Prepared for the Montana Forest Owners Association at their request for an independent analysis of proposed fire preparedness assessments on private forest lands across Montana 7-19-2018

Montana Fire Preparedness Assessment – a private forest landowner perspective

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Introduction

Clearly wildfire fire preparedness and fire suppression are important for the majority of Montana residents, and the greater the capacity to maintain fire preparedness, the greater the effectiveness of successful fire suppression and the lower the costs. The key question being addressed is who pays for fire preparedness? Past records indicate that wildfires can start with a wide range of variability regardless of location, vegetation type or population across Montana (DNRC Chart 20, May 2018). The current proposal is that private land-owners of range, agricultural and forest lands should pay the entire cost of DNRC wildfire preparedness through a simple fee assessment to individual land parcels, and the houses located on them. This proposal is simple in its application in that it relies on an existing Montana Department of Revenue database; however, it also appears to apply some considerable cost-benefit inequity for the following reasons:

1. Both research and past experience have shown that wildfires, if left uncontained, can affect both rural and urban Montana residents. Thus wildfires need to be contained somewhere, especially when they emanate from the extreme fuel conditions found across many federal wildlands. Currently urban structures may be more ignitable than rural structures simply because there has been an assumption that only houses in the WUI are susceptible to wildfire impacts. Burning embers can commonly be carried by wind or smoke plumes for over 1 mile outside the active fire perimeter, thus endangering urban dwellings as well as rural landowners. For example, it has been observed that a significant number of homes within the city limits of Helena and Missoula have highly flammable roof coverings and easily ignitable landscaping vegetation.

2. Many rural private forests are being managed for fuels reduction and have constructed access routes that allow for effective and cost-effective fire containment and suppression. The Montana Slash Hazard Reduction law requires that any harvested area must have fuels reduced to limit fire spread and intensity for which a state bond is posted by loggers and landowners until the work has been completed. This is different than unmanaged lands that typically have limited access and significant fuels build-ups. Since 1992 the Montana Forest Stewardship program has resulted in more than 2225 land ownerships developing forest management plans on over 1.2 million acres that include wildfire fuels management and access. Much of this work has been conducted at the landowner's expense. The existing and future work that helps suppress wildfires on rural private lands benefits all other Montana residents, even though the burden of these costs is often carried by the individual rural landowners who are, through the existing proposal, expected to also pay for the entire cost of DNRC fire preparedness.

3. Assessing a wildfire preparedness fee on a per parcel basis assesses multiple fees on landowners who own contiguous rural lands comprised of multiple parcels. Maintaining wildlife habitat, open space, watershed quality and integrity, and forest/range productivity are all values highly coveted by the Montana population. Open space acquisition is a high priority for every Montana community. Relatively low land productivity across Montana requires that a landowner who wishes to actively manage his or her natural resources maintain a larger land-base to make it commercially feasible. As written in the current proposal, a landowner who has acquired 40 acres comprised of four 10-acre parcels will pay 4 times as much in wildfire preparedness fees as an adjoining landowner who owns one 40 acre parcel. An assessment fee based on a per parcel ruling is extremely unfair, and may encourage landowners to break-up managed forest ownerships comprised of multiple parcels and sell them for development. An independent assessment of family owned forested tracts and landowners by MSU Extension Forestry indicates that there are 52,848 parcels of forested lands over 10-acres in size owned by 28,112 landowners for a total of 4,375,520 acres. If 5-10 acre parcels are included, the ratio of tracts per ownership are estimated to increase significantly more.

Fairly assessing fire preparedness fees across the state of Montana is a difficult task. The current rubric of assessing a minimum fee per ownership and an additional prorated fee on a per-acre basis was the result of much past research and negotiation as well as an inherent sense of fairness. Montana forest owners have always acknowledged a willingness to pay their "fair share". However, the current proposal does not meet this criteria where all or the majority of the fire preparedness fee is assessed to rural landowners. Wildfires must be contained somewhere, and a preliminary analysis of current trends of public lands fire suppression has shown that the front lines tend to be on private rural ownership because federal lands are increasingly adopting a "let burn policy." In addition, Federal lands have a significant proportion of extremely high fuel loading, and in many situations limited access that creates a scenario of difficult and expensive wildfire suppression and containment.

