

**Questions from Fire Suppression Committee Members
and Public Comment Received
for Agency Q & A
10:00 a.m. - 12:00 p.m., April 28, Hamilton**

(text of the questions is copied verbatim from member emails, with outlining and formatting edits by staff as necessary)

Sen. Dave Lewis

I'd like to follow up on George Weldon's statement that the USFS does too much initial attack and fights more fires than they can afford to fight. That quote was in the publication that the Frenchtown Fire Chief gave the committee. That seems like such a major policy choice that it needs to be discussed. I agree with them, they don't have the money but we need to discuss the impact on state operations.

[The publication Sen. Lewis is referring to is *Wildland Firefighting and Structure Protection in Montana -- Position Paper 2008*, Montana County Firewardens Association. Following is the relevant passage from that document.]

Much has been said about Appropriate Management Response or the acronym AMR. You have heard it stated that it is not a let it burn policy and that it has been around for a long time. However, local fire agencies have concerns that it is a let it burn policy that directly impacts the communities and towns in Montana. George Weldon, Acting Director of Fire and Aviation Management for the USFS Northern Region was interviewed and his belief's expressed in an article in On Earth Magazine,

"Weldon says that firefighters misdirected resources in two ways this past summer. They spent too much energy protecting structures, and they put too much effort into "initial attack," which means extinguishing freshly started fires before they get big. In fact, 98 percent of all fires that started this year in the northern Rockies were extinguished within a few hours. This record would have conferred bragging rights two decades ago, but Weldon believes this approach is not sustainable; firefighters should have let more fires burn."

Sen. Rick Laible

The three questions I would like both DNRC and the Forest Service to answer would be:

1. With the closing of the Bonner mill, how will this effect the processing of logs within the Bitterroot Range-we've just lost one more option to removing fuel from our forests. What will Forest Service and DNRC do to adjust to this and future mill closures.
2. If either one of them had control over the management of our National and State Forests what plans would be in effect to reduce fuel buildup in the forests, the

removal of burned timber, and management of our forests to a healthy condition, including the removal of beetle killed timber.

3. With the closure of so many roads within our forests does it make good sense to close existing roads which provide access for fire suppression, and would there be a plan for road systems, loops, etc. that would assist in fire suppression.

Rep. Chas Vincent

1. One issue I would like the USFS to address is why fuel reduction projects aren't moved on once in appeal. The Wild West [Institute] response to my testimony on collaboration suggested that the projects could be moving forward regardless of the litigation. While I already know why they aren't willing to move on them, I think the committee should hear it from the horse's mouth. Perhaps you could forward the letter to them to provide context.

[The letter from the WildWest Institute will be forwarded separately.]

2. I would also like to have them address how travel management planning will effect the ability to access public lands for timber management, fuels mitigation, and ground resources used for initial attack of fires.
3. Another issue that will be effecting management direction is the Canadian Lynx critical habitat designation. The designation is going to encompass over 42,000 square miles of habitat in the lower 48. I would like to know how they believe the designation will impact the ability to access for management, and how much it will dictate the management prescriptions in the areas designated.
4. Lastly, as the agency's budget is fast approaching 50% for fire suppression, could the resources be spent on the front end for fuels reduction to mitigate the fire intensities in areas where "Fire Use" is determined to be the best AMR option.

FSC Staff

1. Where are the agencies with regard to salvage timber sales and rehabilitation?
2. Along the lines of Sen. Cobb's question #4 (p. 8), do you believe any changes to state law would be useful? If you could request state legislation to improve any of the problems you see in the state's land use, land management, hazard mitigation, or fire suppression policies, what would that be?

Sen. John Cobb

These are the questions or comments from Senator Cobb to federal agencies concerning fire suppression. The first ones in general have a higher priority than the later ones. It would be helpful if the agencies decide if they agree with the comments or disagree and if so how would the comments be written so they would agree with the comments.

1. Do you agree or disagree with the draft conclusions as to the draft report on Fire Outlook (see below)? If you disagree please explain. Whether you disagree or agree, what changes would you make to ensure that there is a very low risk of any or some of the predictions from occurring. Please explain which conclusions would be changed to lower the risks. What would be your time line for lowering these risks as to the conclusions?

