

Heisel, Leanne

From: Matthew Koehler [koehler@wildrockies.org]
Sent: Friday, February 01, 2008 12:25 PM
To: Heisel, Leanne
Subject: WildWest comments to Fire Suppression Commi
Attachments: WildWest_Fire_Committee_Comments.doc

February 1, 2008

Fire Suppression Committee
c/o Leanne Heisel
Legislative Services Division
P.O. Box 201706;
Helena, Montana 59620-1706.
lheisel@mt.gov

TRANSMITTED VIA EMAIL. PLEASE ACKNOWLEDGE RECEIPT

Dear Fire Suppression Committee,

The WildWest Institute is non-profit, grassroots environmental organization based in Missoula with nearly 1,000 members. Our mission is to protect and restore forests, wildlands, watersheds and wildlife in the Northern Rockies.

We help craft positive solutions that promote sustainability in our communities through jobs restoring naturally functioning ecosystems and protecting communities from wildfire. We also ensure that the government follows the law and best science when managing our public forests by fully participating in the public decision process and through on-the-ground monitoring.

Over the last few years, the WildWest Institute - working in connection with the research and scientific community - has developed some basic principles related to protecting homes and communities from wildfire, as well as ensuring firefighter safety. We would request that the Fire Suppression Committee consider these principles as you move forward.

Our approach is based on the principle of fiscal responsibility by ensuring that fuel reduction efforts are targeted where they do the most good in terms of protecting homes and lives. It is our hope that the U.S. Forest Service, State of Montana DNRC and county and local governments utilize these principles when moving forward and carrying out this important work. We also would like the Fire Suppression Committee to consider these principles as you move forward

Focus on the Home Ignition Zone (HIZ) to Protect Homes and Lives

The chances of a home igniting during a wildfire is determined almost entirely on what happens within a hundred yards of the home. The landscaping within the Home Ignition Zone (within 40 meters of the home) and the building design and materials determine whether or not a home will catch fire. Home protection is a local endeavor. It is what is done on private property immediately around the home that really counts.

Therefore, the Forest Service, State DNRC and county and local governments should work with homeowners, neighborhood associations, developers and other interested parties on cooperative

2/1/2008

education and mitigation efforts to ensure that all homes and neighborhoods in Montana have this important HIZ work completed as soon as possible. One way to accomplish this would be through FireSafe Montana.

For more information about the Home Ignition Zone, please see:

Cohen, Jack 1999a. Reducing the Wildland Fire Threat to Homes: Where and How Much? Pp. 189-195 In Proceedings of the symposium on fire economics, planning, and policy: bottom lines. April 5-9, 1999, San Diego, CA. USDA Forest Service Gen. Tech. Rep. PSW-GTR-173.

Cohen, Jack D., 2000a. Preventing Disaster: Home Ignitability in the Wildland-Urban Interface. Journal of Forestry 98(3): 15-21. March 2000.

Cohen, Jack D., 2000b. What is the Wildland Fire Threat to Homes? Presented as the Thompson Memorial Lecture, April 10, 2000 School of Forestry, Northern Arizona University, Flagstaff, AZ. Jack D. Cohen, U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory, P.O. Box 8089, Missoula, MT 59807 Tel: 406-329-4821, email: jcohen@fs.fed.us

Cohen, Jack D., 2001. Wildland-Urban Fire-A Different Approach. In proceedings of the firefighter safety summit, Nov. 6-8, 2001, Missoula, MT. International Association of Wildland Fire.

Prioritize treating high-risk areas within the Community Protection Zone (within 400 meters, or 1/4 mile, of homes and structures): The Community Protection Zone is an area that overlaps and extends from the Home Ignition Zone to approximately $\frac{1}{4}$ mile from homes and structures. Fuel reduction efforts within the Community Protection Zone, when combined with HIZ work, can provide safer, cheaper and more effective opportunities for firefighters to protect other flammable features of a community.

