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Testimony of

Kirk Rowdabaugh, State Forester of Arizona

on behalf of

**The Western Governors' Association,
The National Association of Counties,
The National Association of State Foresters and
The International Association of Fire Chiefs**

Controlling Wildfire Suppression Costs

**Committee on Energy and Natural Resources
United States Senate**

January 30, 2007

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Thank you Chairman Bingaman for the opportunity to appear and present testimony at today's hearing on wildfire cost issues. This testimony is presented on behalf of the Western Governors' Association. WGA is an independent, non-partisan organization of Governors from 19 Western states and three U.S.-Flag Islands in the Pacific. WGA is very pleased to present this testimony on behalf of the National Association of Counties, the National Association of State Foresters and the International Association of Fire Chiefs.

Governor Mike Rounds of South Dakota is currently WGA's Chairman and Governor Janet Napolitano of Arizona is WGA's Lead Governor for Forest Health. WGA has long-standing policy that it has pursued with the Administration, the Congress and other partners to prevent fire suppression costs from overwhelming proactive forest health and cost-control efforts.¹

¹ WGA Policy Resolution 06-9, *Improving Forest and Rangeland Health in the West*. "The active management and restoration treatments called for in the 10-Year Strategy will require substantial investment by all levels of government and private citizens if the agreed-to goals are to be achieved. The Administration should request and the Congress should provide funding to fully implement the 10-Year Strategy while ensuring that proactive fuels reduction funds are not sacrificed in years of high suppression costs. By using proactive approaches to reduce hazardous fuel, to restore ecosystems and to increase the capacity of our communities to assist, this nation can eventually reduce loss of life and property from wildfire catastrophes while lowering the tremendous suppression costs that are incurred. In addition, complete funding for the Forest Service's S&PF budget is a vital part of allowing State Foresters to work across landscape boundaries to maximize forest health treatments efforts. Finally, Western Governors fully support implementation of the recommendations of the WGA-Chaired Strategic Panel for Fire Suppression Costs and believe they can eventually lead to additional control over wildfire suppression costs." See <http://www.westgov.org/wga/policy/06/ForestHealth.pdf>

USDA's Inspector General's Cost Recommendations

I will discuss proactive forest health and cost control efforts more fully below but want to begin my testimony by addressing the United States Department of Agriculture Inspector General's Audit that was released in November 2006.² The audit provides a critical examination of the costs to the Forest Service for suppressing large wildfires.

The audit contains certain useful and overdue recommendations that are consistent with WGA policy and which we urge the federal agencies to implement. The Forest Service and the Department of the Interior should make wildland fire use a large part of their arsenal of tools to reduce hazardous fuels. If appropriately managed, wildland fire use can safely improve forest health at low-cost while preventing future hazardous fuel driven wildfires that greatly increase costs. Furthermore, the federal agencies should establish controls to assess the performance of line officers and incident commanders in controlling costs. The Congress should encourage action by the federal agencies on these recommendations.

However, there are certain items in the audit that are of great concern to Western Governors, county commissioners, state foresters and fire chiefs and we want to make the Congress aware of these concerns. The Inspector General recommends that the Forest Service seek clarification from Congress on

- 1) the responsibilities of both the Forest Service and States in protecting wildland urban interface (WUI) developments and other private properties threatened by wildfires, and
- 2) the need to renegotiate WUI protection responsibilities in master protection agreements to ensure the fire fighting costs for WUI protection are equitably and appropriately allocated between federal and non-federal entities.

The Forest Service has indicated it will attempt to determine if Congressional intent already exists in current laws regarding WUI protection responsibilities. If it does not, the Forest Service has previously stated its intention to seek clarification from the Congress regarding protection responsibilities in the WUI and on other private properties that are threatened by wildfires.

We are disturbed by the apparent uncertainty of federal authorities for their responsibility in managing wildfires on the national forests. We fail to understand federal confusion on this point as the Forest Service Manual clearly directs the agency to protect valuable natural resources, recreational facilities and WUI infrastructure of the National Forests. Indeed, the federal responsibility to prevent fires that burned on federal lands from burning adjacent non-federal lands is clear.

Should the Forest Service seek clarification from Congress of its responsibility for wildfires burning on the national forests, we encourage Congress to solicit state and local

² <http://www.usda.gov/oig/webdocs/08601-44-SF.pdf>

government and other perspectives on this important matter. If necessary, Congress should conduct a fully informed and complete assessment of the cost issues that relate to wildland fires that: (1) originate and burn solely on federal land, and, (2) those that originate on federal land and then escape from federal lands onto neighboring state and private lands.