Conclusions (from The Outlook of Fire draft report)

- With limited resources, and fuel and climatic conditions, it is likely that communities will burn, and firefighter and members of the public will be seriously injured or killed.
- Stress of fire season will continue to rise, affecting landowners, firefighters, business owners, state and federal agencies as well as members of the public.
- With limited resources to safely fight accessible fires, the costs for fire suppression and the damage to property and resources will continue to grow.
- Small businesses from tourism to farms and ranches will continue to be impacted, as they are unable to be compensated for business losses due to fires.
- The WUI will continue to increase without adequate controls on land development.
- Differences in fire suppression policies will continue to cause conflict between the states, federal, private and local agencies thus affecting cooperation of how fires are fought and suppressed.

2. In 2007 federal agencies began widespread implementation of appropriate management response (AMR) for all unplanned wildfire ignitions. There are several concerns that can be categorized into the following areas of emphasis:

- a. *AMR in current fire climate, with drought, fuel loading, extreme fire behavior:* Should any agency be contemplating something other than full suppression given these outlooks? Valid reasons for modified suppression are negated by the potential for fires to spread beyond their intended ecological boundaries in many cases.

▶ What is your response?

- b. *AMR implications for fires in or threatening the WUI and federal divesting of interface suppression responsibilities:* The Montana DNRC functions as much like a fire department as a wild land fire agency, and that mission includes protection of private property and critical infrastructure threatened by wildfires. Conversely, the federal agencies are wild land agencies, and there is constant discussion about the appropriateness of federal agencies fighting fires in the interface. However, it is important to note that there is significant federal acreage

defined as WUI by communities and counties across the state. Therefore, discussion about federal divestiture of structure protection and or interface suppression must include a plan to mitigate the fuel hazard and fire risk on federal holdings within the interface. Only then will it be reasonable to ask state and local government to assume more of the interface fire suppression role.

- ▶ Is there a plan to mitigate the fuel hazard and fire risk on federal holdings within and next to the WUI?
- ▶ Where is the plan or when will it be done for comment by state agencies?
- ▶ Even though the federal agencies have money for fuel reduction, what is the amount that is really needed on an ongoing basis for this state for fuel reduction?

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

- ▶ Do you agree with that public perception and how do you change that public perception if the public perceives it that way?

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

- ▶ Are the federal agencies required to get burn permits for prescribed burns?

- ▶ If the state or local agencies prohibit burning during a period of time, will the federal agencies suppress all fires immediately if possible as well as allow no prescribed burns?
- ▶ Will federal agencies pay fines for air pollution to state and local agencies?
- ▶ If the state of Montana or local officials put out fires on federal lands without permission of the federal agencies in order to protect the WUI, grasslands or other values including air quality, what will the federal agencies do about it?
- ▶ With the issue of CO₂, what are the federal agencies doing to prevent CO₂ from getting into the air in the first place? There is an understanding that if a fire cannot be put out immediately due to several factors, that is one thing, but immediate suppression should be the new way of stopping CO₂ from getting into the air and causing climate warming.

e. *Communication of intent by federal agencies during development of any and all AMR strategies.* While federal agencies to a commendable job of explaining the resource benefits of modified suppression, they do not clearly communicate their intent regarding protection of private property. Many view 'point protection' as a contingency plan for saving homes from a fire that should have been aggressively fought when it was still many miles away.

- ▶ Do you agree with that statement and if not why not?

A near constant criticism of federal agencies is that they are not aggressive enough on initial attack and that many large fires could have been suppressed when they were smaller.

- ▶ Do you agree with that statement and if not why not?

f. *Conflicting fire management mandates among federal, state and local agencies.* The Montana DNRC is a fire suppression organization with a full suppression mandate. While there are circumstances when another strategy is appropriate, the basis for those decisions is the statement that full suppression is always the first consideration. AMR seems to be the opposite: it appears that full suppression is treated as a last resort to be undertaken only if less aggressive, cheaper options fail. The clash of these two ideologies creates tension among federal, state and local partners.

