fire in the interface. State, local and private entities must also recognize and take responsibility for their roles in WUI issues.
 - Agencies must be transparent in communicating their intent regarding all wildfire incidents. If, from the start, there is no intention of suppressing a fire, all

cooperators, stakeholders, and the public need to know.

- If an agency representative, local fire chief, or other cooperator disagrees with the AMR strategy and subsequent wildland fire situation analysis (WFSA), they must inform the host agency in writing.
 - If a suppression strategy includes purposely utilizing private lands for fuel breaks or as tactical opportunities, private landowner must be well informed and as appropriate, be compensated for losses.
- ▶ The state needs to have initial mutual attack on all fires regardless of federal or state lands (The issue with Tribal lands has to be negotiated with tribes.) unless federal agencies have said early on to not fight the fire. Early on means weeks ahead.
 - ▶ A lesson learned in our multi-jurisdictional partnerships in managing the 2007 Chippy Creek, Blackcat, and Jocko Lakes fires is that the USFS, Confederated Salish and Kootenai Tribes, and the state of Montana are not on the same page in regards to AMR, long-term fallback protection strategies, and other alternative large fire suppression decision making and implementation that is impacting the public and communities.
 - ▶ Each year before fire season, the state and local government and firefighting agencies both state and local must know ahead of time which federal areas will be suppressed rapidly as the state does and how they will be suppressed.
 - ▶ If the federal government has decided to pay less for fire costs off federal lands, then the state needs to put out the fires on federal lands that may cause a cost increase on state and private lands.
 - ▶ If the federal agencies are worried about the long fire seasons, then they need to have more initial attack as the state does to put out fires. Both presidents Carter and Reagan suggested a single federal Department of Natural Resources to improve conservation in the United States that would also result in truly substantial savings in administrative and overhead costs- funding that could be applied to on the ground conservation to include fire- and more effective and efficient conservation. For example, why in Montana, should major federal administrative offices be in Billings (BLM), Missoula (FS) and Helena (FWS) when one could be adequate (let alone combining offices in Butte, Dillon, Billings and elsewhere). Imagine what a single Federal Natural Resource administrative office housed with MFWP or DNR (and in other cities) would bring to effective and efficient resource management and conservation. Not needed is yet another request for increases in state and federal funding, communication and collaboration, and public involvement- ideas with little record of success.
 - ▶ The federal fire agencies should explain why they would not use heavy equipment on their own lands but will on private and state without the landowner's permission.

- ▶ Federal fire agencies should be responsible for all costs, including home protection by the state and local agencies, when fires escape their lands and they have not done initial attack similar as the state or local agencies have initial attack.
- ▶ There were many comments on how the federal fire agencies can communicate with state, local, and private better as well as issues on how fires are fought. The agencies say they are listening, then why are these issues being brought to the committee if the feds said they were listening?
- ▶ Fire should be dealt with differently in drought years than normal years. In drought years, a more aggressive approach should be used.
- ▶ Federal agencies may not burn or back burn private land without permission of the landowner or the state if the fire starts on federal lands.
- ▶ Under no circumstance should the state take over fire fighting for Big Sky from the federal government.
- ▶ With the concern of global warming, the federal government must take into consideration letting fires burn to release large amounts of CO₂ in the air. There must be limits to the number of fires of major significance that can burn due to global warming.
- ▶ If major fires are allowed to burn, air pollution must be monitored and the federal government must reimburse local agencies and the public for health care risks associated with the pollution.
- ▶ Before there are permanent road closures by the feds, state and local governments, there must be a determination whether the roads are needed for fire suppression activities.
- ▶ The management of forestlands is broken when it comes to fire suppression. There are too many conflicting rules, regulations and values. It is confusing to the public and expectations are misplaced and confusing by the feds and the public toward fire fighting. Until the feds say clearly what they will or will not do regarding fire fighting and fires when fires get out of their lands, it is stressful and harmful to the public who live near the forests and public lands.
- ▶ The people who use the forest or live next to it are upset with the lawsuits from environmentalists, etc. to stop logging, etc. These people need to sue also. Right now the federal land managers are stopped from doing a lot of things so encroach on the landowners next to the forests or stop other multiple use. Those who are losing need to protest also the closure of roads for fire protection, closure of etc to protect fires. Sue to stop letting it burn unless other values are taken into consideration.

- ▶ Watersheds: We need a revised policy, which includes immediate suppression of fires in watershed drainage in drought years. The federal lands must take into account the value of watersheds outside of their lands in determining letting fires burn
- ▶ Stop the environmentalists. Open the woods back up for supervised logging like in the 1970-80s. We didn't have this problem then. It doesn't take a rocket scientist to see why we are in this situation. Market our natural resource. Yes we do need it to be monitored, but what is more expensive? Monitoring or fighting fires? If those who sue lose a lawsuit, they should have to pay for the federal governments costs for the lawsuit.
- ▶ Groups that want to stop the environmentalists need to use the same tactics those groups have- they should sue to stop road closures, etc. due to affects of fires on other lands, wildlands, wildlife etc. Right now the groups that oppose the above, have to react all the time to lawsuits. They need to be proactive and sue also. They are not going to get the Forest Service to change if they react all the time and are not proactive. If the forest service comes to a standstill then maybe things can finally get done on saving the forests.
- ▶ Local groups and governments should be talking to the federal agencies every year and at meetings about how changes should be made in fire policy. There is not the interaction that is necessary for local people to put their input into the fires.
- ▶ There seems to be no importance placed on recreational opportunities in wilderness when it comes to fires. The federal government must reexamine the values they consider when allowing fires to burn and place somewhere in their decision making whether recreational opportunities have a value or not.
- ▶ Outfitters who use the forests need to be allowed back into burned areas and areas of trails as soon as possible after a fire pass through. Some forests say no outfitters may use the trails, etc. until all can use the trails. Outfitters are paying the Forest Service for the use of the land, but they are told to wait until non-payers can go at the same time. This is not fair.
- ▶ The Forest Service should reimburse outfitters for any costs from fees paid to Forest Service and the outfitter cannot use the lands because of fires.
- ▶ The Forest Service should consider subsidizing loss of business insurance for outfitters due to fires.
- ▶ If we continue the way we are, with current polices and never ending environmental law suits, I predict one third or more of our forested lands will be destroyed by fires over the next decade or so. We need to think outside the box in getting everyone to the table community-by-community to plan; pass litigation legislation that mandates payments of costs and penalties for frivolous suits that stop management plans, and harness the energy

of wood products harvesters and responsible citizens to help with thinning and gather wood so our forests more closely resemble those of Germany and Switzerland. As fuel prices increase, there are many who would gladly help cut and who would burn the medium slash in homes and businesses.

- ▶ In recent years too many fires, because of federal policies, including let burn policies and locked gates restricting access when fires were small, have been allowed to grow until virtually uncontrollable. The state of Montana needs to re examine any existing memorandums of understanding with the federal agencies to ascertain that policy differences will no longer contribute to excessive suppression costs. There must be an assumption that liability must be assessed when bad policy decisions of agency personnel allow fires to grow to catastrophic size, increase the costs of suppression and endanger the public.
- ▶ The budgets of the Forest Service are in decline in terms of real dollars available for management. Until their budgets can stabilize and not be used to fight fires each year, the Forest Service and other federal agencies are unable to manage the forests as they plan.
- ▶ The federal agencies should not have any more involvement with suppression of fires involving fighting structures.
- ▶ It is okay to burn up grass and private timber and small businesses since they are not considered values by the feds. What a terrible neighbor. If a private landowner starts a fire and it goes onto federal land that pays for the costs.
- ▶ Federal policy makers must re examine their own definitions of "Wildland fire use" and the new term "fire uses fire" to determine their worth in the overall scheme of things. It is time for them to not only count the cost, but also face related liability when use of fire as a toll results in out of control fires spreading to other jurisdictions.
- ▶ Our firefighters should be held blameless or be given immunity to prosecution in any takings assessed by federal agencies relative to alleged infractions of federal law or administrative rules. This means when a decision is pending, human safety and property protection must be placed ahead of alleged endangered species considerations. Inasmuch as DNRC has set in motion a plan on state lands to protect itself from "unintended takings", I can think of no more fitting application for claiming that immunity.
- ▶ If we have a current drought, why is the federal government allowing watersheds to burn up?
- ▶ The first objective of the Forest Service is forest health not all the other stuff.
- ▶ If fires are natural then why do the federal agencies spend so much time "directing" the fire?