We strongly believe that state and local governments should not be expected to share the costs of suppressing wildfires that burn entirely on federal lands. However, if a federal agency takes aggressive suppression action on a wildfire that originates on federal land and later spreads onto non-federal land, a cost-share agreement with state or local governments is appropriate.

We also urge the Congress to provide prompt and unambiguous direction to the federal agencies regarding their responsibilities for the management of the national forests, including the need to control wildland fires before they are allowed to imperil the lives or properties on neighboring private lands, or valuable natural resources on neighboring state lands. The demands of the upcoming fire season require that both state and federal responsibilities are exceedingly clear to ensure our rural communities receive the protection they deserve from fires burning on federal lands.

The Strategic Issues Panel on Fire Suppression Costs

The Department of Agriculture Inspector General's report makes clear its belief that increased suppression expenses in recent years are linked to growth of the WUI and the increased fire protection responsibilities that come with that growth. Effective fire suppression actions are certainly made more complex and difficult when wildland fires threaten private developments. Fires in the WUI can cost more than average fires.

The Inspector General, however, appears to have failed to evaluate or consider some of the most current research and recommendations on the causes of fire suppression cost increases, and more importantly, the means to address them. In 2004, on behalf of WGA, I co-chaired the Strategic Issues Panel on Fire Suppression Costs that was formed by the Wildland Fire Leadership Council (WFLC). WFLC is co-chaired by the Department of Agriculture and the Department of the Interior. Many of the foremost federal and non-federal experts on the topic produced a report entitled "Large Fire Suppression Costs – Strategies for Cost Management" which was endorsed by Western Governors and the WFLC. Western Governors provided testimony on this cost control review to the Public Lands and Forests Subcommittee of this Committee in 2005.³

³ See Testimony of James Caswell, Office of Species Conservation, State of Idaho and Kirk Rowdabaugh, State Forester of Arizona (Co-Chairmen, Strategic Issues Panel on Fire Suppression Costs) on behalf of the Western Governors' Association before the Subcommittee on Public Lands and Forests of the United States Senate Committee on Energy and Natural Resources, April 26, 2005.

<http://www.westgov.org/wga/testim/costpaneltest4-26-05.pdf>

The Strategic Issues Panel found that fire suppression expenditures are overwhelmingly centered on larger fires, whether in the WUI or not. Rigorous statistical analysis of Forest Service data showed that from 1980 through 2002 small fires (less than 300 acres) managed by the Forest Service were 98.6 % of all the fires but represented only 6.2% of all suppression expenditures. Larger fires (greater than 300 acres) represented only 1.4% of the fires but a whopping 93.8% of all suppression expenditures.

Total suppression expenditures are strongly correlated ($R^2=0.76$) with total acreage burned, i.e., large total expenditures are associated with large acres burned. In fact, two of the most expensive fires to control in the history of the Forest Service, the 175,000-acre Tripod Fire (2006) and the 500,000-acre Biscuit Fire (2003) both burned in very remote locations. The \$82 million and \$150 million, respectively, it cost to control these fires was insignificantly related to WUI protection.⁴

The Strategic Issues Panel recommended seven primary actions to contain federal fire suppression costs. The first recommended action, to increase the level of accountability for large fire costs and their impacts by allocating suppression funds on a regional or equivalent basis was intended to provide incentives to federal agency administrators for controlling costs. It was this single recommendation that the Panel believed would provide the greatest cost savings to the federal government because wildfire costs are driven by management decisions on the ground.

It is our understanding that the federal agencies have not sought to implement this recommendation because they believe Congressional authority is required. We believe very strongly that cost controls can be achieved, in part, by full implementation of all the recommendations of the Strategic Issues Panel.

The Inspector General's audit fails to make these recommendations a priority for the Forest Service and instead infers that cost shifting to states, local governments and others is a solution to spiraling suppression costs. Cost shifting is not a solution but rather a misguided effort to pass the buck on costs when the agencies themselves have not taken all the practical steps necessary to control them. We again urge the Congress to take whatever steps are necessary to ensure the federal agencies make the Panel's recommendations a reality.