- ▶ Do you agree with that statement or not?
- g. *Impacts of long duration fires on state and local resources.* The DNRC and its local partners are organized for aggressive initial attack; we believe that the safest, least expensive fire is the one that's prevented or the one that's aggressively suppressed as the smallest size possible. Once a fire escapes initial attack, management decisions are made for extended attack, which include relapsing IA resources as soon as possible. The main reason for that is to keep them ready to respond effectively to new fire starts. Long duration fires tie up local resources as well as DNRC staff to the extent that the IA mission is compromised. Even a supporting role on an incident- as an agency representative, local government contact, or liaison- requires significant time and commitment of resources. Over time this depletes firefighting resources and lessens our ability to respond to new fires.
- ▶ Will the federal agencies reimburse the local and state fire fighters and staff for the tie up of local resources even though the fires do not come out onto state and private lands?
 - ▶ Will the federal agencies fully reimburse local governments for police protection?
- h. *Compensation for losses resulting from point protection WFU, or other less than full suppression actions.* While it is difficult to quantify in some instances, there is a financial impact to communities and private landowners resulting from AMR policies. Even without losses of structures, there are losses such as grazing lands, tourism, recreation, and other infrastructure, i.e. fences, that must be considered.
- ▶ Should the federal government pay for 100% of the economic recovery as a result of fires they do not actively suppress?
 - ▶ What should the federal agencies pay for economic damage as a result of fires they do not actively suppress?
3. With continued pressures to lower fire suppression costs and address safety concerns, it is reasonable to expect AMR policies to be in place for the foreseeable future. There are, however, recommendations for mitigating some of the problems with AMR implementation. Specifically:
- a. Federal agencies need to better explain the concept of AMR to the public, other wild land fire agencies, elected officials, and other stakeholders. The time to do this is before the incident; clear communication of the policy

prior to the process of implementing it is key to gaining understanding.

- ▶ Do you agree with this statement and when will it be implemented if you agree?
- b. Agencies must involve all potential jurisdictions for any incident. Each must have the opportunity to voice their concerns/opposition throughout the AMR decision-making process.
 - ▶ When will this be implemented if you agree?
- c. Policies regarding fire in the wildland urban interface cannot be developed without a comprehensive effort to reduce the fuel hazards. Agencies must further clarify structure protection guidelines for fire in the interface. State, local and private entities must also recognize and take responsibility for their roles in WUI issues.
 - ▶ When will this be done?
- d. Agencies must be transparent in communicating their intent regarding all wildfire incidents. If, from the start, there is no intention of suppressing a fire, all cooperators, stakeholders, and the public need to know.
 - ▶ Is this done now?
 - ▶ Are the public told their chances of fire protection and suppression chances in large, small to medium size fires each year ahead of the fire season?
 - ▶ Do the federal agencies make clear what limited resources they have? Instead of saying what they will do if things go right, should they be instead saying what would probably happen in a bad case?
- e. If an agency representative, local fire chief, or other cooperator disagrees with the AMR strategy and subsequent wild land fire situation analysis (WFSA), they must inform the host agency in writing.
 - ▶ Do you agree with this and if so when will it be implemented?
- f. If a suppression strategy includes purposely utilizing private lands for fuel breaks or as tactical opportunities, private landowner must be well informed and as appropriate, be compensated for losses.
 - ▶ Do you agree with this or not?

4. What should this committee be doing to help you? How do you perceive of this committee? Is it perceived this is another do nothing committee or a "get you" committee?
5. Interagency fire suppression organizations can no longer expect to achieve full perimeter control on all large fires. Standard full perimeter control strategies are very costly and the many fire line hazards and risks are difficult to mitigate in providing a safe work environment for firefighters. Evolving wild land fire policy is dictating a need for wild land agency understandings decision-making, and implementation of appropriate management responses under alternative large fire suppression strategies. A lesson learned in multi jurisdictional partnerships in managing the 2007 Chippy Creek, Blackcat, and Jocko Lakes Fires is that the USFS, CSKT, and the State of Montana are not on the same page in regards to AMR, long term fall back protection strategies, and other alternative large fire suppression decision making and implementation that is impacting the public and communities.
 - ▶ Is this statement correct?
6. Alternative strategies require less fire suppression resource commitments and effort at lower costs and the public needs a better understanding of these fire policy concepts. These issues lead us to recommendations that more interagency dialogue, collaborative policy making, and increased agency administrator and public education are needed in defining agency fire suppression missions and in structuring future long duration fire suppression strategies.
 - ▶ Do you agree with these statements and if so when is the time implementation of these recommendations?
7. The cost of fire suppression is a principle issue of concern to all wild land fire agencies. One aspect of this issue is that federal agencies are reducing or capping annual fire severity funding that will compromise initial and extended attack successes. We would recommend that all wild land fire suppression agencies ensure and protect supplemental fire severity funding processes for the hiring of emergency manpower, equipment and aircraft. The State looks to Tribes for hand crews and heavy equipment resources; the Tribes look to the State for aircraft support. A pre-planned sharing of critical fire suppression resources is very important to interagency initial response, mutual aid successes.
 - ▶ Is this statement correct and how will federal agencies implement it and when?
8. How do the federal agencies believe the various public groups, individuals

