

January 15, 2008

Leanne Heisel, Lead Staff
Legislative Services Division
P.O. Box 201706
Helena, Montana 59620-1706
E-mail: lheisel@mt.gov

RE: Response to 12/14/07 request for specific recommendations
To Fire Suppression in Montana.

I have worked in Structure and Wildland Fire Suppression all over the United States since 1972. I hold the title of Fire Chief and am Incident Commander qualified. I have thousands of hours logged on fire suppression assignments good and bad. I can only hope that this contribution will be considered, reviewed, and finally acted upon. I will make myself available to assist in this effort, but I do not give permission to use my name or disclose my personnel information for obvious reasons.

*Mark Story / Fire Chief
Bighorn Fire Company
50 Quinn Creek Road
Bozeman, Montana 59715
storymjsjc@aol.com*

1. Specific Recommendations on the (4) listed items:

A. Firefighting operations and management policies which affect their success on tribal, state, federal, and private lands.

My first and foremost recommendation is 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.

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Severity Contracts provide trained personnel who size-up the incident & 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. **which is what is happening now.**

My second recommendation is to form Type 2, Type 3, and Type 4 teams made up specifically of Contract Firefighters. Place an affable, experienced agency man who wants to be there and is not biased as the Contract Officer. Administer this just like you would any other contract as all the rules are already written in the **NWCG Fireline Handbook**. Each contractor would respond with their own insurance, equipment, trained personnel, support, resources, whatever is needed. You could start with a few teams to work with BLM, BIA, DNRC, FOREST SERVICE. Appoint unbiased administrators to perform evaluations after each assignment and in turn conduct meetings with the contractor and overhead throughout the incident. This will prevent misuse of resources and insure the success of the program. After the first year collect all the evaluations and create a committee made up of unbiased and qualified firefighters and administrators who are involved in the program to fine tune the contract and come up with a protocol for future teams. This would eliminate the waste and abuse of the system by providing an actual bid schedule that reflects what work is required and a competitive bidding system to complete the work on time without misuse of resources. In short, this would require the current fire fighting agencies to use qualified contractors for wildfire suppression and not volunteers or agency crews which don't work.

Finally, 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 lays,

engines, and water tenders. Now we aren't allowed to attack the fire with anything but helicopters and that is where all the money is going. Simple organization by qualified people will fix this problem. It has been done before it is just not being done now.

B. The efficient use of fire suppression resources, (i.e. equipment and firefighters).

By organizing type 2,3,&4 contract teams you eliminate the liability of unprepared personnel and un-experienced firefighters. The agency would be given the latitude to dispatch a pre-approved crew at a fixed cost and give them the opportunity to suppress the fire without having to wait for resources to arrive from other states while the fire grows to exorbitant proportions. Night shifts would be the rule rather than the exception and state-of-the-art equipment and supplies would be on-site and in working condition rather than lost in a cache somewhere or not operational when it finally does arrive.

Fire suppression crews and equipment are only as good as their leaders and you don't have enough people who know how to safely use engines, tenders, and firefighters on an incident when the whole state is on fire. If a program were implemented with contract fireman and they were used when needed soon you would have a viable resource pool to draw from.

Montana does little **prescribed fire** as part of their fuels reduction. There is a great need for this and contractors could get this done. Taxes would be paid, communities supported, and good jobs would be provided.

C. Impacts of operations on Private Land.

&

The effective use of Private Resources to fight fires.

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, 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.

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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. Again, the proper administration of a simple contract would insure that funds were spent wisely and the work was completed according to agency specifications.

D. How do the State and Federal Forest Management Policies contribute to:

1. The increased number of wildfires.

all Fuels reduction programs are not being done in a timely manner if at so it is easier to wait for a wildfire then monitor it 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 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.

2. Safety risk to firefighters.

Currently, Fire Command officers can be held personally liable for mistakes made on an incident. Lawsuits have been filed and because this has occurred many qualified fire people have retired or decided not to take the chance. Another incentive for no longer attending wildfires is the agencies "Back Pack Test", which has killed numerous fireman. Therefore, poor and in-experienced people are placed in command and firefighters are injured or killed. Safety is a guideline not a requirement contrary to what you are told.