The 10-Year Comprehensive Strategy and Cost Control

The Western Governors' Association recently agreed to an updated Implementation Plan to the 10-Year Comprehensive Strategy "*A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment.*"⁵ The Strategy was requested by the Congress in 2000. Since then, the Strategy and its Implementation Plan have formed the basis for forest health efforts across the nation and significant progress has

⁴ "Large Fire Suppression Costs, Strategies for Cost Management," A Report to the Wildland Fire Leadership Council from the Strategic Issues Panel on Fire Suppression Costs at 9 (August 26, 2004).

<http://www.fireplan.gov/reports/2004/costmanagement.pdf>

⁵ <http://www.westgov.org/wga/publicat/TYIP.pdf>

been made on the ground in using locally driven collaboration and in undertaking landscape level planning and treatments. The Congress adopted the collaborative approach developed in the Strategy in its Healthy Forests Restoration Act of 2003.

The need to develop a revised implementation plan was anticipated in the text of the first plan. Moreover, the actions items agreed to in the first plan that the Governors signed with the Secretaries of the Interior and Agriculture in May 2002 have, for the most part, been completed. At the urging of WGA's Forest Health Advisory Committee, which conducted a review of the original plan in 2004, the Governors updated the plan with the federal agencies, counties, state foresters, fire chiefs and stakeholders. The goals of the plan remain the same as in the 10-Year Strategy. A collaborative approach needs to be used to:

- Improve Prevention and Suppression of Wildfires
- Reduce Hazardous Fuels
- Restore Fire-Adapted Ecosystems
- Promote Community Assistance

The new Implementation Plan puts additional emphasis in the following areas:

- information sharing and monitoring of accomplishments and forest conditions to improve transparency;
- a long-term commitment to maintaining the essential resources for the plan;
- a landscape-level vision for restoration of fire adapted ecosystems;
- the importance of using fire as a management tool; and
- continuing improvements in collaboration.

The new Implementation Plan was endorsed and sent to the Congress by WGA, the Secretaries of the Interior and Agriculture, the National Association of Counties and the National Association of State Foresters in December 2006.⁶ What continues to be highly notable about the 10-Year Strategy is the contribution of expertise and endorsements from WGA's 60-person Forest Health Advisory Committee. These individuals are listed in Appendix C of the plan and they are some of the preeminent national experts on fire fighting, forest health treatments before and after fires and on how small communities need to play a role in this effort. They range from fire chiefs to timber industry professionals, from environmentalists to university professors.

When fully implemented, the 10-Year Strategy and the new Implementation Plan will use proactive measures to improve the health of our forests to prevent catastrophic wildfires. These efforts require cross-boundary work, full involvement of states and stakeholders, and, most importantly, a long-term commitment of time, resources and manpower. It is large fires that at great speed eat up the resources appropriated for suppression. So full implementation, with adequate funding, of all four goals of the 10-year Strategy is a wise and economical cost-containment strategy. It is substantially cheaper to thin forests and

⁶ <http://www.westgov.org/wga/press/tyip12-6-06.htm>

protect communities in advance than to put out fires and repair the damage from them after the fact.

Some specifics from the new Implementation Plan under each of its goals demonstrate the path forward that will help the nation get ahead of the tremendous escalation in fire suppression costs.

Goal 1 – Improve Fire Prevention and Suppression

Performance under this goal will be measured by the federal agencies based on the percent of wildfires controlled during initial attack and the number of unwanted human-caused wildfires. Using a stratified cost index, the agencies will also examine what percent of fires not contained in initial attack exceed the index. The key action item under this goal is full implementation of the cost control recommendations of the Strategic Issues Panel discussed above.

Goal 2 – Reduce Hazardous Fuels

Proactive management of the hazardous fuels in our forests is key to reducing the severity and number of uncontrolled and costly wildfires. Fuel treatments can be most economically and effectively carried out if a collaborative approach to plan and implement large-scale treatments across the landscape (federal, state, tribal, and private land ownerships) is utilized. By using collaboration, those acres most in need of treatment because of their condition or location will be accurately identified. Community Wildfire Protection Plans (CWPPs) as called for by Congress in the Healthy Forests Restoration Act are the instrument for expressing the collaborative public will. The performance measures and tasks in Goal 2 of the new Implementation Plan push federal and state land managers toward treatment of the acres most in need of treatment as identified in CWPPs. The new plan will also provide necessary information on the effectiveness and cost of fuel treatments.