perceive of the federal agencies as to how they suppress fire? How would the federal agencies change that perception if they think some of the public is incorrect in their perceptions? How do the federal agencies perceive to be the homeowners' and landowners' sense of responsibility in preparing for fires?

9. If you could rearrange the amount of money that is spent on fires in Montana over the last several years in order to save 30% or some amount of dollars spent on wild land fire suppression how would you do it?
10. What would be wrong with federal agencies contracting or appropriating to the state fire agency say a number of \$40 million per year for fighting fires near or on state and private lands, with the state being required to put up to \$20 million per year as well? The state would fight the fires on state and private lands as it sees fit. Then the state must deal with the WUI, must decide what to protect yet can contract ahead for fire season as well as fight the fires as they see fit.
11. Do federal agencies support some kind of hazard insurance or fire insurance subsidy for grass and private timber since those values cannot be insured?
12. Who decides what values are important to protect? Are state and local officials ever asked each year what values are important to protect?
13. How do federal agencies define what values are important to protect or have they ever asked the public what are important values to protect especially on private and public lands once the fires have left the federal lands?

The Fire Suppression Committee has received the following comments from members of the public and interested organizations. Please comment on whether or not you agree with the statements; if not, why not; and, if so, any plans for implementing changes.

In some cases, items have been edited for clarity.

1. Federal management to fighting large fires or even initial attack on fires is sending mixed signals to everyone including themselves. This is dangerous to firefighters, homeowners, and landowners. The federal management needs to be clear of their capacity to fight fires and how they fight fires to the public and other firefighters including their own. The longer the federal government management sends these mixed signals the greater the chance for firefighters dying and large number of homes burning including towns and communities.
2. Federal firefighting management needs to have surveys or reviews by the public where fires occur to get feedback on how the public perceives the fires were fought. There is little or no request for feedback from the areas where fires were fought except from fellow firefighters.

3. Each year before fire season, the state and local government and firefighting agencies must be advised ahead of time which federal areas will be considered full suppression areas.
4. There were many comments provided to the committee on how the federal fire agencies can communicate with state, local, and private entities better as well as issues on how fires are fought. The agencies say they are listening, but why are these issues being brought to our committee if the agencies are listening?
5. Fire should be dealt with differently in drought years than normal years. In drought years, a more aggressive approach should be used.
6. Federal agencies should not burn or back burn private land without permission of the landowner or the state if the fire starts on federal lands. If that occurs, clear compensation guidelines should be established ahead of each fire season so people whose lands are burned at least have an idea of whether they will be reimbursed or not.
7. Before there are permanent road closures by the federal agencies, there must be a determination whether the roads are needed for fire suppression activities.
8. *Watersheds*
 - a. We need a revised policy, which includes immediate suppression of fires in a watershed drainage in drought years.
 - b. The federal lands must take into account the value of watersheds for outside of their lands in determining letting fires burn
9. The budgets of the Forest Service are in decline in terms of real dollars available for management. Until their budgets can stabilize and not be used to fight fires each year, the Forest Service and other federal agencies are unable to manage the forests as they plan.
10. Why is okay to burn up grass and private timber by federal agencies without permission of the landowner? If a private landowner starts a fire and it goes onto federal land the landowner pays for the costs.
11. Federal policy makers must re examine their own definitions of "Wild land fire use" and the new term "fire uses fire" to determine their worth in the overall scheme of things. It is time for them to not only count the cost, but also face related liability when use of fire as a toll results in out of control fires spreading to other jurisdictions.
12. Federal and state fire management plans need a complete annual review to ensure

everyone is on the same page. Everyone doesn't have to agree on the reviews but talking about fire control during the fire season is too late.