This means treating both National Forest, State Forest and non-federal lands within the Community Protection Zone, especially when these CPZs have more than 250 people per square mile. For the most part, the treatments should focus on removing finer fuels like brush and small trees less than 8 inches in diameter, retain larger fire-resistant trees, prune lower limbs and, where possible, reduce surface fuels with prescribed burning.

For more information on the Community Protection Zone, please see: *Nowicki, Brian, 2002. The Community Protection Zone: Defending Houses and Communities from the Threat of Forest Fire. Center for Biological Diversity, August 2002.*

It should also be clearly stated, that it makes little sense to us for the Forest Service and logging industry to pursue supposed "fuel reduction" projects deep in the backcountry, many miles away from the nearest home that are certain to cause controversy, all the while leaving the Home Ignition Zone and Community Protection Zone virtually untreated.

Again, It is our hope that the U.S. Forest Service, State of Montana DNRC and county and local governments, as well as the Fire Suppression Committee, utilize these principles when moving forward and carrying out this important work.

If you have any questions, please feel free to contact me at 406.542.7343.
Sincerely,

Matthew Koehler

2/1/2008

Heisel, Leanne

From: John Jump Trucking, Inc. [jumpshop@centurytel.net]
Sent: Friday, February 01, 2008 5:40 PM
To: Heisel, Leanne
Subject: Wildfire Suppression Comments
Importance: High

Dear Leanne Heisel,

My name is Kevin Jump. I have been in the timber industry most of my fifty years. I've enjoyed this work and the opportunities it brings to work, fish, hunt, snowmobile, ATV, and camp in the forests. To me, and a great majority of others, these things and many others can only be done in a green, healthy forest.

After being involved in firefighting efforts since the late 1970's, I've seen a steady erosion of effectiveness and willingness of the Forest Service by lack of prompt initial attack and putting the fires out by any and all means necessary, which was so effective prior to changes seen in the mid 1980's. As I, and others, see it, the biggest problem is the changes in policy from what used to be firefighting to fire management which ends up being nothing more than a "let it burn" policy unless the fires go towards homes. That costs millions of tax dollars that could be better used to make the forest healthy again and create more jobs, better jobs, and recreation opportunities. This was the intention of creating the Forest Reserves and National Forests of today.

My feeling is that if these policies are not changed back to what used to be the goal of putting the fires out and treat these fires as emergencies, then we will not have a green, healthy forest with old growth of any size left in the U.S. Don't get me wrong, I am very aware of the need for low intensity ground fire in the forest. But common sense says that it should only be done under perfect weather conditions and only if the timber stand has received fuels reduction treatment that has totally removed all useable roundwood and woody biomass that is not left standing. To me, and others both public and professional people in the agencies (ex. Forest Service and DNRC), it is plain to see that many of these fires are allowed to burn to large sizes to treat them in this way for fuels reduction in spite of the tremendous loss of natural resources and the effect to animals and humans from degradation to air and water quality that contributes to climate change.

I wanted to also add that DNRC and Tribal fire teams don't get enough credit for their efforts in being so good at initial attack and firefighting. Each year they put out thousands of fires because they have the direction and willingness to put them out. The public never hears about this.

The way I see it, the first thing that should be done is to ramp up special teams similar to what DNRC does who are highly trained on initial attack engines and are on steady patrols of all ranger districts, not just sitting at the forest offices. Second is to have a small helicopter staged at each ranger district and require that on initial attack that the helicopter goes also. And third would be to have initial attack dozer teams and dozer/lowboy combinations at each ranger station. These three things would be something that can be done by the next fire season. It seems like a lot of potential money to do this, but if these fires can be put out at a small size instead of growing to huge catastrophic sizes, it will save millions and reduce exposure of fire to the firefighters and the public.

Another increasing problem is the lack of experienced leadership (ex. dozer bosses, equipment specialists). They need to look to the private sector for complete teams; dozer bosses, skidgers, dozers, lowboys, water trucks, and private sector equipment specialists who know what the equipment is and its capabilities. They also need to recruit and support these teams that are familiar with area forest types, roads, and terrain.