Performance under Goal 2 of the new plan will be measured as follows:

- Number and percent of WUI acres treated that are identified in CWPPs and the number and percent of non-WUI acres treated that are identified through collaboration consistent with the Implementation Plan.
- Number of acres treated per million dollars gross investment in WUI and non-WUI areas.
- Percent of collaboratively identified high priority acres treated where fire management objectives are achieved as identified in applicable management plans or strategies.

The action items under Goal 2 of the plan are designed to educate land managers, the public and the Congress on the value and effectiveness of fuel treatments. There are a number of questions in this regard that collaborative teams will answer. Some examples include: What information from federal land management databases such as LANDFIRE can be made public so we all can understand if a fuel treatment made a significant

difference or if it was conducted over multiple land ownerships? Can we develop measures that help us determine the degree and longevity of fire hazard reduction achieved by fuel treatments? How do we determine when a fuels treatment meets the objectives of its plan and what data sources are available to inform the determination? Once these and other efforts are completed, we should all understand how to make the hazardous fuel treatments tool more precise, more effective and more valuable. Most importantly, collaboratively targeting this tool at the strategic acres most in need of attention will positively impact the nation's suppression expenses.

Goal 3 – Restoration and Post-Fire Recovery of Fire-Adapted Ecosystems

The most significant objective of this goal is that it will lead to an increase in wildland fire use; an extremely economical method of undertaking hazardous fuels treatments and reducing suppression costs if appropriate planning and monitoring are undertaken. For example, the federal agencies will now be measuring and reporting how many acres each year are being identified using the collaborative model and treated using wildland fire use or other fuel treatment methods. Action items include:

- Analyze and recommend improvements to policies, incentive structures and personnel capacity issues that are barriers to wildland fire use, mechanical treatments and prescribed fire.
- Develop and implement a substantial public education campaign that emphasizes fire's role in ecosystems and the benefits of fire management to ecosystems and public health and safety. This initiative will complement Smokey the Bear's message of fire safety.
- Add information to a revision of the Community Wildfire Protection Plan Handbook⁷ so that communities can consider restoration and wildland fire use when developing CWPPs.
- During amendments, revisions or updates of federal land and resource management plans and fire management plans, ensure those plans consider and incorporate wildland fire use objectives consistent with the 10-Year Strategy and other federal policies.

These action items will set the stage for an increase in wildland fire use. If planned for and carefully monitored, wildland fire use is a safe and effective means of reducing hazardous fuels and reducing fire suppression costs.

Goal 4 – Promote Community Assistance

A significant part of controlling fire suppression costs is promoting and reinforcing individual landowner responsibility for wildfire protection as well as improving local fire department capacity and training. The new Implementation Plan sets up a number of measures and action items to enhance safety by engaging WUI communities. For example, the new plan will measure the following:

⁷ <http://www.safnet.org/policyandpress/cwpp.cfm>

- Number and percent of communities-at-risk covered by a CWPP that are reducing their risk from wildland fire. A community is at reduced risk if it has satisfied at least one of the following requirements:
 1. Recognized as a FIREWISE community or equivalent, or
 2. Enacted a mitigation/fire prevention ordinance, or
 3. High priority hazardous fuels identified in a CWPP or equivalent are reduced or appropriate fuel levels on such lands are maintained in accordance with a plan.
- Percentage of at risk communities who report increased local suppression capacity as evidenced by:
 1. The increasing number of trained and/or certified fire fighters and crews, or
 2. Upgraded or new fire suppression equipment obtained, or
 3. Formation of a new fire department or expansion of an existing department involved in wildland fire fighting.

Two action items in Goal 4 are intended specifically to aid WUI communities in planning and protecting themselves in advance of fire. One calls for developing a publicly accessible database of local zoning ordinances and state planning efforts that have successfully reduced land owner risks associated with wildland fire. This information would, among other things, be used to develop model CWPPs and wildfire ordinances. The other action item would provide improved technical assistance for at-risk communities to develop or update their CWPPs. Should resources be obtained, the National Association of Counties, the National Association of State Foresters and the International Association of Fire Chiefs would be well positioned to provide expert leadership for these respective initiatives.

Overall 10-Year Strategy Goal - Collaboration

The specific measures and action items in the new Implementation Plan for the 10-Year Strategy will contribute substantially to wildfire cost control. Yet, it is the collaborative nature of the entire Strategy that is essential to success on the ground and in the budget. The Strategy brings together all the essential partners to help the nation proactively get ahead of the wildfire threat and reduce the costs of suppression we face each season. All levels of government from local fire fighters, to county commissioners to Governors to Secretaries are engaged. The breadth of support for the Strategy and the new Implementation Plan from non-governmental stakeholders is extremely broad and diverse. All of these parties have a role to play in implementing the plan and ensuring its objectives are met.