3. Effectiveness of Fire Suppression Efforts.

Policy does not allow the timely removal of dead timber and vegetation, (Fuels Reduction Projects). No efforts are made to provide even the smallest degree of preparation in fire prone areas such as fire breaks and clearings in high fire urban areas. Roads are not maintained or bridges constructed to allow access of fire apparatus and resources.

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3. Cont....

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 who 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.

In the late 1990's thru today, FEMA has supported a program which supplied grant money for volunteer and paid public Fire Departments to build firehalls, buy new apparatus, buy new equipment, and attend training programs. This was obviously done to improve our fire capabilities on the local level to fight these catastrophic fires and deal with terrorism. What has happened is the volunteers cannot devote the time required to be good fireman and still be able to make a living and be with their families. So volunteer departments are losing their members and inexperienced people are being placed in critical overhead positions. I want to point out that the State of Montana (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. Volunteer fireman are there to support their community not to stay for an extended amount of time while their business and real livelihood is being neglected. This problem and the lack of qualified overhead is why suppression efforts in the past and future operations will fail.

2. What do you think will happen in this state with regard to firefighting and suppression in the next ten years if there are no changes in policy, practice, or funding?

Volunteer companies will support state and federal agencies in fire suppression only if they feel like it. Management will consist of inexperienced agency wanabees who have attended a crash course in fire suppression and if they were lucky worked a few prescribed burns, but have no **Structure, Wildland, or Haz-Mat** training. Safety standards will continue to falter as well as qualified firefighter principles. 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 and then make the tax payer recoup the loss.

3. What can be done by: Agencies, local governments, homeowners, and private industry by next Spring/Early Summer to prepare for fire season?

Agencies: 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 fire wise, (i.e. fuels reduction, construction to prevent fire spread, develop water sources, irrigation systems surrounding buildings, etc.) Center efforts toward contract work rather than attempt to handle everything in-house.

Local Governments: Restructure Policies and S.O.P.'s (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, appoint affable personnel who want to be there and make sure they are experienced in what they are required to accomplish. Encourage training and awareness so county departments do not accept assignments that are beyond their scope of experience.

Homeowners: 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 policies and concentrate on what role your Disaster and Emergency Services is playing in this and if your county's DES officer is qualified to make the required decisions..

Private Industry: Provide a variety of equipment and personnel to offer the best technology and service available. Stress on safety, training, and professional integrity towards the agency's fire suppression requests.

4. If you provide contract services please provide us with specific suggestions that may improve the contracting process.

The current requirements are unrealistic and centered at discouraging the Private Industry's participation. Be advised that agency and volunteer departments are not required to meet the same standards, but they continue to work fires each year some examples are:

D.O.T. registration and certification of all vehicles.

The Department of Transportation requires that all commercial haulers that transport freight for profit over the public road system be registered. A Commercial Drivers License is required for all vehicles with a gross vehicle weight over 26,000 lbs. endorsements are also required for air brakes, hazmat, doubles & triples, passenger bus, etc.

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

Weight restrictions for engines.

The old standard for the engines was changed to make the use of all currently approved engines illegal even though they meet weight restrictions to legally haul according to the D.O.T.

For example the minimum allowable gallons that a Type 6 Wildland Engine was changed from 150 gallons to 250 gallons then the hose reel was made mandatory and it had to have 1" hard rubber hose on it. This made the use of a 1-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.

This change cost Montana over 400 contract engine companys.

Private Contract Services are not always used.

Many contractors have built engines, trained their staff, 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 in their own 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 inquiries 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 who 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.

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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 what his resources are capable of doing and working on prescribed 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 tax payer 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 contract engine companies.

Every organization in the country accepts a Licensed Medical Doctor's Certification 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 fireman.

*Note

There are too many issues that answer the questions you pose in your request for comment. Your committee needs to appoint an investigation team which will investigate the world of fire in Montana before, during, and after a fire suppression incident. I haven't scratched the surface in this small report, but I know that the majority of your trouble is within your fire administration people. Please don't blame the firefighters and workers who are just trying to do the right thing.