With regards to sign up and contracting, we haven't had a lot of trouble with that until they moved our local contracting office from Flathead to Missoula. I have heard of problems with that from many contractors.

It is clear to see that the biggest effecting change that needs to happen is with policy. The most important is to put more emphasis on fire prevention instead of fire suppression, which is forest management and fuels reduction that can put money back in the system to help pay for future management and fire suppression.

2/5/2008

Another change is in hours and days at which to fight fires. There simply aren't enough experienced people that know the local forests to send them home every fourteen days and then get someone that doesn't. I've seen and heard many times where there have been fires almost lined or put out and then there is a change in management teams and the transition time or management ideas have allowed the fire to get away, sometimes from teams that are not familiar with our timber types, topography, and weather patterns. Other policies also limit what time of the day or night to be fighting the fire. In the past, when we were effective, we fought the fire direct when the fire was down, like daylight to 11 a.m. or putting in dozer lines at night when it's cooler and no wind. There is no excuse to not be using all of these techniques. We all understand that safety is key. But with firefighting, deep sea fishing, and logging, all these have inherent risks. To be effective and efficient we have to return to techniques that are proven to work. If the Forest Service is not willing to make these changes in order to save our forests, people, and environment, then they need to step out of the way and dispatch contracts and support with camp to the private sector that has the knowledge, equipment, and the "can do" willingness to get the job done.

Thank you for the opportunity to comment.

Sincerely,

Kevin Jump

Heisel, Leanne

From: fbjorklund@juno.com
Sent: Friday, February 01, 2008 12:17 AM
To: Heisel, Leanne
Cc: fbjorklund@juno.com
Subject: Fire Suppression Comment

Fire suppression committee members:

Thank you for allowing me to participate in your call for comments.

Fred Bjorklund
Anaconda, MT
563-5062

1. Re: fire fighting operations in Montana, including operations on tribal land and private land, by the state and federal governments and the management policies affecting the success of those operations

This is actually a fire budget issue. I do not believe that federal lands should have a "let-burn" policy/budget. I do realize that over the years an aggressive fire suppression policy has led to a buildup of forest fuels. My remedy would be to utilize those merchantable forest resources, such as hog fuel, municipal heating fuels, saw logs and pole stock. The prescriptive burning could begin after the forest resources have been salvaged or utilized.

When federal lands are adjacent to state lands, there should be a mutual agreement to aggressively fight fire before it reaches private lands and state protection. There should not be a federal "open budget" policy for fire fighting up to a line, and, when the fire crosses this imaginary line, it moves from the federal to the state fire budget. The state is now forced to accept whatever "mess" the federal firefighters have left at the line, along with their extravagant fire fighting operation. This "mess" is complicated by challenges such as structure protection. The fire does not have the ability to stop at the line because the funding changes. An imaginary line should not be used to differentiate between federal and state budgets. A possible remedy for this situation would be to create a wider "buffer zone" between the federal and state lands that are involved.

2. Re: the efficient use of fire suppression resources, including equipment and firefighters

With this issue, firefighter safety is the top priority. Fires don't burn from 8:00 AM to 5:00 PM. Firefighters and equipment could and should be ready to work on the line at daybreak, which could easily be 5:00 AM in July. This would eliminate the poor-visibility issue that we often hear about at incident briefings. This is the coolest time of the day, and the best time to aggressively fight fires.

3. Re: impacts of operations on private land and on the effective use of private

2/1/2008

resources to fight fires

Private contractors do have an equal opportunity to provide service. These opportunities could be advertised more widely, however. Equipment inspections should be available across the state at locations convenient to all potential contractors. Inspections should take place well before fire season to give all interested contractors a chance to prepare for future contracting. Contractors should be chosen based on the proximity of their equipment to the fire; i.e. the closest equipment should be chosen first, provided that it meets the specific need. It is inefficient to bring in equipment from 500 or even 100 miles away when there is equipment available closer to the fire. If firefighter safety courses are needed for contractors, these courses should be plentiful and easily accessible.