13. The federal and state officials should have local meetings at least twice a year, which are widely known to the public.
14. Large, long term stewardship contracts like currently in place on the Apache-Sitgreaves NF in Arizona are not being encouraged in Montana primarily because of the bonding requirements required by the Federal Acquisitions Act. Recommend that land managers take more risk and implement long term stewardship contracts when economics allows. Also encourage federal legislation that reduces or eliminates the cancellation bond currently required for these contracts.
15. Roads are currently being seasonally closed on federal lands and are often impassible to firefighters because of the lack of maintenance. If a road is going to remain on the transportation system it should be made accessible to fire fighters.
16. Severity funds for fire fighting are not always adequate for state or federal agencies. How much do you need?
17. There is not always a consistent policy between and within agencies in regard to structure protection. One agency may attempt to save all homes in danger of a wildfire regardless of a lack of an effort by homeowners to "firewise" the property. Other agencies may not. Recommend agreeing to a consistent policy recognizing the available resources and time constraints may vary by fire.
18. State and federal agencies need to do a survey on what the public thinks in the area after a fire has been fought. The agencies review how they fought the fires afterwards, but they do not get public and local review. This should not be done in a public hearing but a good survey that people can fill out in the local area.
19. The federal AFC program specifically discriminates against small rural volunteer fire companies in the evaluation and award of federal grant funds.

The federal FEPP program, which is specifically designed to support rural fire organizations, does not support these local organizations in Montana because of the vehicle classification issue with the Working capital fund of the USDA.
20. The term wildfire and wildfire hazard are a very broad spectrum of situations that should not be applied equally. The most hazardous fuel conditions consists of large amounts of fine fuels such as cured tall grasses, brush and fine woody debris. Wildfire statistics show that range and brushfires have caused the most damage and injury to human health not forest fires. Grass and brush fires can burn

with high intensity and travel at great speeds, making fire suppression very difficult and dangerous. Forest fires can burn with great intensity in dense forests and/or with high surface fuel loading conditions, but do not typically travel with great speed.

21. Most forest fires are contained in areas where fuel treatments have occurred that prevent active crown fires and thinned trees suppress under story fuels such as grasses and a combination of moderate forest thinning, followed by controlled burning, can lead to less catastrophic fires. This two-step process, thin and burn can help reduce anticipated future catastrophic wildfires with their commensurate massive emissions of greenhouse gases and ecosystem devastation.
22. The federal agencies need to allow the state to apply the state's initial attack with air resources when they spot a fire unless the agencies have said no in an area weeks before.
23. The modern practice of not fighting a fire at sundown has to cease. Nighttime, even though more dangerous, is a very good time to fight a forest fire.
24. After each major fire, there should be input by local entities and private landowners as to reforestation and grass reseeding.
25. It should be clear each fire season by the federal and state agencies what landowners and others have for resources if they are burned. It is after or during a fire that these things come up. There should be regular information each year by many entities on what to do after a fire has passed and there is damage.
26. The Forest Service does not consider air pollution and its effects when allowing fires to burn.
27. Air quality restrictions need to be relaxed to provide for more burning of range and forestlands. This is particularly true east of the continual divide where there is increased forest encroachment on grasslands.
28. We need to have more local involvement in decisions made by management teams. We as stewards of this land know the terrain, know the area, where roads are, so we are capable of making some decisions without someone from another state telling us where and what to do. No one knows a ranch better than the rancher.
29. Capacity issues in assisting with suppression and or increased demands for the response operation. Montana needs to have a tactical team in place including a local official in each county to respond within minutes to hours-not days-to a fire. This plan must include helicopters or retardant planes than can respond to a crisis

immediately.