Current Situation

To protect human lives, infrastructure and livelihoods from wildfires, a combination of wildfire preparedness and wildfire suppression has been very effectively employed. The former ensures that fuels management, ignition sources and suppression capacity are addressed so that when wildfires occur, they can be effectively attacked and contained by the latter, active wildfire suppression. The costs for wildfire preparedness and wildfire suppression, although budgeted individually, are integrally linked because a landscape and community that is adequately prepared for a wildfire can also more effectively and actively contain and suppress unwanted wildfires, which is turn also costs less in money and lives.

Rural private lands currently carry an enormous burden of helping protect communities, livelihoods and infrastructure from wildfires by appropriately managing fuels on their lands. To be fair, one must acknowledge that there are private landowners who do not manage fuels and access on their lands, and have built houses in wildfire indefensible locations. These situations have led to a somewhat false narrative that the primary beneficiaries of wildland fire preparedness, control, and cost are residents in the Wildland Urban Interface (WUI). However, there are a significant number of private forest landowners who may also locate their homes on their forested property that greatly aid fire

preparedness and fire suppression by the management actions and assets they pursue on their properties (Appendix 1). These landowners and lands rarely capture media attention because they do not offer pictures of flaming houses, torching trees, injured fire fighters or dead animals. However, after a wildfire has burned through an area, they are easily identified as the green patches that remain within a blackened landscape.

Wildfires are a phenomenon wherever warm dry summers allow fine fuels to dry to the point where they easily ignite and spread from lightning or human caused ignition sources. Historically, wildfires were both random events generated by lightning, and human created events for the purpose of clearing vegetation, improving rangelands, and even methods of warfare. Since the development of a farming, ranching, wood products and mining economy across the central and western U.S., experiences with wildfires resulted in unacceptable risks and harm to the greater human population (Appendix 2), and mechanisms to reduce or limit the capacity of wildfires to endanger human livelihood were employed, typically funded by a combination of national, state and municipal sources. Wildfire occurrence and behavior is generally accepted to be the result of climate, weather, topography, fuels and ignition sources. Of these, only the last two: fuels and ignition sources, can be significantly influenced at a local scale by human activity.

Wildland Fire Behavior

Landowners are a key component to both wildfire preparedness and wildfire suppression because their land management activities such as tree density and surface fuels treatment reduce the probability of a wildfire ignition turning into an active wildfire, and increase the effectiveness of suppression efforts (MacCleery, 1994, Kolb 2002, Loehle 2004, Backus 2005, NACD Community Wildfire Desk Guide & Toolkit 2009, Williams 2014, Vaillant and Reinhardt 2017). Fine fuels (1-hr fuels) are well accepted as the main component that allows a wildfire to ignite and spread. Larger fuels, often categorized as, 10-hour, 100-hour and 1000-hour fuels based on their time needed to dry to a point that allows for combustion, also factor into wildfire behavior, but only when fine fuels are part of their distribution, and when significant drought allow these larger fuels to dry to the point where they can ignite (Rothermal 1983). As such, grass, forb, brush and dead leaves, needles, and tree twigs are the fuels of greatest concern with regard to wildfire ignition and rate of spread during the average year. Crops such as hay, wheat, oats, etc. fall into this same category, especially when they mature towards the middle and end of the growing season.