Heisel, Leanne

From: Allison Kolbe [akolbe@fs.fed.us]
Sent: Friday, January 25, 2008 11:48 AM
To: Heisel, Leanne
Subject: comments for fire suppression committee

Attachments: Allison's comments legislative.doc



Allison's comments
legislative...

Please find my comments for the fire suppression committee attached.

(See attached file: Allison's comments legislative.doc)

Allison Kolbe
Fire Prevention Tech
Lolo NF, Seeley Lake RD
406-677-3908

January 25, 2008

Dear Fire Suppression Interim Committee:

I feel compelled to comment regarding wildland urban interface (WUI) issues in Montana.

As you are undoubtedly aware, Plum Creek Real Estate Investment Trust is selling their timberlands for real estate development. As a REIT, Plum Creek pays no corporate income taxes to our state. As these lands become developed, our WUI problems increase dramatically.

We in the fire fighting business have heard your concerns about the inability to afford these huge firefighting bills. This problem will be exacerbated greatly as Plum Creek continues to sell timberlands for real estate. The cost of fighting fire in the WUI is many times the cost of suppressing fire when structures are not present. This last summer on our Seeley Lake Ranger District we had the Conger Creek Fire in and near wilderness which cost about \$40 per acre at the same time the Jocko Lakes fire was threatening the community of Seeley Lake which cost about \$1000 per acre. The fires that are the most expensive are those that involve values at risk.

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.

I am sure that you will receive many comments regarding many different issues related to how we can save money fighting fire. I think that it would be a mistake, however, to ignore this future threat of great increases to the costs of firefighting due to the development of former timberlands.

Plum Creek unfortunately has the right to sell their land. However, perhaps some legislation could be introduced to hold them accountable for the increased burden of future firefighting costs they are laying on the public.

Thank you for taking comments.

Sincerely,
Allison Kolbe

Allison Kolbe
PO Box 1288
Seeley Lake, MT 59868

Heisel, Leanne

From: Chuck and Pam Rein [anchor@ttc-cmc.net]
Sent: Saturday, January 26, 2008 10:17 AM
To: Heisel, Leanne
Subject: Re: Wildfire Management

Leanne,

Thank you for the reply. I have been asked by the Big Timber Volunteer Fire Department and the Crazy Mountain Stockgrowers to have their organizations attached to the comments I sent to you yesterday. To verify you may contact Mark Stephens - Fire Cheif - 932-4675 and Roger Hammersmark - President CMSGA - 932-5340.

Thank you,
 Chuck Rein

----- Original Message -----

From: Heisel, Leanne
To: 'Chuck and Pam Rein'
Sent: Thursday, January 24, 2008 11:24 AM
Subject: RE: Wildfire Management

Mr. Rein,

Thank you for your comments -- I will make sure the committee receives your information, and yes, the committee will certainly be accepting public comment at its meetings across the state. The Feb. 1 deadline for written or emailed comments is an effort to assemble a list of options for the committee to consider before its field hearings, as well as to give people who comment at those hearings something to comment on.

Thank you again.

Leanne

Leanne Heisel
 Legislative Research Analyst
 Montana Legislative Services Division
 Room 111-A, State Capitol
 406-444-3593
 lheisel@mt.gov

From: Chuck and Pam Rein [mailto:anchor@ttc-cmc.net]
Sent: Thursday, January 24, 2008 10:43 AM
To: Heisel, Leanne
Subject: Wildfire Management

Leanne,

I have been on a volunteer rural fire crew for 30 years. The management of wildfire has changed dramatically during that time. We have gone from everyone pitching in to extinguish the blaze to a bureaucratic, military like

structure that is top heavy with management and loaded with contract crews that are not motivated to put the fire out and go home.

After discussion with the local volunteer fire department chief, his assistants, and local ranchers I would like to submit the following comments.

- 1) Include local volunteer fire chiefs or assistant chiefs on Type I and Type II management teams.
(Type III management teams use these resources effectively)
- 2) On Type I and Type II fires 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.