4. Re: state and federal forest management policies and how those policies may contribute to an increased number of wildfires, greater safety risk to firefighters, or compromised effectiveness of fire suppression efforts

In regard to these forest management policies, there is no need to save fuels for later conflagrations. Prescriptive burns have their place. They should be used to burn off logging debris that has no salvage value. I believe that excess burning is a contributor to CO2 emissions.

Heisel, Leanne

From: Arvin Arthun [purepro@imt.net]
Sent: Friday, February 01, 2008 11:41 AM
To: Heisel, Leanne
Subject: fire fighting

When there is no communication amongst the various fire fighting agencies, then there should be some combined training for all involved so that everyone is on the same page from techniques to whom is in charge. Local firefighters can be invaluable in an emergency.

In the case of rural fires, it is best whomever is first on the scene, should proceed in starting to fight said fire regardless.

Heisel, Leanne

From: Gary E Hall [garius@centurytel.net]
Sent: Friday, February 01, 2008 12:01 AM
To: Aubyna; Joyce & Jim Hollopeter; Clarence Taber; Clarice Ryan; Dave Skinner; Fred Hodgeboom; Jerry O'Neil; Tom Nescvacil; Rob Burness; Paul Beaumont; Dan Smith; Ron Charlton; Heisel, Leanne
Subject: Fire Suppression Comments
Attachments: commentFireINterimCommittee.doc

Leanne Heisel

I have attached my comments for the Fire Suppression Interim Committee. Please forward to the committee.

Here below are the concluding paragraphs to my full comment.

In conclusion, discounting the effects of drought, the blame for the growing extent of wildland fire in terms of acres, destructiveness and cost lies not with private property owners, loggers or recreationists but rather with forest management and fire fighting policies.

To reverse this trend we must:

1. Reduce fire fuels starting first in the WUI and extending out away from WUI where most large fires start up.
2. Stop ripping out roads that could provide fire fighter access
3. Use locked gates instead of barriers when roads need to be closed and provide firefighters with tools to open those gates and permission in advance to use them.
4. Firefighters will have boots on the ground at the fire lines at first light if not before.
5. Recognize that fire of the type and scale we have seen recently is neither good nor natural and adopt an aggressive firefighting philosophy.
6. Train and activate more initial attack fire crews.
7. Streamline fire contracting, hiring and training.
8. Use whatever leverage possible to convince federal forest managers to adopt these policies. This could even include the threat of lawsuit due to mismanagement that contributes to increased fire threat and costs. Review and renegotiate all contracts, cooperative agreements and MOUs with federal government having to do with firefighting with the purpose of implementing the suggestions above on both state and federal lands
9. Educate forest landowners and seek ways to help them to reduce fire threat on their property but do not blame them for rising costs which they have no control over.

I am sure there are other things that should be done but I am confident that implementing these ideas will improve the situation. Thank you for the opportunity to comment. I would like to request a hearing in the Flathead. We seem to have as many or more fires than anywhere else in the state.

Gary E Hall
Montanans For Multiple Use - Board Member, Webmaster www.mtmultipleuse.org
Save The West - President, webmaster www.savethewest.net
881-2345

2/1/2008

Gary E Hall
POB 133
Olney, MT 59927
881-2345

FIRES OF 2007

Members of the Montana Legislative Fire Suppression Interim Committee

Across the nation, 9,375,530¹ acres went up in smoke this summer. This is an area larger than Connecticut, Massachusetts, and Rhode Island combined.

This year wildfire on the Flathead NF and in the immediate vicinity burnt 414,251² acres and cost over \$120.8³ million. These costs are not the final figures and do not include mop up and rehabilitation activities. Two of those fires burned west of the Flathead filling the valley with smoke for weeks. Twenty-six⁴ structures were lost but no one died directly from the fires although there are unsubstantiated reports that a few people may have succumbed to smoke inhalation.