- ▶ Permittees that have lost use of the land on federal lands should be reimbursed for the fees paid for that lease for the time of loss of that lease.
- ▶ The federal fire agencies should consider loss of business insurance for those who use the forestlands as permittees but cannot use it due to fire.
- ▶ There is not always a consistent policy between and within agencies in regard to fire suppression. One agency may attempt to save all homes in danger of a wildfire regardless of a lack of an effort by homeowners to fire wise the property. Other agencies may not. Recommend agreeing to a consistent policy recognizing the available resources and time constraints may vary by fire.
- ▶ Large, long term stewardship contracts like currently in place on the Apache-Sitgreaves NF in Arizona are not being encouraged in Montana primarily because of the lack of leadership and the bonding requirements required by the Federal Acquisitions Act. Recommend that land managers to take more risk and implement long term stewardship contracts when economics allows. Also encourage federal legislation that reduces or eliminates the cancellation bond currently required for these contracts.

FEDERAL, STATE AND LOCAL COMMUNICATION

- ▶ Federal and state fire management plans need a complete annual review to ensure everyone is on the same page. Do not have to agree but talking about fire control during the fire season is too late.
- ▶ The federal and state officials should have local meetings at least twice a year, which are widely advertised.
- ▶ State and federal agencies need to do a survey or what the public thinks in the area after a fire has been fought. The agencies review how they fought the fires afterwards, but they do not get public and local review. This should not be done in a public hearing but a good survey that people can fill out in the local area.
- ▶ More interagency dialogue, collaborative policy making, and increased agency administrator and public education are needed in defining agency fire suppression missions and in structuring future long-duration fire suppression strategies.

ROADS

- ▶ Roads are being currently seasonally closed on federal lands and are often impassible to firefighters because of the lack of maintenance. If a road is going to remain on the transportation system it should be made accessible to firefighters.

- ▶ Roads are being obliterated and closed on federal lands making fire suppression more difficult and expensive. Consider fire access and response time when making the decision to close or obliterate a road.
- ▶ There should be maps of logging roads and other roads now in place that should be used as a grid for preventing forest fires and managing the forest. Certain roads should be for multiple uses by the public and a yearly fee should be paid for management uses.

TRIBAL

- ▶ The BIA under a 638 program once funded fire protection program for Northern Cheyenne. Not now. These cuts affect fighting fires as well as other programs such as Hazmat incidents, car extrication, structure fire protection and a variety of other services to help keep our community safe. Currently our Tribe itself owns no fire fighting apparatus. Our trucks are the property of the BIA. We have a good core of volunteers and we keep up on our training. Without any equipment or funding it makes life pretty tough. We have tried to request equipment but the counties seem to have their needs also which overshadow ours.
- ▶ As far as wildfires are concerned we are served by the Northern Cheyenne Forestry which is a BIA run department. They do a pretty good job but they rely on us for structure protection and occasionally water support. They are paid from 8-5 and sometimes during slow times in the season they are not readily available after hours. During these times we are available and are often called upon.
- ▶ We often respond to county fires off the reservation, and provide mutual aid to these counties without receiving any compensation.
- ▶ Basically we need equipment and funding to keep our efforts alive. I feel as a volunteer fire department we are at a disadvantage being on the reservation as we receive no funding from the counties or state and our federal funding have now been cut off.
- ▶ The state should form its own rapid response team and work with the tribes to have crews work directly with the state on a contract basis each summer.
- ▶ The state of Montana should receive 10 million each year from the federal government to fight fires as they leave the forest or are adjacent and within the forest that are fought by the state themselves. The state could contract with various contractors including tribal fire crews to fight the fires. This provides Montanans to fight the fires when we need to fight them.
- ▶ The state needs clearly negotiated understanding on mutual aid between tribal governments and the state on suppression of fires on either border of their lands.

- ▶ Tribal fire departments should also be entitled to state fire engines or have a separate program for them in order to receive state fire engines as the local county governments and local fire departments do now.
- ▶ The Confederated Salish and Kootenai Tribes believe that initial and extended attack operations are still very efficient and safe as demonstrated by historical fire statistics and specific fire suppression actions associated with the 2007 fire season. Large fire organizations are also very safe, but are less efficient in suppression operations due to sheer number and size of wildland fires due to the existing climate of extended droughts, historically low summer fuel moisture, and record-breaking weather conditions.

Maintaining initial and extended attack successes are dependent on high levels of interagency cooperation and our abilities to supplement critically short fire suppression resources with fire severity funding.

We need to maintain our high levels of interagency cooperation into the future, and improve in a sharing of ground and aviation resources on a local, zone, and regional basis to address expected shortages of resources during an escalating period of hotter summers and increased fire occurrence.

We would recommend that all wildland fire suppression agencies (Federal, State, Tribal) ensure and protect supplemental fire severity funding processes for the hiring of emergency manpower, equipment, and aircraft. The State looks to Tribes for hand crews and heavy equipment resources, the Tribes look to the state for aircraft support. A pre-planned sharing of critical fire suppression resources is very important to interagency initial response, mutual aid successes.

LOCAL GOVERNMENTS

- ▶ Pass legislation to allow local fire agencies to declare imminent threats to their areas of responsibility on fires located in the federal forest or on state lands. Upon an agency declaring imminent threat make the legislation require DNRC and USFS to form a unified command with the local agency to establish common objectives.
- ▶ Counties must have full authority and responsibility to:
 - regulate how growth within the county occurs;
 - require county wide comprehensive land use planning and zoning;
 - regulate road location, design, and construction standards for subdivisions and residences that insure safe ingress and egress for engines, water tenders, large trucks and fire crew transport equipment.
- ▶ If the feds have said they will no longer do structure protection and the state does not have the resources, why bother with the zoning, etc. since the state more than the feds are going to protect most of the structures.

- ▶ Restructure policies and SOPs – standard operating procedures of paid and volunteer fire departments. Make sure grant money is being spent appropriately, train departments to respond more efficiently, develop water sources, upgrade mapping, enforce a proper road construction and access policy, encourage training and awareness so county departments do not accept assignments that are beyond their scope of experience.
- ▶ Fire restrictions and closures vs. private property rights must be addressed, particularly agriculture harvest operations. Jurisdiction and enforcement are often unclear.
- ▶ Teams dedicated solely to population protection functions do not exist. Resources assigned to those duties must be reassigned from core functions by the home department or departments providing mutual aid.
- ▶ Local government reimbursement for population protection functions is divided between fire suppression and disaster funding (state and federal). Guidelines and procedures need to be more clearly defined.
- ▶ There should be community wildfire protection plans in every county.
- ▶ Federal AFC program specifically discriminates against small rural volunteer fire companies in the evaluation and award of federal grant funds.
- ▶ The federal FEPP program, which is specifically designed to support rural fire organizations, does not support these local organizations in Montana because of the vehicle classification issue with the working capital fund of the USDA. DNRC is hoping by the end of February that they will be able to screen dept of defense bases as a higher level for useable equipment.
- ▶ The Montana DNRC county co-op program has been providing and replacing wildland engines to mainly eastern Montana since 1967, The West Kootenai area, along with most of Western Montana, does not meet the primary requirements.
- ▶ Local agencies need to be clear to the public and homeowners the capability for what can be done in fires both large and small and with the limited resources that they have.
- ▶ Local and state agencies need to request public review and comments on how fires were fought.