These are just two ideas. I hope the committee will consider additional ideas after February 1 as they hold meetings across the state. In addition I would like to request a meeting be held Big Timber or Columbus as both communities have been heavily impacted by wildfire the past two years.

My thanks to the committee members and staff for addressing this very important issue.

Chuck Rein
198 Rein Lane
Big Timber, MT 59011

Heisel, Leanne

From: Don J. [donj@lewistown.net]
Sent: Sunday, January 27, 2008 8:45 AM
To: Heisel, Leanne
Subject: Fire Suppression
Attachments: don-fire suppression.wps

Please see attached comments on fire suppression. Thanks, Don Jenni

FOREST FIRE SUPPRESSION

My comment is on private lands when the fire is managed by county, state or federal agencies. The private landowner needs to be informed at the early stages of the fire as to what is expected of him as to paying for any of the resources used, particularly private resources. If the private landowner is expected to pay for any of the resources, he should be involved in the management of the fire.

The private landowners need the assistance of the state and federal agencies in fighting large fires, this assistance should be available as early as possible to prevent the fires from getting so large.

Don Jenni
568 Ringneck Lane
Lewistown, MT 59457
donj@lewistown.net

January 28, 2008

Attn: Leanne Heisel
Re: Fire Comments

Our property burned in a grass/forest fire in 2005. I would like to make some comments and observations about better ways to use our resources.

First allow people to volunteer to help. In our case the fire started next to a road and several people stopped to offer our local volunteer fire fighters assistance. They were turned away, maybe this is a liability issue. If so perhaps classes could be offered during the winter months to teach people what to do if they see a fire start.. Something like the classes the county extension agent gives to educate landowners about weeds. Include information about personal safety and things people can do to keep their property fire safe. Offer some kind of identification card so people can prove they are qualified to help. In our case we had some friends that wanted to come to our property during the fire and help, law enforcement had the highway closed and would not allow them through.

Second station groups of tribal fire fighters in the rural communities, that only have volunteer fire departments, during high fire danger. Quick response is so important. We had a bus load of tribal fire fighters that showed up on our property the day after the fire. They worked on some smoking stumps, which was okay, but not necessary. Imagine our surprise when on the second day after the fire two bus loads of tribal fire fighters arrived. We were made out to be the bad guys when we "denied access", but there was nothing for them to do here.

Third 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 couldn't come back because all the fuels were already burned.

Fourth stop making back burns. When things are very dry we need less fire not more.

Fifth pay fire fighters a bonus if the fire is put out in the first 24 hours. Like all government programs this one is being abused. We had people sitting in the woods around here two weeks after the fire was completely out. I'm not sure what their job was but they were playing cards. Also volunteers from other communities that responded to our fire were assigned "structure protection." Apparently they took these instructions literally because they sat in their trucks and waited for the fire to reach the houses. They also sat in their trucks and watched the local landowners work to put the grass fire out. Luckily no structures were lost in our fire, but when I had time to look up from fighting the fire myself, I saw a pumper truck that sat at the end of our road for hours and never moved.

Sixth do some ad campaigns that not only stress that homeowners need defensible space around their homes but also that they need to be set up to do the defending. The thing that was the hardest part of our whole personal fire experience was that we were all alone most of the time. We had some help from the air with retardant drops, but apparently it was to dangerous for anybody else.

Lastly, why investigate? I don't know how many people have this investigating job, but its not necessary. In our case the person that started the fire was identified and he was excused of any fault. In fact it was deemed an accident, what isn't? He even had insurance and apparently they were also excused of any liability because the law in Montana is written to mean that as long as you report a fire and do not start it and run away you are not responsible for any damages.

As long as there are big rewards, good paying jobs, when a fire starts. And no punishment, not even a fine, we are in big trouble. I don't want to see people get killed fighting fires, but it is a dangerous job. If we can't put people in front of the fires we might as well leave the ground troops at home and just fight the fire from the air.

You have a very hard job ahead of you trying to figure out how to save money fighting fires. Our forests are a mess, dead trees everywhere, and when the loggers get done they leave an even bigger mess. It would cost more than the trees are worth to manage the forests properly, so nature takes care of it with a fire.