Wildfires that burn into large acreages with ample fine fuels can proceed quickly and with enough intensity to impact farms, livestock, municipalities, and any people unfortunate to get caught in their path. In recent years thousands of homes and dozens of lives have been lost when wildland fires burned into urban areas such as California 2017 (10,000 homes and 43 people), Fort McMurray Alberta in 2016 (1600 homes, 2 people) and Black Saturday Australia (4000+ structures and 173 people). The speed at which a wildfire burning in fine fuels such as rangeland or crops progresses is a major point of concern, with a fire progression of 6 to 14 miles per hour considered common, and responsible for some of the greater losses of fire fighter lives in recent and past history such as Yarnell Arizona (19 lives), Storm King in Colorado (14 lives) and Mann Gulch, Montana (13 lives, Rothermal 1993). In 2017 the Lodgepole fire complex in Montana burned across 270,000 acres of mixed forest and range lands in just two weeks.

Forest fires carry with them their own risks, which include intense energy releases from vertically integrated and large diameter fuels that create convection columns that can reach 25,000 feet in altitude and disperse burning embers for miles across the landscape. This often results in "spot fires" miles in advance of the active fire front, including into any city or town located downwind (National Fire Protection Association). Most homes lost to wildfires are ignited by such wind dispersed burning embers, as opposed to a burning fire front that sweeps into homes or towns (Calkin, Cohen, Finney, Thompson 2013) and assessments of many Montana municipalities indicates they are at significant risk from such wildfire ignition sources. Wildfires burning in heavy fuel accumulations move across the landscape as an active fire front at a much slower rate of speed than range fires, typically 2-7 mph; however, when burning in large fuel accumulations they are extremely difficult to contain or suppress. In 2017, two of the largest Montana forest fire complexes, Rice Ridge and Lolo Peak burned across 160,182 acres and 53,902 acres respectively, but it took almost three months for these fires to burn across this area, finally allowing containment only where fuels had been mitigated or cool wet weather occurred in mid-October. In general, large acreage forest fires typically can only be contained by extensive fire lines where fuels have been previously mitigated, backburn or burnout activities instigated, or when cool wet weather has suppressed wildfire intensity. Both range and forest wildfires carry with them significant risks to municipalities, though also with slightly different mechanisms of fire dispersal that require different preparedness strategies and expenses.

Effectively treating fuel accumulations varies by vegetation type. Fine fuels commonly found across range lands are produced annually, and must be treated with some form of annual management that can include shading, mowing and grazing. Larger diameter and forest fuels accumulate at a slower pace, and are subject to the varying moisture regimes found across the mountain landscapes in which they grow. Wetter sites tend to have greater growth rates that initially support tall brush species and eventually denser and taller forests. When such forest situations grow overly dense, trees compete with each other for water and their dense canopies also reduce effective precipitation by capturing rain and snow on their canopies that evaporates before reaching the soils. Thus overly dense forests can exacerbate a drought condition, resulting in lower live fuel moistures, greater dead fuel accumulations, and the potential for extreme wildfire behavior. Alternatively, modestly thinned forests allow for greater moisture penetration and storage, easily observed as deep residual snowpacks in the spring. Shade and wind protection from residual trees can protect and allow for more gradual melting of snowpacks, and longer soil moisture retention. Several studies have measured this impact, some showing between a 40 to 200% increase in annual streamflow within drainages comprised of thinned and roaded forests (King 1989, Troendle 1983, 1988). The impacts of forest density reductions on wildfire behavior may also be noticed by the effects of higher live tissue moisture content, making trees less flammable and reducing wildfire rate of spread and intensity.

Continual tree density management, which many private landowners practice is a critical component for maintaining forest wildfire resistance. Managing for ideal conditions is site specific and assistance from trained forestry professionals such as DNRC service foresters, consultants, conservation districts, industry foresters and extension agents has proven very effective across Montana. Such forest management applications, common to many private forests have shown themselves to reduce wildfire rates of spread, fire intensity and fire severity that has allowed for effective wildfire containment and suppression (See Appendix 1) both for successful initial attack and containment of larger landscape wildfire events. Thinned forests, both on wetter and drier forest types, are actively sought and used by fire suppression teams as locations to effectively and safely contain and suppress wildfires. The

beneficial impact that active private forest management across Montana has had on successful wildfire suppression and containment, versus the challenges and cost of wildfire suppression and containment in dense and stagnant forests should not be underestimated.