STATE FIRE FIREFIGHTING

- ▶ Need to be clear to be public on what fires you fight and how. Need to be clear to the public and homeowners on the capability of what can be done in fires or not with the resources the state has.

- ▶ There is a need for funding still need incident business advisors at all major fires to save the state money.
- ▶ Need title to our helicopters.

RURAL AND LOCAL FIRE DEPARTMENTS

- ▶ Rural fire departments are having a difficult time recruiting and retraining volunteer fire fighters.
- ▶ Have an inadequate budget for maintenance effectiveness.
- ▶ Mandated training and contracting requirements have resulted in inflexibility at all levels of fire suppression.
- ▶ Rural fire departments need to be able to address the needs of growth though impact and mitigation fees.
- ▶ There is a serious problem with demographics, in the future with there will be fewer firefighters being able to fight fires.
- ▶ Evolve local fire departments having the greatest potential for fire prevention, structure and woodland fire suppression capability and need into quasi-volunteer professional entities. Streamline by giving fire departments immediate access and oversight to one state firefighting board of directors composed of firefighting chiefs, officers and heads of departments. This would essentially be NRCG with full and primary participation by representative fire department chiefs with a goal and responsibility to develop, train, fund, and support local resources.
- ▶ There is a good opportunity to offer vocational and or for-credit fire fighting courses through local community colleges. State subsidized and coordinated by the state fire board of directors above, fire academies could be established and organized with rural communities at local community college campuses across the state. Statewide oversight can assure national qualification standards are met. Local community colleges can be organized as part of the fire academy to keep records of training and assist firefighters to progress though a career ladder.
- ▶ State should subsidize local fire department funding above and beyond that which is assessed for structure fire protection by local communities. Pay firefighters and apparatus a decent hourly wage at federal rates whenever assigned on a wildland fire or structure fire within a wildland fire incident. Streamline the payment process making pay for people and equipment much easier, fairer, and more direct than now exists.

- ▶ Protect primary jobs when local firefighters are called on wildland fire incidents. This would extend the same protection to firefighters as given to Montana State National Guard personnel.
- ▶ DNRC relies heavily on the volunteer fire departments to support them once a fire has transitioned past initial attack status. In fact Montana law requires the state to relieve those volunteer resources so they can get rested and return to initial attack status. Too often the volunteer departments are required to stay on the incident until it is over sometimes extra pay for wages and operating expenses are promised and then not paid when the fire is over. This has left a lot of bad feelings towards the DNRC.
(*Editor's note: Staff is unaware of a statute as the one described above.*)

INCIDENT MANAGEMENT TEAMS / FIRE TRAINING

- ▶ There is a lack of obtainable training. Most fire fighters have little time to go to the fire training college. So we spend time training trainers.
- ▶ Incident management teams are losing personnel and qualified individuals are hesitant to join teams because of the risk of personal litigation.
- ▶ Incident management teams are often from other parts of the country and lack the local color needed to make them more effective.
- ▶ Incident management teams may not be available in critical areas. Recommend pre position teams into critical areas.

VOLUNTEER FIRE FIGHTING

- ▶ Volunteer crews may need more training.
- ▶ We have some crews that have few resources while others have a lot more plus volunteers that are trained. Perhaps we should spend more money at the state level, instead of the state giving money to the locals and help the state have good professional crews.
- ▶ Local volunteer fire trucks get to a fire. When state or BLM trucks get there it takes them a long time before they actually get water on the fire. I understand safety, but speed up the paperwork or do it when the fire is under control.
- ▶ In eastern Montana there needs to be better coordination with the local ranchers. Their grass pasture and livelihood are at risk; therefore, they need to be involved in tactics and the planning.

RESOURCE DISPATCH AND COORDINATION

- ▶ There currently exists no statewide standardized means of facilitating the ordering, dispatching and tracking of local government agencies resources. While there are pockets of cooperative mutual aid dispatching, no uniformly effective and standard procedure assures timely notification and response of local agency units on a regional, intrastate or interstate basis. In time of critical need, bureaucratic red tape, archaic pre-response regulations and local preferences delay and inhibit initial attack or compromise support of state and federal units.
- ▶ In reviewing the orderly dispatching, assembly and response of local agency resources in other areas throughout the western states, several highly proven models are in affect and have proven extremely beneficial in terms of both timely response as well as effective management of interagency resources.
- ▶ A system established and disciplined in conjunction with regional or zone dispatch/communication centers with immediate access to pre-determined agency resources; categorized in conjunction with the ICS kind and type identification system, would assure dramatic improvement in response, coordination and utilization of resources.
- ▶ Enhancing our expectation to comply with the tenets and principles of the NIMS should be a mandate. For too long our state has been without advocacy to accelerate participation in the Interstate Mutual aid system and the Intrastate Mutual Aid System. Both of which would generate expansion and benefit of improved operational readiness and deployment.
- ▶ The existing conflicting layers of often contradictory and arbitrary selection of local government units causes confusion, distrust and undermines interoperability, the essence of the NIMS.

TRAINING AND CERTIFICATION

- ▶ While universal acceptance and support has been established for standardized training and qualification (NWCG and NFPA) of personnel, a lack of accountability stemming from administrators without real credibility is a source of valid apprehension on the part of line supervisors. Again, other states have implemented the state initiated and maintained Peer Review Group method of credentialing eligible personnel.
- ▶ The consensus of a state group representing agencies likely to utilize local personnel is positioned to verify eligibility or recommend steps necessary for credentialing.

PRIVATE CONTRACTORS

- ▶ Type I and type II fires need to rely more heavily on local fire departments. Currently the emphasis is on using contract crews. Contract crews are less motivated to extinguish fires simply because the longer the fire burns the more they get paid.
- ▶ Respecting the private enterprise system, private contractors do not need subsidizing, but do need to have training opportunities available. Local community college fire academies can be geared to private needs to develop progressive training in all phases of fire incident organization. Databases can be maintained with local fire departments to keep track of training taken and trainees.
- ▶ There needs to be a more streamlined and liberal process to hire private contractors that have proven utility and effectiveness. Competition is good and necessary-and standards need to be met- but hiring a contractor based on local value should be easier than it is.
- ▶ Contract food services need a good hard look. The caterers are following strict contracts to provide every firefighter a set number of calories per meal. That works for the line firefighters but there are 100 to 200 people in support positions that are being overfed every day. There needs to be a distinction between the quantities of food served to a line firefighter, and the quantity served to a support firefighter. Agencies need to check the waste on food not eaten.
- ▶ More effort should be made to allow local volunteer firefighters to do what they are trained to do, put fires out. Contracted crews get paid for the time they are there on a fire, not for putting the fire out, therefore they have little interest in saving a ranchers grassland, the longer the fire burns the more they get paid.
- ▶ Contracts would work better if they were seasonal in length and paid out over a season where there is a fire or not. That would allow fires to be put out without the worry of allowing the fire to burn longer and people get paid more.
- ▶ The current requirements for contracting are unrealistic and centered at discouraging the private industry participation. Be advised that agency and volunteer departments are not required to meet the same standards, but they continue to work fires each year. Example:

The Department of Transportation (DOT) requires that all commercial haulers that transport freight for profit over the public road system be registered. A commercial driver's license is required for all vehicles with a gross vehicle weight over 26,000 pounds. Endorsements are also required for air brakes, hazmat, doubles and triples, passenger bus, etc.

Under the current best value process each vehicle is required to register as a commercial hauler with the DOT when in fact the DOT does not require their registration whatsoever.