I am looking forward to your community meetings. I hope some positive improvements can be put into place from all the comments you are receiving.

Heisel, Leanne

From: Kent, Howard
Sent: Monday, January 28, 2008 12:00 PM
To: Heisel, Leanne
Subject: Comments to Fire Suppression Committee
Attachments: Fire Suppression Committee members.doc

Thank you for reviewing my comments.

Howard J. Kent
Unit Fire Supervisor
Clearwater State Forest
MT-DNRC
406-244-5857

1/28/2008

Dear Fire Suppression Committee members,

I would like to thank you in advance for taking the time to read my comments.

I am the Unit Fire Supervisor (UFS) for the Clearwater Unit of the Montana Department of Natural Resources and Conservation (DNRC). I have worked for the DNRC since the summer of 1992. In the last sixteen years I have seen the costs of suppressing wildfires sky-rocket to a level that appears to be, in my opinion, verging on out of control. Based on my experience and personal research there are some things that I feel need to be brought to the attention of the Fire Suppression Committee and to our Legislature.

One factor driving these excessive costs is the "Best Value" system that the DNRC is mandated to use. Is it truly a "Best Value" for the taxpayers who ultimately pay for this equipment and personnel on wildfires? For large project fires the "Best Value" system may be a cost effective tool, however, under Initial Attack and Severity Operations for the DNRC, I have found that usually just the opposite is true. During the 2007 fire season we were authorized to hire six contract "Best Value" type 6 engines to assist us with our initial attack operations. One of these "Best Value" engine was hired under Severity. Even though they were expensive, most of them did a good job working for us. On the other hand, the "Best Value" engine that we had to use for Severity in 2006 was extremely costly and failed to meet our needs. But, because there was no one left on the "Best Value" list that year, we were unable to replace the ineffective resource with another, to meet our fire suppression objectives.

After the 2007 fire season was complete, I took the opportunity to sit down and work the numbers, to see how much of a "Best Value" the taxpayers were getting. What I discovered might shock most Montanans. The "Best Value" engine that we had at the Clearwater Unit under Severity during the 2007 fire season was paid approximately \$108,800 for sixty-four days of work. For a comparison, I estimated how many years the State could staff a DNRC type 6 engine for that same amount of money. I found that it costs the taxpayers \$41,548.00 to build a brand new type 6 wildland fire engine, which we would be able to utilize for 12 fire seasons. An Engine Boss and a Firefighter are considered an "Engine Crew" per one type 6 wildland fire engine. A DNRC Engine Boss makes approximately \$12.00/hour, and a Firefighter makes approximately \$10.00/hour. For a normal fire season of sixty-nine days of work, one DNRC Engine Boss and one Firefighter plus 25% for benefits, costs the taxpayer approximately \$15,180.00. On those wages and the cost of buying and building a new type 6 wildland fire engine, the State of Montana could fully operate that engine for 4½ summers on what we paid the "Best Value" engine for just sixty-four days worth of work. In addition, we would still be able to use that engine for another 7½ years of firefighting.

Every summer we get to a place where the fire conditions warrant additional Initial Attack "Severity" resources, at which time we are required to hire "Best Value" engines. If we were allowed to buy, build, and staff additional type 6 wildland fire engines with state employees, we would ultimately be saving the taxpayers thousands and thousands of dollars each summer. To go along with that, as it stands right now, we cannot use contracted "Best Value" engine personnel to serve as Incident Commanders on a fire, even if they are qualified. They are not even allowed to operate chainsaws to help remove burnable material away from a fire. During Initial and Extended Attack on wildland fires, this is what we require of our state employees. If the legislature would approve the funding and FTE for more DNRC engines and firefighters, we would be saving the taxpayers a lot of money while providing additional well trained and qualified personnel to manage the many complex wildfire incidents that we experience every year. I would ask that you seriously consider these facts.