Fires need 3 elements: heat, fuel, oxygen. There is no argument that the hottest summer in the northern rockies was a big factor in the 2007 fires. But 2007 is only the latest in a series of bad fire seasons. Comparisons between drought years and bad fire years do not show a clear connection between drought and fire. 1910 was the worst fire year ever in Montana but it only moderately dry here. Are there causes other than weather behind these fires that seem to get worse every year? Which of the three elements can we manage and how?

Wildland fire fighting is all about reducing fire temperatures with water and removing fuels from the advancing flame front. Since we can never put enough water on a large wildfire to put it out, firefighters concentrate on slowing the fire with water while removing fuels. That is about all we can do after the fire has grown large and dangerous and the weather is working against us.

However, I believe there are two things firefighters can do that they currently are not. They can work harder at putting the fire *dead out* while it is still small and manageable and they can work in the early hours of the morning when temperatures are lower, humidity higher and fire behavior less extreme.

Reducing the risk of catastrophic wildfire will require significant changes in policy and mindset for the forest service. In the short term, changes in firefighting policy can have immediate effects. But in the long run, forest managers must do much better at strategically reducing fire fuels and creating fire breaks

Initial attack crews on both the Skyland and Brush Creek fires were delayed by barricades or locked gates for which they had no keys. These crews should be provided with master keys or tools to open gates. Barricades should never be used on roads that provide primary access into large areas of 500 to 1000 acres or more. Initial attack crews should always be provided with helicopter support without delay when they ask for it. Forest Service managers should be prepared to recruit, train and field additional initial attack crews when continuing drought and weather forecasts indicate a bad fire season. Forest Service hiring policies should be streamlined to expedite hiring when fire seasons blow up. I know of several horror stories of trained and experienced fire fighters, some with their own equipment, who were unable to fight through the red tape to get to the fire lines.

Firefighters should have boots on the ground at the fire at daybreak. By 10 am, noon at the latest, the fire is heating up and becoming unworkable. I know that on many days firefighters had to pull back from the Brush Creek fire and either watch from a distance or go back to camp by 1 pm or earlier. While some risk is inherent in the job, no one wants firefighters to risk their lives. On this fire, the morning briefing was held at 7 am, at least 2 hours after first light. By the time they got to the fire it was 8:30 or later. Yet loggers on hoot owl restrictions leave for work long before dawn so they can start at first light and get in a day's work before they have to quit at 1 pm. Why can't firefighters do the same? Of course they would have to leave the fire earlier - just about the same time they were forced off the fire on most days. After they return to camp, a smaller crew on second shift could watch the fire and be available for emergencies or any opportunities the weather afforded. Suggestions to implement this schedule were ignored on the Brush Creek fire. As far as I know, this late start on the day is standard procedure for FS firefighters.

But it wasn't always that way. I can remember when fires were fought all night long. Old timers swear that night and early morning is the best time to fight fire. Also the FS once had a policy of "dead out by 10 am the next morning" after a fire was discovered. No more. In those days there was no waiting for contracts and recertification or training and permission to go behind gates. If there were loggers anywhere near they dropped what they were doing and went to the fire bringing their chainsaws, cats and skidders with them. And more often than now they put those fires out.

I suspect that the current mindset of the Forest Service is focused on fire as a tool rather than a danger to be controlled. The difference might be subtle but it plays out in a less than all out response in the early stages of the fire when the opportunity to control it is highest. As long as the fire is just burning trees and wildlife they don't get aggressive especially if the fire is in a remote area. If the fire is in wilderness they just watch it until it breaks out of the wilderness area. That is usually too late for effective fire fighting.

Environmentalists claim that logging and fire fighting is the cause of the dangerously high levels of fire fuels we now have on most western forests. But their theories only apply to dry low altitude ponderosa forests which we don't have a lot of here in western Montana. In this area, most natural fires are stand replacing. They don't just burn the

brush and small trees; they clear cut by fire. It is much better stewardship of the land to selectively log, leaving larger trees and removing the brush and saplings. After that the stands should be thinned from time to time to keep the fire fuels under control.