(Editor's note: The DOT was contacted regarding this comment; any commercial

hauler that utilizes public roadways needs to register.)

- ▶ Weight restrictions for engines are an issue. The old standard for the engines has changed to make the use of all currently approved engines illegal, even though they meet weight restrictions to legally haul according to the DOT. Example:

The minimum allowable gallons that a type 6 wildland engines was changed from 150 gallons to 250 gallons then the hose reel was made mandatory and it had to have a one-inch hard rubber hose on it. This made the use of a one ton four wheel drive no longer possible, and unless you were able to completely build a new engine using a larger truck you could not pass the pre-season inspection even though your engine had been working fine before. Volunteer departments could still work their engines according to the old standard. Cost for a new engine varies from \$80,000 up.

- ▶ Private contract services are not always used. Many contractors have built engines, trained their staff, and purchased all protective clothing, fire fittings, fire hose, and fire equipment to comply with the agency requirement. They have purchased the required contract insurance and workman's compensation insurance. They have gone thru the rigid fire equipment inspection so they could be placed on the agency's list of resources. All this money is required to be spent up front along with an obligation by the contractor to be available 24/7 throughout fire season. Then a fire broke out within their district and they never were called. Resources just like theirs were brought in from other towns, districts, even from out of state. If they called their dispatch to find out what was going on they were often treated rudely or told that when they were needed they would be called. Many times it helped to be friends with the dispatcher or their supervisor, but if anyone said anything or made public inquires they were committing professional suicide and never dispatched again.
- ▶ All resources are not treated the same. When signed up on a fire, each resource is categorized as agency, volunteer, or private. When each supervisor looks at that resource they know whom they work for and treat them accordingly not equally. A good summary is the best and most productive workers aren't always the last to go as production and hard work is not the priority on many incidents. Safety is discussed but not practiced and some resources are not treated the same or required to do the same tasks as others.
- ▶ Other states have the same requirements but they work all their contractors on wildfire suppression and prescribed burns. This allows the contractors to make enough money to survive and guarantees that they will be there year after year. It is important for a fire commander to know a resources are capable of doing and working on prescribe fire is one sure way to find out. Prescribed fire gets everyone used to working together and provides a cost efficient method of fire prevention for the district.
- ▶ Montana DNRC makes the contractors compete with their own tax dollars when they hire

a volunteer fire department before a private contractor. These volunteer companies are leaving their districts and working fires out-of-state without their district even knowing what they are doing. This leaves the district they represent short-handed and often the best apparatus is taken so they can't offer the protection that the taxpayer thinks they are getting. There have been cases where catastrophic events have occurred and most of the fire departments resources were out of the district on another fire as a contract engine.

- ▶ The contracting section in the Lolo forest needs to be more user-friendly.
- ▶ The state should revise the contracts made with the seasonal workers. A private contractor pays a set amount per 24 hours, during which an employee can be called at any time to work and is generally expected to work up to 16 hours of that time. Absolutely no alcohol consumption is allowed during those 24 hours (times number of days); and during the times when fire activity does not call upon their services, they are often times offered the opportunity to participate in some other work such as thinning job. This means more bang for the buck. Currently those who are employed by the state, specifically for severity, unless actively on a fire, produce little to nothing during the time they are drawing wages from the state. People should not drink before any work the next day.
- ▶ Should the state hire more seasonal workers instead of hiring private contractors for severity? But one can figure out the costs easily. Right now we pay a lot when we could contract for the season at a lower rate.
- ▶ For too long now, the expectation of entitlement has influenced resource selection. The annual statistics of firefighter injuries and fatalities tend to support this connection.
- ▶ The Emergency Equipment Rental Agreement (EERA) resources will always be an alternative available to fire suppression administrators. This provides them with a source for fire suppression resources upon exhaustion of those available by contract. The concern is two fold.
 1. The continued use of EERA resources on fires while contract resources are being sent away. This is a direct violation of the agencies obligation for the employment of contract engines. This may be because once an EERA resource is on an incident; fire personnel have no way to easily and definitively identify a resource as EERA. These resources need to be readily recognizable to incident personnel so they can be managed in accordance with their agreements. Recommend that there be a prominent entry in a piece of EERA equipment's resource.
 2. Plans and finance personnel need to be trained to spot this entry upon the equipment's check in at an incident and made aware of the limitations this type contract places on its employment. Further, the equipment should be identified in t-cards and documentation so plans and resource management

personnel would be aware that they should be among the first units to be de-mobbed.

- ▶ It is unfair to those who equip and maintain engines in accordance with Chapter 20 and Region One contract specifications as well as to the fire management personnel on an incident to allow EERA equipment on the line that does not meet the same standards for complements and conditions as do contract engines.
- ▶ Equipment complements and standards on an incident should apply to all. The crews of EERA engines and tenders should have to meet the same standards for training, condition and equipment as required of the contracted engines crew persons, including the crew complement. The 2007 season type six EERA engines only required a crew of two people while the contract engines required a crew of three people. If so, this allowed the agencies to violate their own standards.
- ▶ Private contractor (Best Value and EERA) firefighting resources are important to our fire suppression successes in Montana. We believe that all wildland fire suppression agencies try to use these resources on a fair and equitable basis. Dispatching and resource hiring and assignment difficulties arise during very chaotic times during multiple large fire situations. Successful assignment and use of private contractors depends on effective pre-planning and implementation by dispatch and incident support organizations.

Use of private firefighting equipment continues to be a very complex situation. The Confederated Salish and Kootenai Tribes believe there are many things that can be done to improve contractor use and services. The local contractors can help improve the situation by meeting pre-season paperwork and equipment inspection deadlines and by improving their track record on annual firefighter training and incident qualification and certification processes.

The Tribes would recommend continued interagency support of local and zone equipment boards and committee activities, the fire suppression equipment best value system, and other fire business and equipment procurement activities. All dispatch organizations need to adhere to strict resource list rotations, contractor services information support, and equipment inspection timelines to fulfill local extended attack and large fire resources ordering and assignment processes.

FIRE FIGHTING TECHNIQUES

- ▶ Stop this "back fire" control stuff. Let the local fire people fight them.
- ▶ Some of the problem for firefighters is locked gates and sometimes waiting hours for someone to arrive with a key.
- ▶ Eliminate the use of type 6 engines on major fires. These are initial attack resources. If

you need personnel, hire individuals; or if you need engines, hire type 3 or better, not type 6 pick up pumpers with 150-200 gallons of water.

- ▶ Use aircraft more efficiently. Use fixed wing aircraft on initial attack; and don't be unwilling to divert loaded aircraft that are in the air and working another fire to an incident that is just starting. Use rotary aircraft where they do the most good in support of ground attack activities.
- ▶ Provide support (aircraft, bulldozers, hand crews) to local fire agencies upon request on any fire in the interface without having to wait until an officer of DNRC or the USFC arrives on the scene.
- ▶ Not clear why some private lands are burned and others are not. The policy needs to be explained by fire agencies.
- ▶ Open closed gates temporarily in appropriate places, in a safe season in previously burned areas so firewood gatherers can supply their needs creating a low fuel fire land where fire might be stopped.
- ▶ Allow people to volunteer to help.
- ▶ Station groups of tribal fire fighters in rural communities with only volunteer fire departments during high fire danger to provide extra resources.
- ▶ Stop making fire lines behind the fire. Three days after the fire had burned across our land they wanted to run a cat through our place and make a fire line. Everything was burned and black and the fire was headed the other direction, it could not come back because all the fuels were already burned.
- ▶ Stop making back burns. When things are very dry we need less fire not more.
- ▶ When back burns are made there must be all the necessary resources available and if they are not then it should not be done. If the resources are not available and a back burn is allowed then that agency is responsible for the costs of the fire incurred by landowners affected- grass, hay, fences, if it gets away.
- ▶ Pay fire fighters a bonus if the fire is put out in the first 24 hours.
- ▶ Include local volunteer fire chiefs or assisted fire chiefs on type I and type II teams.
- ▶ Bring back private firefighters to work each district under a severity contract. This is a proven method, which saves the district money and allows quick first response to a wildfire. A severity contract permits a contractor to provide fire protection to a specific district. This type of protection is defined as initial attack, which puts resources on an

incident before it can get very large. The amount of resources required and their cost are incidental compared to their effectiveness and benefit to a district should a large fire occur.