An additional important component of effective wildfire preparedness is maintaining access to wildlands. It is well established that fire suppression is much more effective if an ignition is caught before the fire has spread beyond several acres. Quick site access of firefighting personnel is essential to catching a wildfire when it is still containable. During extreme weather conditions the application of water or retardant is the only method to fully extinguish a fire start. This must be done either with aid from a pumper truck, by using a local water source, or by aerial application (helicopter or fixed wing). A useable road network is an essential component for effective wildland fire suppression, and another common component found on actively managed private forests.

Alternative Fire Preparedness Concepts

The incentive/penalty discussion for landowners who manage lands for public benefit has been an active discussion for more than two decades. Significant income tax advantages have been developed for rural landowners who enroll their lands in some form of conservation easement. However, landowners who use firewise principles for their homes, and practice fuels reduction management are not offered any incentive by homeowners insurances or property taxes. Montana does recognize the contribution of private non-industrial forest owners to the wood products infrastructure by offering a forestland yield tax to forest owners with a minimum of 15 contiguous acres of productive forest (although only 18% of the forested land base, family owned forests contribute an annual 30% of the total harvested wood in Montana). With regard to wildland fire preparedness costs, a fee assessment that occurs for all home and property ownerships inclusive of urban and rural location, and is prorated by acreage would seem to best and fairly meet the current funding needs, and fairly share the benefits of such preparedness. The state of Montana might also better meet the goals of encouraging wildfire preparedness and suppression effectiveness by endorsing a "wildfire preparedness fee reduction" to landowners who own forest or range acreage and meet certain criteria, while assessing a higher fee on properties that demonstrate high fuel loading and limited fire suppression access. The following matric might be considered for discussion:

To meet wildfire preparedness fee reduction criteria, landowners must show:

1. Acceptable access to their lands for a wildfire pumper truck and crew.
2. A reduction of forest canopy and ladder fuels appropriate for the productivity class of the forest. (The guideless can be developed and periodically revised through cooperative work between DNRC, MSU Extension, the Montana Forest Owners Association, and appropriate faculty from the W.A. Franke College of Forestry and Conservation.)
3. A management plan and actions to maintain a sustainable control over fine fuels though grazing, mowing or over-story tree canopy manipulation.
4. GPS based locations of available water sources on the property (accessible ponds, springs, streams).

These can be verified through a variety of mechanism including DNRC foresters, MSU Extension Forestry, consultants, Conservation Districts, etc. The state of Montana should also work with rural fire

departments to create and periodically update accessible fire hazard reduction maps for every fire district. The latter is desperately needed because large federally managed project fires currently have fuels maps for all federal and state lands but nothing is available for analysis of private lands. This lack of knowledge has led to some alleged and potentially harmful uses and activities on private lands by some fire suppression teams for burnouts and backburns. Under current climate trends the occurrence of wildfires is unquestionably becoming more extensive and costly. Setting a well-constructed framework that addresses costs, fuels conditions, land management and existing federal, state, municipal, and private enterprise fuels management infrastructure would provide the greatest benefit to the most people at the lowest cost.

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Appendix 1

Fire behavior from the Roaring Lion Fire 2016 in the Bitterroot. The fire moved from right to left, transitioning from an active crown fire on unmanaged federal lands to a an easily controllable surface fire on thinned and treated private lands on the left.

The Blackcat fire (2007) burned as an active crown fire from federal lands onto industry lands (left side of picture) and thinned and treated private lands (foreground) where it transitioned into an easily contained surface fire that was controlled from access roads by pumper trucks and minimal hand crews.

Burnout that was conducted on thinned and fuel reduced private forest lands (foreground) to help contain wildfires burning towards communities from federal lands (background) on Lolo Peak fire 2017.