Environmentalists have a quasi-religious notion that anything natural is good and anything touched by humans is bad. Appendicitis is natural but it can kill a person and that is bad. But humans have learned to treat this disease and that is good. Small controlled underburns can be good but stand replacing fires kill the forest and everything in it. Good management of forest vegetation can:

1. reduce destructive impacts of fire
2. reduce the cost of fire fighting
3. generate income for the treasury or for other forest management uses
4. promote a better local economy
5. provide the nation with wood products
6. improve forest health
7. protect public and private property.

Environmentalists have many excuses for not managing our forests but no good reasons. All of their arguments are based on incomplete or faulty science. Most of their concerns that do have some validity can be mitigated and even if they can't the minor negative impacts of active management are outweighed by the positive results.

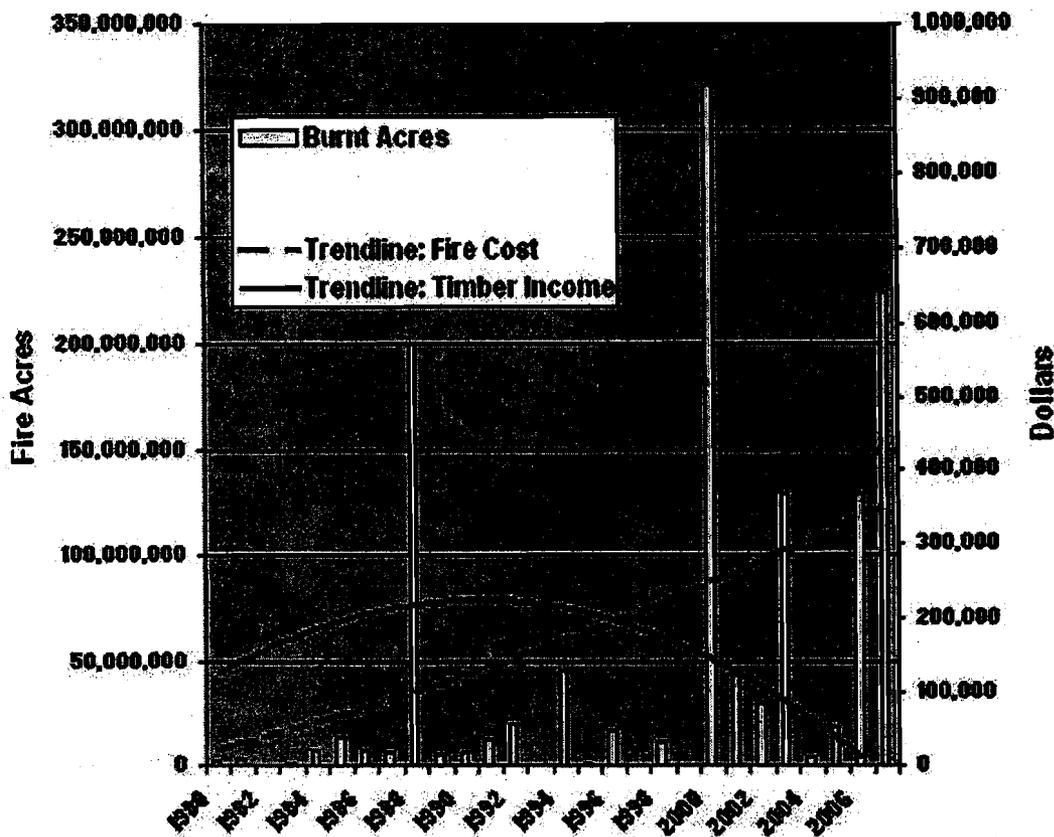
The Forest Service claims that their hands are tied by environmental law but that is only partly true. Time and again our experience with FS reveals that they have more latitude than they admit to. FS publications endlessly repeat the mantras of environmentalists. I believe that many FS managers would rather collaborate with environmental obstructionists than aggressively battle them in court.