- ▶ Severity contracts provide trained personnel who size up the incident and contain the wildfire or notify the district that resources are needed. Then they direct additional resources to the location, identify water sources, hazards, secure area where the fire started, assist with operations, etc.
- ▶ Very often severity engines and crews are all each district requires and by patrolling 7 days each week they prevent large wildfires human or natural caused. They are also more dedicated than volunteer departments as this is not a sideline or a volunteer effort it is what they do for a living. The district is only required to pay for them as long as they are needed and they work well with the local people. This eliminates the need for a year around fire crew, new apparatus and support equipment each year, affiliated waste etc. that is what is happening now.
- ▶ Form type 2, type 3 and type 4 teams made up specifically of contract firefighters. They are better trained and ready to go. By organizing these teams you eliminate the liability of unprepared personnel and un- experienced firefighters.
- ▶ Montana does little prescribed fire as part of their fuels reduction. There is a great need for this.
- ▶ The current program provides a very negligible reclamation effort. Weeds are rarely addressed, re seeding is only done by air which is expensive and the results are questionable. The reclaiming of fire lines, repair of roads, fence reconstruction, and silt and erosion control are rarely finished and in some cases not done at all. Minimal effort is given to see that the work was even done. The obvious conclusion from a landowner standpoint concerning impact to their property is that extensive damage was caused and nothing was done to make it right.
- ▶ Eliminate the overt abuse of air support by division assignments that use tenders, engines, hand crews and good old hard work. We used to put out a lot of fire when there were no helicopters available by using hose lines, engines and water tenders.
- ▶ Water sources are not developed to provide fill sites for initial attack equipment. Mapping is done poorly or not at all so responding resources are going in blind with no information unless they collect it themselves.
- ▶ Policy requires that any resources that are on the incident engaged in actual fire suppression be stopped and removed even if there are no resources available to take over. When resources finally do arrive they typically arrive on the incident by late morning when fire activity is just picking up making their efforts fruitless. Too much emphasis is

placed on air support while ground resources are assigned to secondary objectives.

FIRE SUPPRESSION AND FIRE FIGHTING

- ▶ If a fire is not immediately suppressed as under state guidelines then the agency is responsible for the costs of the fire on private and state lands.
- ▶ We need to relax some of the rules. Firefighter safety is of major importance and a great concern but, anyone who has ever fought a rangeland fire knows that more progress can be made in the night when winds die down and humidity rises. Having to work in daylight hours only makes it harder to control fires.
- ▶ We need to have more local involvement in decisions made by management teams. We as stewards of this land know the terrain, know the area, where roads are, so we are capable of making some decisions without someone from another state telling us where and what to do. No one knows a ranch better than the rancher.
- ▶ Capacity issues in assisting with suppression and/or increased demands for the response operation. Montana needs to have a tactical team in place including a local official in each county to respond within minutes to hours not days to a fire. This plan must include helicopters or retardant planes that can respond to a crisis immediately.
- ▶ Does Montana have a tactical team now? First responders in the areas are generally tactical response teams from different federal agencies. This results in a horrid bottleneck of bureaucratic politics that strangles their ability to deal with immediate threats.
- ▶ The Forest Service and state need to take into account water and watershed protection during fire season.
- ▶ The state must take a more active role during the fire season to protect values outside of the federal lands and push the feds to do more to contain the fires within their boundaries.
- ▶ We need fire management procedures that fit across a large area but in many cases the procedure needs to be at a watershed level. Let be prepared now, not after the fire has started.
- ▶ Let's bring in the scientists that look at long and short-term fire control. Not all agencies or private sectors either but a variety to consider views.
- ▶ The Confederated Salish and Kootenai Tribes believe that over the next ten years, Montana wildland fire agencies will experience decreased fire suppression capabilities and effectiveness, with greater safety risks to firefighters if no changes in policy, practices, or funding are made. State and Tribal agencies are trust asset protection organizations. Both agencies must evaluate our agency missions as full suppression

organizations. Can we afford to suppress all wildland fires (at high costs) in the face of changing climates, increased long-duration fire events and with increasing hazard exposure to our firefighters?

Montana will experience increased impacts to Tribal trust, private, and community lands and properties over the next ten-year period. The Tribes believe that governments should support preparedness, hazard fuel reduction, fire severity, and fire prevention information/education budgets to keep pace with expected increases in initial/extended attack and long-duration fire workloads.

INITIAL ATTACK

- ▶ Waiting for the fires to get to edge of public lands to fight is too late. Need healthy buffers that federal, state and local landowners are free upon, if possible.
- ▶ Pre-position resources in known tinder areas (forest crown), lighting arrestors and treetop hot strike dispatchers, coupled with fire line extinguishers broadcasting chemical suppressants. All placed by helicopter, to perform as a high firewall or 'break' when the wildfire domes or spreads thru the remote, often isolated wilderness forest canopy.

AFTER THE FIRE

- ▶ After each major fire, there should be input by the local entities and private landowners as to reforestation and grass reseeding.
- ▶ It should be clear each fire season by the federal agencies and the state what landowners and others have for resources if they are burned out. It is after or during a fire that these things come up. There should be regular information each year by many entities on what to do after a fire has passed and there is damage.
- ▶ Review the history of logging sales including salvage sales following fire or disease.
- ▶ Big fires are not good since they sterilize the soil. Grass and reforestation are necessary.

TOURISM

- ▶ Encourage all governmental agencies to include tourism organizations when developing their fire communication plans. Frequently the losses to business are due to an inaccurate public perception of the threats of wildfires. Media tends to over exaggerate and sensationalize fires, which leads to visitors canceling trips, and leads to losses to tourism businesses. Working together we can help to manage the publicity implications by creating unified, consistent, accurate messages giving our residents, our visitors, and the media the information they need while mitigating negative impacts to tourism.

- ▶ Allow a single declaration of a "state of emergency" that would be statewide and season long. Each time a declaration is used it creates negative attention to our state and limiting these declarations would be very beneficial for tourism.
- ▶ Large fires have had equally negative effects on small communities that depend on tourism, hunting etc.
- ▶ These fires affect outfitting and hunting and Fish, Wildlife and Parks needs to discuss with Forest Service and other agencies way to promote these activities even though there are fires every year.
- ▶ It is ironic that the Forest Service and other federal agencies say that fires are normal. If they are normal then allow people to live with fires instead of simply shutting down the state and major areas of the state during fires. It is a matter of risk taking and those who are willing to live with fires and willing to live in this state should be able to not be scared by every fire of shut out of other activities during fire season as long as they follow procedures and guidelines on protecting themselves and others.

THINNING

- ▶ Most of the acreage burned in any one year occurs in a relatively few large blazes. In other words if you were to put out all of the other fires, these few fires would account for the bulk of all acreage burned. This is important because of the next point.

Big blazes are driven primarily by climatic conditions- when there is extended drought, low humidity, and high winds, you get big fires. The 1910 burn that scorched 3.5 million acres of northern Idaho and western Montana is a good example. More than half of the acreage that burned occurred on two days, August 21 and what has been known ever since as Black Friday, August 22. That day the winds were roaring across north Idaho and into Montana. This leads to the next point.