Appendix 2

America's Most Devastating Wildfires

Fire	Date	Location	Acres Burned	Lives Lost	Property Damage	Notes
Miramichi Fire	October 1825	New Brunswick, Canada and parts of Maine	3 million	160	Unknown	Limited records kept
The Great Fire	1845	Oregon	1.5 million	Unknown	Unknown	Limited records kept
The Silverton Fire	1865	Silverton, Oregon	1 million	Unknown	Unknown	Limited records kept
The Peshtigo Fire	October 8, 1871	Peshtigo, Wisconsin/ (moving into Upper Michigan)	1.2 million	As many as 2,500	unknown	Deadliest fire in American history. The fire created its own wind system and turned into a tornado.
The Great Michigan Fire	October 8, 1871	Michigan (Various regions)	2.5 million	200	3,000 buildings destroyed	

Hinckley Fire	September 1, 1894	Hinckley, Minnesota	160,000	418		
Yacolt Fire	September 1902	Washington Oregon	Over 1 million	38	146 homes	
The Big Burn	August 1910	Northern Rockies/ Washington, Montana, Idaho	3 million	87	Estimated $1 billion in timber destroyed	
Cloquet Fire	October 12, 1918	Cloquet, Minnesota	1.2 million	Over 450	$73 million	
Griffith Park Fire	October 3, 1933	Los Angeles, CA	Unknown	29 firefighters		
Tillamook Burn	1933-1951	Oregon Coast Range	Combined 355,000	Unknown	Unknown	Between 1933-1951, a wildfire occurred in the same area every six ears. Each burned for several days.
The Great Fires of 1947	October 17 - November 14, 1947	Maine	Over 200,000	At least 15	854 homes destroyed; between $50 - $100 million in damages	This was dubbed, "The week that Maine burned."
Mann Gulch Fire	August 5, 1949	Helena National Forest, Montana	4,500 (3,000 of which were consumed within 10 minutes)	13 firefighters (including 12 smokejumpers)		New safety measures and training techniques were established by the USFS as a result of the Mann Gulch Fire.
Rattlesnake Fire	July 9, 1953	Mendocino National Forest, California	1,300	14 firefighters, 1 Forest Service employee		Forest Service establishes changes in wildland fire training, firefighter safety standards, firefighter knowledge and awareness of fire weather and fire behavior.
Inaja Fire	November 25, 1956	Cleveland National Forest, California	43,904	11 firefighters		
The Coyote Fire	September 1 - October 1, 1964	Santa Barbara, California	67,000	1 dead, 227 injured	157 structures destroyed, including 94 homes; $5.7 million in damages	

Laguna Fire	September 26, 1970	San Diego County, California	Over 175,000	8 civilians	382 homes destroyed	
Siege of '87	1987	California	640,000			
Yellowstone fires of 1988	June - November 1988	Yellowstone National Park	Nearly 794,000			Continuous fires throughout the summer
South Canyon Fire	July 3-6, 1994	Colorado	2,000	14 firefighters		A post-fire investigation results in fire management qualification standards that heighten safety and professionalism in fire management programs.
Cedar Fire	October 25 - November 3, 2003	San Diego County, California	Over 280,000	14 people (including 1 firefighter)	2,280 buildings	Part of 2003 Fire Siege
Taylor Complex Fire	June 12, 2004	Alaska	Up to 1.7 million			2004 was the worst fire season on record for Alaska, with up to 6.6 million acres burned. The Taylor Complex Fire was the state's worst fire of the year.
Esperanza Fire	October 26, 2006	Cbazon, California	40,200	5 firefighters	34 homes, 20 outbuildings; $9 million	In 2009, Raymond Lee Oyler was convicted of first-degree murder for setting the Esperanza Fire that killed 5 firefighters.
Murphy Complex Fire	July 16, 2007	Idaho and Nevada	653,100		$9 million	This was Idaho's largest wildfire since the Big Burn in 1910.
Trigo Fire	April 15 - May 22, 2008	New Mexico	Nearly 14,000		59 homes; $11 million containment cost	
2008 California Fire Siege	Summer 2008	California	1.2 million by autumn	13 firefighters		2,000 fires throughout the summer.
Wallow Fire	May 29, 2011	New Mexico and Arizona	538,000			
2011 Texas Wildfire Season	November 25, 2010 - October 31, 2011	Texas	4,011,709			In 2011, there were 31,453 wildfires in Texas - the state's worst fire season on record.
Yarnell Hill Fire	June 30, 2013	Yarnell, Arizona	Over 8,000	19 firefighters		