This chart shows the trend lines for income from timber harvests and fire suppression costs since 1980.

Fire suppression is the dashed line that rises steadily from left to right. The chart also shows burnt acres. All data is for Region 1 of USFS and does not include acres, income or costs on state and private land. The trendlines and burnt acres is from data provided by Region 1. The dollar amounts have been adjusted for inflation to year 2000 dollars. CPI data for inflation adjustment is from Bureau of Labor Statistics.

There is an increasing concern about fire costs and how to lower or at least contain them. There is no mystery about why fire suppression costs are rising. There are more large fires to fight than in previous decades. The USFS, other federal and state agencies as well as environmentalists have been pointing the finger at the WUI (Wildland/Urban Interface) They say it costs more to fight fire in the WUI. This irrational conclusion flies in the face of common sense. The WUI is closer to support infrastructure for fire fighters. It has more roads which act as fire breaks. These same roads increase fire

TIMBER INCOME vs FIRE SUPPRESSION COST



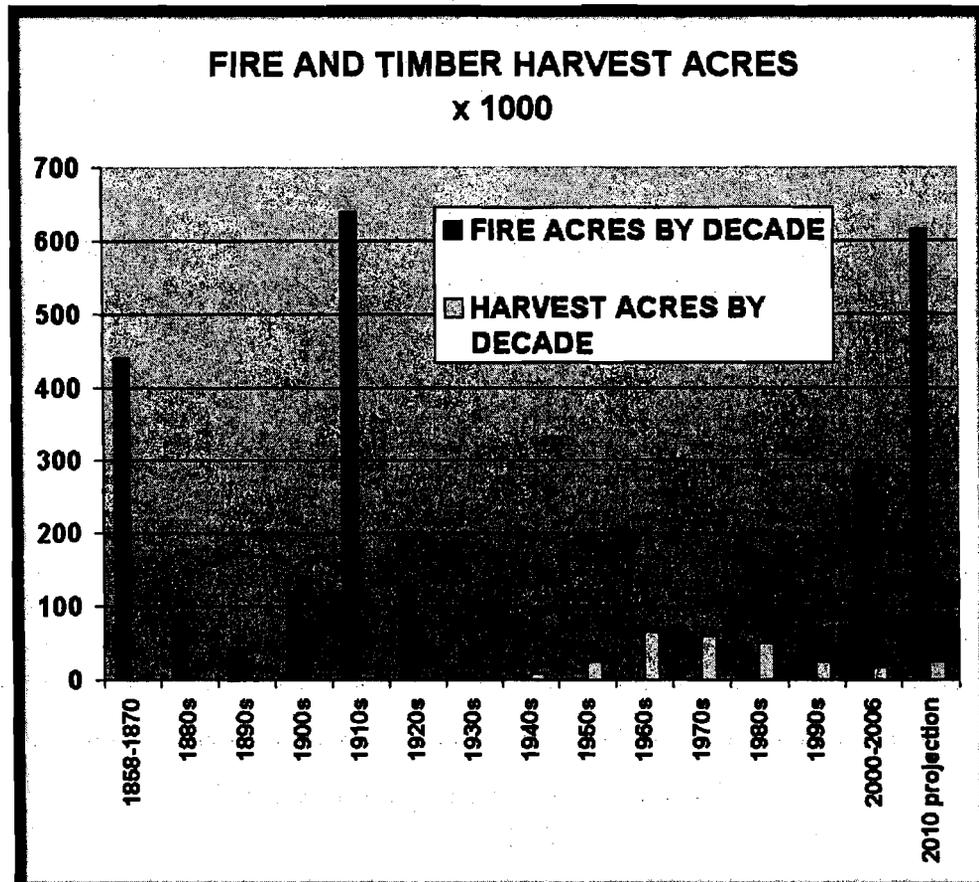
fighting effectiveness by speeding fire crews to new fires or outbreaks of old ones. The WUI has been logged more heavily and if the logging units have been managed properly by thinning they too will slow or stop fires.