When conditions are ripe for a big blaze, and assuming you have an ignition source (lightning or human), you can't stop the fires. You just have to get out of the way or are out of the way (i.e. do not build your house in the woods.)

As consequence of above points, thinning proposal as "fuel reduction" have little impact on fire spread. Thinning does work to reduce fire intensity (how hot it burns), but little to stop the spread of large blazes. This is because high winds blow burning embers as much as a mile or more ahead of any fire front starting new blazes. Unless you were to thin all the forests in the West (an impossible task to say the least), you are going to have little effect on fire spread on a landscape scale- though there may be some benefit to surgical thinning in very specific and concentrated areas- more on that below.

- ▶ There is no predicting where a fire will start and burn. So many things affect fire spread

including the wind direction, topography, past fire and insect history which shares present stand age and species composition. The idea that you can thin forests across the landscape in hope that the areas selected will be the same ones that will likely burn is optimistic at best.

Thinning is not a one-time treatment, when you thin a forest you release a lot of other trees from competition, which rapidly grow till fill holes in the canopy and under story. Unless you are prepared to go back time and time again and re-thin the forest over and over again, you lose much of the fuel reduction value. Long before any federal and state agencies could finish with their first generation of thinning, they would need to go back and repeat the thinning process again on the earlier thinning projects. Are there realistically the funds to pay for all this thinning- only if you accept the commercial logging of big trees to pay for it all- and that results in unacceptable impacts to the forest. Logging big trees to pay for the cutting of small trees is really a "Vietnam strategy" of destroying the forest to save the forest.

Thinning is not a proven strategy. Most of the evidence to support thinning is anecdotal- as many places where advocates claim thinning stopped or slowed a fires, there are other examples where fires burned right through thinned stands. Did the winds slow, for instance, just when it approached a thinned parcel and/or was the topography such that it led to a reduction flames- that had nothing to do with thinning? These kinds of questions are difficult to answer and control, thus proponents of thinning can always claim that thinning was the reason a particular fire slowed down, but often as not thinning has no observable effect on fire spread under severe fire conditions. For instance, much of the forest that was charred in the big Derby fire in Montana was stands of savanna like ponderosa pine. A similar effect was noted in Oregon's Biscuit fire where naturally thin (due to special soil that restricts plant growth), Jeffery pine stands were scorched. In both of these bases, high winds drove flames across the landscape.

Remember even if thinning appears to work under normal fire conditions, it appears to be less effective under severe fire weather. And it's very difficult to replicate these conditions in an experiment. No scientist can thin a forest, then create a super drought, low humidity and winds in excess of fifty miles an hour and have it burn both the thinned and adjacent un-manipulated forest stand at the same time.

Thinning, as a fire hazard reduction strategy, could work under less than severe fire conditions, but fail miserably under the high fire severity climatic conditions.

There is even some evidence that suggests that thinning can actually increase the fire severity and intensity because thinning opens up the forests to more wind and permits greater drying of ground vegetation and the fuels that sustains fire spread.

- ▶ Logging is not a benign activity, nor is it the same selective factor as natural events like fire and beetles. Logging introduces human intrusions into the forest ecosystem. This can

disturb sensitive wildlife like wolverine and grizzly bear. Logging can be a vector for the spread of weeds and disease into the forest. Logging almost certainly creates more sedimentation in streams. Logging removes woody debris (dead wood), which has many ecological functions including providing homes for many invertebrates. Logging removes snags, and the potential for future snags, snags are important for many wildlife species, particularly cavity dwellers. Logging can alter nutrient cycles. Logging roads, even closed and reclaimed roads, often become new OHV (off highway vehicle) routes. Furthermore logging tends to select against early succession species that are favored by fire and beetles, and also skews age classes.

- ▶ Where thinning may be appropriate is for community protection, i.e. if you thin say within a half mile or less of community or whatever, and you can get a big fire fighting force in the area, thinning can sometimes help to slow a fire enough that fire fighters can put it out. However you have to have a lot of fire fighters on the scene for this to be effective- and the only time you can cost effectively justify this kind of force is to protect structures. For instance in 1988 in Yellowstone, there were a massive effort to protect Old Faithful Inn, this worked because you could get hundreds of firefighters in one spot, but you're not going to get that kind of force to focus on a big fire front that may be miles wide.
- ▶ Finally nearly all efforts to reduce big blazes and restore health forests assume that health forest is ones with few dead trees and without large fires. This may itself be a flawed assumption. Many ecologists would argue that a healthy forest has a good share of dead trees and at some times in the natural course of events, to have a great many dead trees. The same can be said for large fires- large stand replacement blazes may be ecologically important.
- ▶ The bottom line is that we should seriously question whether we need any manipulation of our forests. I believe the forests are effectively capable of taking care of themselves. After all they have been operating without our aid for a lot longer than we have even assisted. They are used to drought, fires, beetles, and even changing climate. In the face of global climate change, protecting large tracts of un-manipulated landscapes may be the real salvation of our forests.
- ▶ Early detection and aggressive initial attack can be the most important steps to reduce costs and degradation of our air and water.
- ▶ Thinning may be appropriate for community protection, i.e. if you thin say within a half mile or less of a community or whatever, and you can get a big fire fighting force in the area, thinning can sometimes help to slow a fire enough that fire fighters can put it out. However, you have to have a lot of fire fighters on the scene for this to be effective- and the only time you can cost effectively justify this kind of force is to protect structures.
- ▶ There are those that claim that because major wildfires have burned though industrial

timberlands, there is obviously no reduction in fire risk due to harvesting by the timber companies. Use some industrial timberlands that were thinned have burned, but the acreage of such burns is far less than other types of forestlands that were not previously thinned.

- ▶ Need a report each year of acres of natural timberland burned, acres of pre-thinned timberland burned, acres of pre-harvested timberland and acres of grassland.
- ▶ The term wildfire and wildfire hazard are part of a very broad spectrum of situations that should not be applied equally. The most hazardous fuel conditions consists of large amounts of fine fuels such as cured tall grasses, brush and fine woody debris. Wildfire statistics show that range and brushfires have caused the most damage and injury to human health not forest fires. Grass and brush fires can burn with high intensity and travel at great speeds, making fire suppression very difficult and dangerous. Forest fires can burn with great intensity in dense forests and/or with high surface fuel loading conditions, but do not typically travel with great speed.
- ▶ Most forest fires are contained in areas where fuel treatments have occurred that prevent active crown fires and thinned trees suppress understory fuels such as grasses and a combination of moderate forest thinning, followed by controlled burning, can lead to less catastrophic fires. This two-step process, thin and burn can help reduce anticipated future catastrophic wildfires with their consummate massive emissions of greenhouse gases and ecosystem devastation.
- ▶ The policy by the feds does not allow the timely removal of dead timber and vegetation-fuel reduction projects. There are little or no efforts made to provide even the smallest degree of preparation in fire prone areas such as firebreaks and clearings in high fire urban areas. Roads are not maintained or bridges constructed to allow access of fire apparatus and resources.
- ▶ We still have too many man caused fires started from slash burning. Grants should be made available to subsidize low cost removal of pulp and biomass.
- ▶ At the present time, my ability to hand pile and burn debris is restricted. I cannot burn during the months of December, Jan and Feb. This is an arbitrary impediment that has to do with air quality but ignores the fact that on well ventilated days it could be done. The regulation restricts us entirely during the three months of the year when fire danger is lowers and burning would be safe.
- ▶ The wide spread loss of lodge pole pine coupled with high-energy prices should allow us to capitalize on the potential of wood to reduce fuel bills. At the present time we permit curing without requiring piling and burning of the residue. In addition county road crews on occasion clear adjacent to road right of ways and simply leave the debris. Consequently we have a dangerous accumulation of debris along roadsides that present

the potential for careless ignition in areas laden with fuel.