30. The EERA resources will always be an alternative available to fire suppression administrators. This provides them with a source for fire suppression resources upon exhaustion of those available by contract. The concern is two fold.
 - a. The continued use of EERA resources on fires while contract resources are being sent away is a direct violation of the agencies' obligation for the employment of contract engines. This may be because once an EERA resource is on the incident; fire personnel have no way to easily and definitively identify a resource as EERA. These resources need to be readily recognizable to incident personnel so they can be managed in accordance with their agreements. Recommend that there be a prominent entry in a piece of EERA equipment's resource order that identifies them as such. This should be apparent in the agreement number; evidently it is not. Plans and finance personnel need to be trained to spot this entry upon the equipment's check-in at an incident and made aware of the limitations this type contract places on its employment. Further, the equipment should be identified in t-cards and documentation so plans and resource management personnel would be aware that they should be among the first units to be de-mobbed.
 - b. It is unfair to those who equip and maintain engines in accordance with Chapter 20 and Region One contract specifications as well as to the fire management personnel on an incident to allow EERA equipment on the line that does not meet the same standards for complement and conditions as do contract engines.

Equipment complements and standards on an incident should apply to all. The crews of EERA engines and tenders should have to meet the same standards for training, condition and equipment as required of the contracted engines crew persons, including the crew complement. The 2007 season type six EERA engines only required a crew of two people while the contract engines required a crew of three people. If so, this allowed the agencies to violate their own standards.
31. It is not clear why some private lands are burned and others are not. The policy needs to be explained by fire agencies.
32. When back burns are made there must be all the necessary resources available and if there are not then it should not be done. If the resources are not available and a back burn is allowed then that agency is responsible for the costs to the fires and landowners affected- grass, hay, fences. It gets away.

33. The current program provides a very negligible reclamation effort. Weeds are rarely addressed, reseeded is only done by air which is expensive and the results are questionable. The reclaiming of fire lines, repair of roads, fence reconstruction, and silt and erosion control are rarely finished and in some cases not done at all. Minimal effort is given to see that the work was even done. The obvious conclusion from a landowner standpoint concerning impact to their property is that extensive damage was caused and nothing was done to make it right.
34. Water sources are not developed to provide fill sites for initial attack equipment. Mapping is done poorly or not at all so responding resources are going in blind with no information unless they collect it themselves. Policy requires that any resources that are on the incident engaged in actual fire suppression be stopped and removed even if there are no resources available to take over. When resources finally do arrive they typically arrive on the incident by late morning when fire activity is just picking up making their efforts fruitless. Too much emphasis is placed on air support while ground resources are assigned to secondary objectives.
35. All governmental agencies should include tourism organizations when developing their fire communication plans. Frequently the losses to business are due to an inaccurate public perception of the threats of wildfires. The media tend to over-exaggerate and sensationalize fires, which lead to visitors canceling trips and losses to tourism businesses. Working together we can help to manage the publicity implications by creating unified, consistent, accurate messages giving over residents, our visitors, and the media the information they need while mitigating negative impacts to tourism.
36. It is ironic that the Forest Service and other federal agencies say that fires are normal. If they are normal then allow people to live with fires instead of simply shutting down the state and major areas of the state during fires. It is a matter of risk taking and those who are willing to live with fires and willing to live in this state should be able to not be scared by every fire or shut out of other activities during fire season as long as they follow procedures and guidelines on protecting themselves and others.
37. Type 1 and 2 teams provide emergency medical coverage for their personnel differently. This ranges from having a full paramedic transport ambulance assigned to the base camp or spike camp to having some EMTs with no ambulance. For example the Southwest teams always insist on having paramedics and an ambulance contracted and assigned to the team. The Northern Rockies teams seem to be comfortable with EMTs or some paramedics, but none want to have an ambulance contracted. They seem to be content on dialing 911. Having advance life support medical transport coverage should be one of the highest

priorities when it comes to the type of work our firefighters have to perform. Our statistics tell us that most of the firefighters who die in the line of duty die from heart related events.

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

38. The BIA under a 638 program once funded fire protection program for Northern Cheyenne. Not now. These cuts affect fighting fires as well as other programs such as Hazmat incidents, car extrication, structure fire protection and a variety of other services to help keep our community safe. Currently the Tribe itself owns no fire fighting apparatus. The trucks are the property of the BIA. There is a good core of volunteers and training is kept current. Without any equipment or funding it makes life pretty tough. The counties' equipment needs seem to overshadow the Tribe's.