The Congress and the Administration need to recognize the consensus that has been constructed, the cost control aid these measures and action items can provide, and move

with all deliberate speed to fund and fully implement the recommendations. Western Governors ask the Congress to reaffirm the importance of this collaborative, proactive and forward thinking 10-Year Strategy that Congress called for in 2000.

The Congress should direct the federal agencies to make implementation of the new plan among its highest priorities. Due diligence to comprehensively and collaboratively accomplish all four goals of the Strategy should be required. Restoration and Community Assistance are no less valuable in contributing to forest health and cost control than are Reducing Hazardous Fuels and Improving Prevention and Suppression. These are interrelated objectives and should be treated as equal priority items if the Congress and the Administration are of a mind set that they desire to seriously address fire suppression cost control at this time.

Re-Cap of WGA, NACo, NASF and IAFC Views on Congressional Cost-Control Actions

USDA Inspector General Audit Report –

- 1) Encourage federal agency action that increases their ability to safely use wildland fire for hazardous fuel reduction and restoration purposes.
- 2) Encourage federal agencies to establish controls to assess the performance of line officers and incident commanders in controlling costs.
- 3) Solicit state and local government and other views should the Forest Service seek clarification of its wildfire suppression responsibilities.
- 4) If necessary, conduct a fully informed and complete assessment of cost issues related to wildland fire on public lands.
- 5) Promptly provide unambiguous direction to federal agencies regarding their responsibility to manage public lands and prevent wildfires that originate therein from imperiling the safety, land and property of other landowners.

Strategic Issues Panel on Fire Suppression Costs –

- 1) Take whatever steps are necessary to provide authority and assist the federal agencies to ensure they fully implement the cost control recommendations of the Panel.

10-Year Comprehensive Strategy –

- 1) Reaffirm the importance of this collaborative, proactive and cost-controlling Strategy that Congress initiated in 2000.

- 2) Direct the federal agencies to make the new Implementation Plan of the 10-Year Strategy one of their highest priorities.
- 3) Direct the federal agencies to make collaboration and each of the other four goals of the Strategy -- Improve Prevention and Suppression, Reduce Hazardous Fuels, Restore Fire-Adapted Ecosystems and Promote Community Assistance -- of equal priority for accomplishment.

Western Governors appreciate this Committee's consideration of our views on this vitally important topic. We will continue to work with you and the federal agencies to improve the health of our forests and control fire suppression costs.

The Forest Service Budget and Leadership Transition

Preliminary information indicates the 2007 wildfire season will be a challenging one for the federal agencies responsible for wildfire protection. This challenge will present itself not only in terms of fire intensity, but also in terms of cost. Predictions already point to a suppression cost crunch mid-season.

This is not a new phenomena or trend. Continuing droughts, climate change and overly dense stands of trees and wildfire fuels point to continued suppression cost increases. At the same time, the Forest Service is trying to address other critical national issues such as invasive species, energy development and recreation pressures on our National Forests. In the face of these immense challenges, the Forest Service has faced an essentially flat budget since 2001.

As we have detailed in this testimony, we believe there are substantial steps the Forest Service and Department of the Interior can take to control suppression costs. At the same time, the Congress needs to carefully consider and find a way to increase the budget resources dedicated to fire and forest management activities provided to the federal wildland fire agencies given the growing responsibilities that the Congress and the nation entrust to them.

Before closing, we would also like to take a moment to acknowledge the leadership change at the Forest Service. Chief Dale Bosworth will be officially retiring from the USFS in just a few days after forty-plus years of service to the agency and the country. We thank him for his service and his six years as Chief during a period that has proven to be quite momentous for the agency. Chief Bosworth has been a strong partner with us in establishing the 10-Year Strategy, implementing stewardship contracts and developing Community Wildfire Protection Plans, among other initiatives.

We are also pleased with the selection of the new Chief, Gail Kimbell, the first woman to lead the Forest Service. Ms. Kimbell's track record shows an understanding of collaboration and community involvement. We believe these will serve the agency well as it re-commits itself to the 10-Year Strategy and a strong partnership with state and local government.

Mr. Chairman, thank you again for this opportunity to present the views of the Western Governors, county commissioners, state foresters, and fire chiefs.

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