- ▶ We need stewardship training for those we permit, and would now encourage, utilizing firewood and perhaps engaging in fuel reduction. We also need to create an equivalent of the Civil Conservation Corps to address fuel reduction along travel routes, wood cutting areas and the rural urban interface. Such a program could be funded from the coal trust fund created under the coal severance tax.

LOGGING

- ▶ Big wildfires can be prevented by more logging trees.
- ▶ Any logging or large-scale logging should include re planting new little trees.
- ▶ Stop fires before they get too big and out of control by checkerboard logging.
- ▶ You can let the fire burn the tress or cut it.
- ▶ The forest between Boulder and Butte is dead. Why isn't the Forest Service doing anything to remedy the situation? They should at least tell people what to expect sooner or later.
- ▶ Burning of slash has caused many large run away fires. It is unnecessary to burn slash anymore. Technology is available in this country to harvest slash from logging and thinning and use it to create energy.
- ▶ Log in a checkerboard fashion such as every other section. Cut 80% of the tress in some areas and leave the other 20%.
- ▶ Allow modern style logging into our threaten forestland within three months after a fire.
- ▶ Reducing fuel is an absolute effective tool to reduce fire intensity. One of the most effective tools to reduce fire severity on public and private lands will be to increase the acreage of fuel reduction; timber harvest operations. Big fires lose intensity when they spread into harvested areas. Our operation chiefs are always looking for road access and for areas that have the fuel loads reduced. Fire behavior changes significantly when the main fire reaches an area that had been harvested or had some sort of fuel reduction treatment.
- ▶ We are running out of loggers and soon there will not be any. Then options are gone forever for thinning.
- ▶ Diseased and dying forests need to be harvested and treated as long as it is economically feasible.

- ▶ Our forests and rangelands need to be managed for the long run- 100 plus years not for the next ten years.

REDUCTION OF FIRE SUPPRESSION COSTS

- ▶ Invest in fire prevention/education, early detection, and rapid suppression.
- ▶ The earlier you can implement mitigation, the fewer resources you will need to expend for fire suppression. Fuel reduction; fire breaks on both public and private land are very important. Opportunities for prevention include closer mowing along the highway right of way and a dozer line. This concept could be implemented stateside by the Montana Department of Transportation high-risk locations for low cost, highly effective prevention.
- ▶ Another prevention opportunity becomes obvious where subdivisions interface national Forest Service land. Viewed from above, there are clearly identified vegetation corridors of contiguous dense trees that would be an indefensible corridor for fire transmission. Again adequate preemptive fire breaks on both private and public land would provide protection for private property and would save substantial suppression costs.
- ▶ Stillwater County had a horrible fire season in 2006 and then one significantly better in 2007. The difference between the two was clearly the very quick deployment of aircraft dropped water and retardant resources to the initial stages of the 2007 fires.
- ▶ Wildfires in mountainous terrain are nearly impossible to control with trucks and men on the ground. We have learned that once a fire gets to a size over 100 acres, we are dependent on the weather for significant control. Most importantly we have learned that if fires are attacked right away with air operations equipment, we save property, lives and money. Please put up more resources into firefighting airplanes, helicopters and the related support services needed to allow them to be deployed at the earliest evidence of a fire start, especially in areas of denser populations.
- ▶ The federal and tribal agencies need to allow the state to have the state provide initial attack with air resources when they spot a fire unless the feds have said no in an area weeks before.
- ▶ The modern practice of not fighting a fire at sundown has to cease. Nighttime, even though more dangerous, is a very good time to fight a forest fire.
- ▶ The state of Montana should cap spending on fire suppression. The total should be \$40 million per biennium. DNRC may use the money for fire suppression besides their regular costs appropriated by the legislature. Money left over stays in the fund.

- ▶ There needs to be time studies regarding to how many are fighting the fires and when versus waiting for a fire. We are spending way too much waiting for a fire and fighting a fire for various reasons.
- ▶ There is no reason that the cost of the fires the last several years could not have been cut down by at least 50%. But until it is clear what the Forest Service and federal government are fighting fires for and with, the costs will continue to be enormous.
- ▶ At the end of each fire season, fire managers should go back and review how the fires could have been reduced in cost from what was spent.
- ▶ Until the feds figure out what they are fighting, the cost will continue to escalate. The fires will just get bigger with fewer results in protecting homes and landowners and the public.
- ▶ Letting a fire burn, and it gets out of control, the state is busy trying to protect homes, while the feds say they do not do structure protection is plain wrong. Meriwether and other fires should not have occurred. The state and local agencies should be reimbursed from the feds for fighting those fires not the other way around.
- ▶ Without business people on the ground of fires, the state will lose hundreds of thousands of dollars every year.
- ▶ As more timberlands become real estate, our wildland urban interface is increasing dramatically. As development increases, so does the wildland urban interface; this will cause the cost of firefighting to rise dramatically in future years as the values at risk continue to grow.
- ▶ Fire prevention and education programs need to be funded across the state of Montana through the Forest Service, BLM, DNRC and tribal jurisdictions. Several national forests and DNRC offices across the state do not have dedicated prevention technicians.
- ▶ Bring fire prevention to the forefront of the wildland fire discussions.
- ▶ Currently Montana seeks reimbursement for costs associated with suppressing a fire from those individuals found accountable for igniting the fire. This money goes into the states general fund. Instead create a funding mechanism whereby this money would go to fire prevention and mitigation efforts.
- ▶ As fire danger rises, planning levels increase to bring on more fire suppression resources. Prevention resources should also ramp up as fire danger increases.
- ▶ As it looks like the state will pay a large part of fire costs, the state needs the authority to simply go in and put out a fire or suppress it early on federal lands. We cannot afford to

wait until the fire comes out. We may need to suppress it for watershed values that are not considered now by the federal government. Also when we have these large drought seasons and longer fire seasons, the state needs to put out the fires early on if the federal government will not.

- ▶ It would be simpler for the state to have grass insurance that is subsidized by the feds to pay for the cost to landowners for their grass. Right now it is terrifying to watch the grass burn caused by fires from federal lands that are not being put out.
- ▶ The state of Montana must know what the cost of federal fires which start in the wilderness or non-federal property and wreak destruction in their paths when burning their way on to private or state owned property.
- ▶ Cost reduction is a buzzword with the incident management teams. But they don't practice what they preach. There is considerable waste. There are resources and people that are not fully utilized. On state fires, use a comptroller that oversee and approve expenditures on a daily basis. Include periodic reviews by qualified overhead to question the incident management team about the necessity of people and equipment.
- ▶ Montana does try and reclaim burned wood unlike the federal government.
- ▶ The Montana Legislature must realize we spend too much on fire suppression each year. It is off budget but we still spend it. We must recognize the cost and find other ways to pay for it. One way is to cap the amount and put part toward fuel reduction every year. We need to work for a state fire team to put out fires. The feds must kick in so much money each year for fuel reduction and engine replacements to local governments.
- ▶ Here is a list of ways to save money in suppressing fires:
 - Fully fund the state fire resources; 24/7 coverage for state helicopters and engines.
 - Have incident business advisors on each fire to save money.
 - Enter into agreements with feds to put out fires the state believes will get away.
 - Federal government to buy hay for ranchers who had their grass destroyed.
 - Pay for a percentage of trees lost.
 - Pay for 70% of a fence.
 - Have the feds pay the state \$10 million each year for fuel reduction.
 - Be upfront as to what can or cannot be protected.
 - Give more resources to local governments and entities to fight the fires.
 - Have the state have their own fire management and fire teams to put out larger fires all under state control, the feds to provide \$10 million each year for this.
- ▶ It would be cheaper to prepare for fire fighting than wait for fires. But it is easier to pay for emergency funding both at the state and federal level but far too costly. Fuel reduction around homes and communities, added staff and equipment would save money.