As far as wildfires are concerned the Tribe is served by the Northern Cheyenne Forestry which is a BIA-run department. They do a pretty good job but they rely on the Tribe for structure protection and occasionally water support. They are paid from 8-5 and sometimes during slow times in the season they are not readily available after hours. During these times we are available and are often called upon.

We often respond to county fires off the reservation, and provide mutual aid to these counties without receiving any compensation.

Basically we need equipment and funding to keep our efforts alive. I feel as a volunteer fire department we are at a disadvantage being on the reservation as we receive no funding from the counties or state and our federal funding has now been cut off.

39. There is no reason that the cost of the fires the last several years could not have been cut down by at least 50%. But until it is clear what the forest service and federal government is fighting fires for and with, the costs will continue to be enormous.

It would be simpler for the state and fed to have grass insurance that is subsidized by the feds and state to pay for the cost to landowners for their grass. Right now it is terrifying to watch the grass burn caused by fires from federal lands that are not being put out.

40. There currently exists no statewide standardized means of facilitating the ordering, dispatching and tracking of local government agency resources. While there are pockets of cooperative mutual aid dispatching, no uniformly effective and standard procedure assures timely notification and response of local agency units on a regional, intrastate or interstate basis. In times of critical need, bureaucratic red tape, archaic pre-response regulations and local preferences delay and inhibit initial attack or compromise support of state and federal units.

In reviewing the orderly dispatching, assembly and response of local agency resources in other areas throughout the western states, several highly proven models are in effect and have proven extremely beneficial in terms of both timely response as well as effective management of interagency resources.

A system established and disciplined in conjunction with regional or zone dispatch/communication centers with immediate access to pre determined agency resources; categorized in conjunction with the ICS kind and type identification system, would assure dramatic improvement in response, coordination and utilization of resources.

Enhancing our expectation to comply with the tenets and principles of the NIMS should be a mandate. For too long our state has been without advocacy to accelerate participation in the Interstate Mutual aid system and the Intrastate Mutual Aid System. Both of which would generate expansion of and benefit of improved operational readiness and deployment.

The existing conflicting layers of often contradictory and arbitrary selection of local government units causes confusion, distrust and undermines interoperability, the essence of the NIMS.

41. While universal acceptance and support has been established for standardized training and qualification (NWCG and NFPA) of personnel, a lack of accountability stemming from administrators without real credibility is a source of valid apprehension on the part of line supervisors. Again, other states have implemented the State initiated and maintained Peer Review Group method of credentialing eligible personnel.
42. The current trend is to blame the skyrocketing cost of fire suppression on residential construction in the wild land urban interface. We are confusing cause and effect when we look at suppression costs in that way. Without a doubt, large sums of money are spent on protecting life and property in the WUI. But the primary risk from those catastrophic wildfires lies outside of the WUI on our public lands. The deplorable condition of our public land resources and the astronomical fire danger that exists there is the real problem. Landowners in the WUI have a definite responsibility to treat their property to minimize wildfire risk

and maximize survivability of their property in the event of a fire. If homes were not in the WUI, private timberlands and ranch lands would be, those lands also have significant a value that s 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 mangers 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.

43. Ranchers and farmers must be informed by both local, state and feds every year what the capacity of fighting fires are and what is expected if a major or minor fire occurs. Landowners need to understand years ahead of what can or cannot be done in fires. There are too many mixed messages by fire management on what can be done on fires. Landowners may have understandings of what fire fighting is and can be done. Landowners also need to be educated as to what can be done to protect their property.
44. The Forest Service can't and won't fight fires to protect property that is not either a home or a structure.
45. If a fire is attacked in the first 10-20 hours, the success rate in containing the fire is around 97%. The crews are that are used to do this are termed "I-A initial attack crews" and they are extremely efficient and well trained. Aerial fire suppression is also a very effective tool at this time. Unfortunately only 1 ½% of the aircraft that are thought to be available at any one time is operational.
 - a. There are various reasons and opinions why the fires are uncontrollable from this point on. One prevalent opinion is that fires have in the past, until twenty five years ago been put out early, thus increasing the amount of fuel left in the forest. This was the thinking that led to the let it burn policy that has been in effect since then. This has proven to be not quite valid assumption as some of the Montana and Idaho fires, during the past two years, have been over areas that were burned in the previous 20 years. The reality is that the extended drought and heat of the last few years has dried out the re growth brush and grass that has grown back after the initial fires. This has become a dangerous source of potential fuel in itself in these dry years.
 - b. The above items notwithstanding, there are several more reasons that fires are not being controlled after the initial attack phase. The next type of classification for fire control and suppression is called "the extended attack phase". Over the past twenty years or so, in an effort to control costs, the Forest Service has steadily reduced the numbers of in house full