Another thing about the "Best Value" system that makes it incredibly challenging for UFS, such as myself, to retain our DNRC firefighters is the wage comparison between contractors and state employees. The taxpayers have invested a lot of money into the training of our DNRC firefighters. As I experienced this past summer, and I'm sure others have dealt with similar

issues, our Engine Bosses and Firefighters are not blind to what is happening. Our DNRC firefighters talk with the contract "Best Value" Engine Bosses and Firefighters and they compare wage amounts. In most cases our DNRC Engine Crews have considerably more training and experience than the "Best Value" Engine Crews. However, when our employees find out that the "Best Value" Engine Bosses and Firefighters are making between \$400-\$500 each per day, compared to their \$80-\$96 per day, it doesn't take them long to figure out where they want to be. The contractors are very eager to hire our employee's right out from under us and can offer them a substantial wage increase due to their training and experience that the taxpayers have helped to provide. For example, this past summer one of my Senior Engine Bosses who had worked for us for 6 years, ended his employment a couple of weeks early and returned a few days later as the Engine Boss on the contract "Best Value" type 6 engine that we had hired. I can tell you from experience that trying to hire firefighters during the most active portion of fire season is difficult, if not impossible. We were not able to find anyone to take his place when he left, so we were ultimately short one critically needed type 6 fire engine. He explained that he needed to make more money for a few weeks before the end of the summer. I remember being pretty upset at the time, but I could also see his rationale. The contract Engine Bosses and Firefighters are earning more than twice the amount of our high end UFS even with overtime included. Considering their level of responsibility, this doesn't seem quite right as UFS are not only responsible for supervising these "Best Value" resources, but also taking on all the other fire related responsibilities within the unit. This is going to continue to be an issue as long as the market value for state employees stays low and the "Best Value" system continues to increase and become more broadly accepted.

I agree that there should be private contractors to help do the work that needs to be accomplished during the fire season and that they be allowed an opportunity to get a slice of the pie. But, due to what I have witnessed for several years now, I do not agree with the claim that private contractors can do the job better and more cost efficiently than the DNRC. I, personally, am not a big fan of "Growing Government", but in this case the dollar numbers do not lie. We would only be "growing" during a small portion of the year when we need extra help and expertise, as our firefighting forces are only three month seasonal positions (June-August). My recommendations are to increase the equipment and seasonal staffing of our own DNRC Initial Attack Engine forces, because we can absolutely do the job better and for less money. The final recommendation that I would like to present is to somehow come up with a better way, other than the high priced "Best Value" system, to obtain contract firefighting resources, for our Initial Attack use.

Thank you for taking the time to consider these comments. Please feel free to contact me for any additional information or clarification.

Sincerely,
Howard J. Kent
Unit Fire Supervisor
Clearwater State Forest
MT - DNRC
406-244-5857

January 30, 2008

Fire Suppression Committee
C/O Leanne Heisel
Legislative Services Division
PO Box 201706
Helena, MT 59620-1706

Dear Committee Members,

Please accept the following comments and suggestions regarding fire suppression activities on State, Federal and Private Lands in the State of Montana.

- 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, supervisory and support roles such as dozer bosses, support crews such as lowboys and fuel

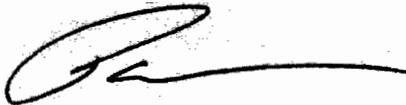
service as well as qualified line officers to cooperate with the fire operations specialist. Rather than requesting individual pieces of equipment like we do now, you could request a "mechanical fire line squad" that would have a feller buncher, skidder, dozer, lowboys, dozer bosses and other supervisory 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 specialist 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.
- The current trend is to blame the skyrocketing cost of fire suppression on residential construction in the wildland urban interface. I think we may be 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 these 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 value that deserve 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!
- 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 it's protection. Building cooperatives with existing outreach organizations such as the Montana Tree Farm System, Montana Forest Stewardship program, DNRC

service 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. As a forest management professional, I have observed starkly different attitudes to fire and fire suppression in our state and federal agencies. I have to applaud the State DNRC for its aggressive initial attack, early detection and overall cooperative outlook to fire suppression. I think if we could get similar attitudes in all agencies with fire suppression responsibilities 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.

Thank you for the opportunity to participate in the process. Please feel free to contact me with any questions or to discuss these issues further



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