Yet there is concern of too much government so we wait and spend too much government money when the crisis erupts. Where it is cheaper to have government help we need to look at that instead of both parties and all governors waiting for a crisis to spend money we should not be spending at that rate.

- ▶ Cost share agreements must be reviewed during each legislative session. The legislature may wish to pass laws to govern cost share agreements.

STATE FUNDING

- ▶ If the federal agencies will do little more than what they do now in fighting fires, then the state must either put more resources into fighting fires when they come off the federal lands including more control of how fires are fought outside federal boundaries.
- ▶ The state must decide should they act on federal lands to protect private and state lands during extreme drought times or when they feel that the cost of fighting the fires outside of federal lands on their own clearly will cost far more than simply putting and suppressing the fire.
- ▶ The state will sooner or later have to consider having their own response team to do the job that the feds will or have become unable to do now.
- ▶ State and federal management policies contribute to the increased number of wildfires. Fuel reduction programs are not being done in a timely manner if at all so it is easier to wait for a wildfire than to monitor the land with fire resources. The environmental studies and court restrictions are too much trouble to deal with on a low budget besides the state always comes up with the money for fire even if you go over budget. They'll just hold a special session and throw more money at it until it goes away or it snows. No responsible party is ever held accountable. Tax the environmental groups that sue to stop logging to help pay for some of the costs.
- ▶ State and federal agencies will continue to increase their fire departments and millions of acres of grass and trees will be burned when the weather permits. Funding will never be a problem because it is typical of all governments to throw unlimited money at a crisis to make it go away then make the taxpayer recoup the loss.
- ▶ Best value may be good for getting the right contractors for the right price but it does not take into account if the state or federal government had simply hired them as state employees in the first place for year round or seasonal work on fires. In many cases it is cheaper to have seasonal or full time employees and equipment than to contract out for a few weeks at a time.

LAWSUITS

- ▶ Lawsuits stop projects to remove trees. Look at the list of proposed projects minus the amount in lawsuits or appeals.
- ▶ Those who start illegal fires should be sued.
- ▶ The state of Montana should be suing the feds to stop road closures, pollution from fires, carbon dioxide releases from fires, etc.
- ▶ It is not right that a handful of lay people to be able to file some type of legal action and ask a judge to overrule these professionals.
- ▶ The national appeals process needs to be repealed and revised so only local stakeholder input is recognized.

PHILOSOPHY OF FIRES

- ▶ When we went to the holistic science of conservation biology, it centers on the assumption that nature knows best.
- ▶ The manner used today to detect fires is only contributing to more and larger fires. This happened much less frequently in the days of the fire lookouts.

POLLUTION

- ▶ Include carbon emissions as a part of the environmental analysis of forest management planning. Industrialized fuel reductions will probably do more harm than good and should be avoided. Non-motorized recreation should be encouraged and given priority in planning. There are several state programs that use off road gas tax monies to accommodate motorized recreation. These programs and funds should be redirected into planning and implementing recreational activities that leave a minimum carbon footprint.
- ▶ Local groups and state groups should sue the state and feds to stop large fire let it burn due to the increased carbon dioxide in the air. The federal government must comply with restricting the amounts of carbon dioxide in the air. Other groups fight and sue the federal government to stop logging and thinning as well as other activities, why do not other groups sue to stop the federal government from pollution as well as dumping large amounts of carbon dioxide in the air. There needs to be a lawsuit or suits by groups or the state to stop let it burn policies.
- ▶ If the fed government does not suppress the fires then they need to pay pollution fines as well as costs for smoke related sickness.
- ▶ There needs to be a study on sickness for air pollution during fire seasons. The feds must pay for those costs related to sickness including those who have no insurance.

- ▶ The Forest Service does not consider air pollution and its effects when allowing fires to burn.
- ▶ The Forest Service does not consider the injury to people, wild animals, etc when deciding to allow fires to burn.
- ▶ The Forest Service has decided that allowing large fires to burn for the good of the forests is more important than the damage it does to people breathing the polluted air.
- ▶ Continued use of fire and tolerance of "let burn" policies in light of the recent race to control carbon emissions, certainly raises the question of double standards being observed in setting state fire policy. Information provided from a California pollution study reported amazing statistics relative to catastrophic fire emissions. Information collected from a model developed by the California Air Resource Board Dept. to estimate emissions from forest fires indicated burning one acre of coniferous forest emits on average nine tons of carbon dioxide, 0.6 tons of hydrocarbon particulates, 0.25 tons of nitrous oxide. It was calculated that it would take 1040 new cars driving 1250 miles to equal a one-acre fire. In 2003 about 500,000 acres burned in Flathead County. From that model we can only guess at the volume of contaminants which were, and still are being released.
- ▶ Prescribed burns may only be allowed by the local county boards.
- ▶ Air quality restrictions need to be relaxed to provide for more burning of range and forestlands. This is particularly true east of the continental divide where there is increasing forest encroachment on grasslands.
- ▶ It is ironic that private individuals can not burn fires during certain periods of the year or even on certain days but the feds can let fires burn or start them during those same times.

MEDICAL

- ▶ Type I and type II teams provide emergency medical coverage for their personnel differently. This ranges from having a full paramedic transport ambulance assigned to the base camp or spike camp to having some EMT's with no ambulance. For example the Southwest teams always insist on having paramedics and an ambulance contracted and assigned to the team. The Northern Rocky teams seem to be comfortable with EMTs or some paramedics, but none want to have an ambulance contracted. They seem to be content on dialing 911. Having advance life support medical transport coverage should be one of the highest priorities when it comes to the type of work our firefighters have to perform. Our statistics tell us that most of the firefighters who die in the line of duty die from heart related events.

- ▶ Every organization in the country accepts a licensed medical doctor's certificate of health, but the agency requires the "backpack test".
- ▶ A fireman should be able to pass a doctor's health examination to certify that they are physically fit to work fires. The agency should accept this examination and stop killing firemen.

AVIATION

- ▶ Put more resources in airplanes, helicopters and the related support services needed to allow them to be deployed at the earliest evidence of a fires start, especially in areas of denser populations.
- ▶ The state must contract ahead for air support for a fire season so they are not looking for assistance during fire season. In the long run it will be cheaper to contract for a part of a fire season, regardless of the number of fires.
- ▶ We need the title to our state helicopters as soon as possible.

PUBLIC AWARENESS

- ▶ Need to continually make the public aware of cost of fires, fire suppression, and breakdown of costs. It may slow down this percentage of preventable fires if the investigating team would update the public on reasons for fire, costs of fire suppression, and what fines and or criminal action was taken against the persons responsible for the fires.
- ▶ The public, landowners, homeowners must be so educated on their responsibilities to their homes, fires and property that it is ingrained in them what and how to protect their property, expectations of what firefighters will do to protect their homes on small and major fires, what to do in emergencies when fires comes. Too often the public meetings are more song and dance.
- ▶ The state/feds/local officials need to understand that the public wants to be heard at public meetings. Too often it is top down. It should be what do people really need to know instead of dog and pony shows.

WOOD FIBER FOR RENEWABLE RESOURCES

- ▶ There is the need to use the small timbers for wood fiber for energy.
- ▶ Encourage use of timbers for energy and biomass.

LEGISLATIVE AUDITS

- ▶ The legislative audit recommendations for promoting proper forest practices and prioritizing forest fuels reduction projects must be implemented. The question for the department is: Were the recommendations all implemented? The college of forest resources website gives facts and figures which prove that utilization of the excess fuel waste is a far most cost effective way to go in the long term than what have been acceptable practices.
- ▶ The wildland fire administration audit from 2004; were all the recommendations implemented?

STATE FIRE POLICY

- ▶ The state should explain if they follow the state fire policy provided by the legislature or where the gaps are for following the policy. (76-13-104, MCA)