time fire fighters and supervisors. They now rely on outside fire crews and fire trucks, both structural and wild fire types. Supervisors are recruited from among former forest service employees with previous fire fighting experience. Crews that are hired to fight fires do have to be certified by the forest service. That is where a problem arises; some of the crews are well qualified and well supervised, while others are not. There are some independent crews are in large part more of a danger to themselves and those around them, than they are useful in the actual control of wild fires. The structural crews would appear to be somewhat more competent; it was indicated by people with extensive fire management experience, that they would be comfortable with, at the most 65% of the trucks and their crews that are supplied to them. It is also interesting to note, that by far, the largest amount of funds expended on fire suppression in the wild fire arena are spent on these extended attack resources. There is also a big shortage of qualified supervisors personnel available. Many fire trucks are hardly ever utilized but they are apparently there just in case.

- c. The shortage of experienced supervisors is due to several factors. The first is that at the time that the forest service reduced the number of full time fire fighters a like reduction in supervisors was made. For many years these people were then available for hire as private contractors during the fire season. However, as will all people these people grew older and no longer wanted to do this type of work. Another factor that comes into play is the liability factor. If something goes wrong in a fire operation, the blame can be shifted onto the supervisors and away from the forest service. Contract employees do not have the immunity from prosecution enjoyed by government agencies; supervisors have been held liable for both loss of life and loss of property and thus many qualified people do not want to assume the risk. The forest service has also responded to these situations in their own way. People were lost fighting fires in areas where there was fuel for the fire so crews were no longer used to build fire lines in areas where there is fire fuel except for back burning. Wild fires lay quite dormant during the night and early mornings due to lower temperatures and higher humidity and this is the ideal time to try to control them. However, there have been people killed and injured fighting fires at night so this is not now an allowable option.
- d. If fires are not controlled at the very beginning, then they are impossible to manage due to the present fuel conditions in our wild lands and the worker safety restrictions now in place.
- e. The money spent on the extended attack plan to protect private property other than structures is a complete waste.

- f. The bulk of the resources available on a particular fire are used to protect structures and homes or cabins. No attempts are made to contain the fire to forest service lands. Indeed private property is sacrificed to control the fire and free up resources for structure protection. There is no insurance to protect grass, trees of wild life habitat, fences and water tanks.
 - g. Fire retardant drops while spectacular are almost useless and are nothing more than public relation displays unless used in the initial attack phase. The funds and resources spent during this phase would be better spent on such endeavors as thinning, fuel control projects, and compensation to adjacent landowners for damage due to unchecked fires.
 - h. Landowners who border public lands can be held responsible for fire fighting costs arising from fires that are allowed to spread onto public lands from private holdings There is no reverse liability here. The Forest Service is not liable for damage caused to private property from fires originating on public ground, whether or not any measures to control the fire were used.
 - i. Another point to be made is that the level of priority that wild fires have varies from national forest to national forest. It would seem that the farther one is removed from southern California, the lower the priority that is given to fire prevention and control.
46. The people of Montana are not getting much bang for their buck when an interagency fire agreement with the federal government is signed.
 47. Federal agencies need to recognize the importance of coordinated pre planning. This has a high priority especially in counties like Beaverhead.
 48. We need to continue to provide both technical and financial assistance to private landowners to assist them to treat fuels around their property and homes. The goal would be a structure that could survive a wildfire without significant human intervention. At the same time, landowners need to understand and accept the risk of losing their home and property if they do not take personal responsibility for its protection. Building cooperatives with existing outreach organization such as the Montana Tree Farm System, Montana Forest Stewardship program, DNRC Forestry, and local fire departments would be the most efficient manner to distribute technical and financial aid. How much money is necessary for this?