Carlton Complex Fire	July 2014	Washington	Over 256,000		At least 340 homes	This was the largest wildfire in Washington's recorded history.
California fire complexes	2017	California	Over 552,900 acres	46 civilians and firefighters killed, 63 injured	10,367 homes and structures destroyed	20,000 people evacuated, fires grew by 1000's of acres every day through urban areas

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July 26, 2018

Environmental Quality Council
State Capitol, Room 317
1301 E 6th Ave
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Mister Chairman and Committee Members:

Please accept this submission by the Montana Forest Owners Association (MFOA, described below) concerning the topic of "landowner assessment fee" to fund fire preparedness to be discussed on July 26 at 8:30 a.m. as part of "Fire-related study topics." The MFOA supports the concept that each taxpayer pay his or her fair share for fire preparedness costs. It appears that the new assessment proposal gives rise to a number of potential inequities. We respectfully suggest that further study be made of the issue prior to drafting any bill for the legislature to consider. Following are some of the inequities

Timber and rangeland management not rewarded
No recognition or consideration is given to those timber and rangeland owners who incur the expense and effort to manage their property to reduce the risk and severity of fire. Rural private forests that have been managed for fuels reduction and access allow for effective and inexpensive fire containment and suppression. These positions are supported by the attached analysis titled "Montana Fire Preparedness Assessments – a private forest landowners perspective" written by Dr. Peter Kolb, a highly respected forestry expert in Montana and the Northwest. Dr. Kolb is the MSU Extension Forestry Specialist and Associate Professor Forest Ecology & Management. He is surely known to many members of this Committee.

Burden shifted to landowners
The May 30, 2018, DNRC proposal is to place upon property owners (excluding federal, state, tribal and municipal) 100% of the $13.9 million fire preparedness costs. Under the current system all Montana taxpayers, irrespective of land ownership, pay approximately $8.2 million of the cost through the General Fund. In addition, federal government grants cover approximately $1.9 million. The remaining $3.8 million is paid by forested land owners in the west through "wildland fire protection district" assessments. It seems inequitable to place the entire funding burden upon landowners.

Assessment by parcel
The proposed assessment by parcel will result in inequities, some owners paying more than their fair share and some paying less. The parcel assessment bears no relation to how much land a person might own, or similarly the probability that a wildfire might need to be suppressed on his or her land .

Municipalities excepted
The new assessment proposal excludes parcels within municipalities upon the assumption that such parcels are already assessed fire preparedness fees by the municipalities. Although this seems equitable at first glance, this does not take into consideration that many persons in rural areas are also assessed taxes to support local fire facilities. Moreover, people and structures in municipalities benefit from fire

preparedness because fires do not recognize boundaries. Wildfires can and do spread from rural to urban settings. Thus, an argument can be made that all Montanans should contribute.

Increased fees/taxes to Montanans

And particularly, the DNRC should not fund 100% of its fire preparedness fees from new assessments without a corresponding reduction in the general fund collections that offset the new assessments.

Before discarding the current assessment system in its entirety, consideration could be given to amending the current system.

Thank you for your consideration and time.

Sincerely,

Mike Christianson

Mike Christianson
President

The Montana Property Owners Association, has been a Montana non-profit corporation since 1995. The MFOA's sole purpose is to protect and serve the interests of non-industrial private forest landowners. There are more than 29,000 non-industrial private forest owners that individually own forested parcels of 10 acres or more and cumulatively own in excess of four million forested acres in Montana. For more information, google MFOA or go to www.MontanaForestOwners.org