If fires start in the WUI they are far more likely to be put out quickly. This brings us to the real reason why fire fighting costs rise as the fires approach the residential area of the WUI. Simply put - they are fought harder. More fire crews, more aviation, more money. If fires far from the WUI were fought with the same urgency as they are closer in, they would not grow as large and they would be put out sooner. Consequently, they would cost less money.

I suspect that the real agenda of many who blame private property owners who want to live in forested areas for the rising cost of fires is to enact regulations on that land and ultimately force people out of the WUI and into the cities. But there will always be a WUI somewhere. The best cost saving solution is to control the fires and fire fuels instead of controlling private property.

The next chart is for the Flathead Forest only and does not include state or private lands. The data comes from FNF monitoring reports and other FNF sources as well as National Incident Command Center (fire). There is a data gap for fire acres for 1990 and 1991 but we know there were very little fire on the Flathead in those years. While accurate for

the Flathead NF, the chart does not adequately depict the very bad fire year of 1988, the year of the Yellowstone fires which burnt over a million acres in and around Yellowstone NP. That same year the Red Bench fire burnt from the North Fork of the Flathead into Glacier NP. It was a large fire but more acres burnt in Glacier than on the Flathead NF



Notice that the decades from the 30s to the 80s were relatively fire free. This same pattern is shown on a map of fire acres in 11 western states for the same period. While many of the worst fire decades and years coincide with drought years there are notable exceptions. The 1910 fire in northern Idaho and western Montana burnt over 3 million acres. 1910 was only a moderately dry year in this area and the years preceding were wet years. It is also remarkable that there were few fires in the dust bowl years of the 1930s or the extended drought of the 50s. These were also dry years in NW Montana. Drought is only one factor in causing large fires. Another cause that may be more important is the long term buildup of fire fuels. Fire fighting policy is another factor influencing fire behavior. It may be that the new aggressive fire fighting policy that resulted from the 1910 fire combined with reduced fuels from the fires themselves caught up with wildland fire behavior in the 30s and with the help of active logging from the 60s through the 80s continued to impact wildland fire until a less aggressive fire fighting policy and reduced logging combined with drought resulted in raging fires in this new millenia.

Unless the weather cooperates or the Forest Service sees the light and changes their policies, we will continue to suffer through smoky summers and more of our neighbors will be burned out.

In conclusion, discounting the effects of drought, the blame for the growing extent of wildland fire in terms of acres, destructiveness and cost lies not with private property owners, loggers or recreationists but rather with forest management and fire fighting policies.

To reverse this trend we must:

1. Reduce fire fuels starting first in the WUI and extending out away from WUI where most large fires start up.
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4. Firefighters will have boots on the ground at the fire lines at first light if not before.
5. Recognize that fire of the type and scale we have seen recently is neither good nor natural and adopt an aggressive firefighting philosophy.
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8. Use whatever leverage possible to convince federal forest managers to adopt these policies. This could even include the threat of lawsuit due to mismanagement that contributes to increased fire threat and costs. Review and renegotiate all contracts, cooperative agreements and MOUs with federal government having to do with firefighting with the purpose of implementing the suggestions above on both state and federal lands
9. Educate forest landowners and seek ways to help them to reduce fire threat on their property but do not blame them for rising costs which they have no control over.

I am sure there are other things that should be done but I am confident that implementing these ideas will improve the situation. Thank you for the opportunity to comment. I would like to request a hearing in the Flathead. We seem to have as many or more fires than anywhere else in the state.

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¹ <http://www.nifc.gov/nicc/sitreprt.pdf>

² http://www.fs.fed.us/r1/flathead/fire/maps_07/fnf/2007_fire_vicinity_map_9_21_2007_1,100,000.pdf calculated sum

³ <http://www.nifc.gov/nicc/predictive/intelligence/archive/archive2007.htm> calculated sum of data on final report for each fire.

⁴ *ibid*