

Thank you for the opportunity to testify at this important hearing on the fate of our forested communities and our National Forests. It is an honor to appear before you, and I hope that my comments will move us forward in our effort to understand the relationship between forests, wildfire and communities.

I am the Director of The Lands Council, a conservation organization based in Spokane, Washington. I am also President the National Forest Protection Alliance - that, together with over 130 conservation organizations, and nearly a hundred members of the U.S. House of Representatives advocates for the restoration of our National Forests by passage of the National Forest Protection and Restoration Act.

I'm here because I think we can move quickly and protect America's communities from wildfire.

I'm here to ask that at-risk communities in the forest be a priority in legislation.

In the past week we have all read about the unfortunate loss of homes and property on Mt. Lemon, near Tucson, Arizona. The fact that the Aspen Fire started so close to the Summerhaven community, and not miles away in the backcountry, emphasizes the need to conduct fuel reduction projects where they are needed most - near homes and communities.

On December 31, 2002 the Arizona Daily Star reported that Summerhaven wanted a 1/4-mile buffer around the community, but the Forest Service said it did not have the \$1 million necessary to do the work. The Fire Department was asking for donations to buy a wood chipper and burner for \$60,000 so the village can more easily dispose of dead and downed wood.

Bill Hart, fuels management specialist for the Santa Catalina Ranger District of the Coronado National Forest, agreed the money is not enough. "We had an allocation of \$120,000 last year," Hart said. " We had to beg, borrow and steal to get \$50,000 more." Hart said \$1 million worth of "treatment" projects are planned but at current spending, it will take a decade to do them.

The FS has proposed some good prescribed burning and a couple of thinning projects recently on the mountain. They have not been controversial and there has been no resistance from conservation organizations. One of the projects which was closest to the fire area was proposed in October 2001 and has been stalled since (the "Red/Bear/Soldier Fuel Reduction" project.) This was a WUI (Wildland Urban Interface) project with upper diameter limits of 9 inches, followed by prescribed burning. According to the latest Forest Service calendar, "project implementation is on hold because of lack of funding."

The Summerhaven fire is a powerful warning that national fire policy must emphasize the importance of reducing the risk of fires immediately around communities, and not spend precious dollars deep in the backcountry far from where people live. When the house is burning you don't water the garden.

We know that forest fires will always be with us they are an integral part of the West, just like rain and sunshine. Historical data from the National Interagency Fire Command (NIFC) shows

that an average of 20 million acres burned each year in the early part of the century - before the advent of modern fire suppression. Last year about a third of that historical average burned.

There is a mythology put forward by some that our forests consisted of widely spaced trees that had gentle ground fires come through every few years. But historical documents and photos prove them wrong. Documents from explorer John Fremont in the Blue Mountains of Oregon and US Geological Survey reports from Idaho describe thick forests with thousands of small trees per acre, thick deadfall and dense stands of fir and pine. New research from southern Idaho indicates even Ponderosa pine forests experienced hot, stand replacing fires.

The implication of this historical data is that our forests evolved with fire, the dozens of fire dependent species, from black backed woodpecker to western larch lend evidence that Western forests depend on fire. But now we have several million people living in the path of these fires, and the effect of recent droughts and wildfires can no longer be ignored. The implications for communities in these fire adapted forests are that we either take key steps to protect them or we face the risk of more Summerhaven's. We can't and shouldn't fireproof our forests, but we can work toward fireproofing our communities.

The Healthy Forest Initiative is the right name but the wrong solution. The facts show that only 20% of the acres burned in the past 12 years were on National Forests - but this legislation puts all of the projects on federal lands, often far away from communities at risk. The question is how do we best protect people, homes and communities? There is universal agreement that making homes FireWise and creating a defensible space around communities will dramatically improve homeowner and firefighter safety. We need to put first things first and move forward together to protect communities.

THE LANDS COUNCIL WILDFIRE EDUCATION PROGRAM

In 2001, The Lands Council received a grant from the U.S. Forest Service to work in northeast Washington, assisting rural communities with reducing wildfire risks, both through education and technical planning assistance. Since then we have provided workshops in rural communities on 'defensible space', we have advertised free defensible space planning through newspapers, radio stations, county mailings and door-to-door rural outreach and we have written 'Home Survivability Plans' for homes in these areas. In addition, we have developed educational handouts on what defensible space is and why it works, what types of roofing, decking and window construction materials are fire-resistive and how to landscape with fire-resistive plant species in our region.

Our program is based on the belief that by working with rural residents we can create communities that have the ability to survive wildfire. Communities that are better prepared for fires also offer a safer and more effective working environment for firefighters. With the protection of private property and communities, public land managers can then make better decisions about wild- and prescribed fire on public lands, providing the opportunity to save money in firefighting costs and do a better job in restoring the health of public lands.

Our outreach is based on fuels reduction planning and education in rural communities as described in the National Fire Plan (NFP) and follows the protocol of the National FireWise

program. Our program utilizes federal and state science & information including research done by Jack Cohen and the Pacific Wildfire Coordinating Group.

We partner with the Forest Service, Washington Dept. of Natural Resources (WADNR) and local agencies and organizations in efforts to promote defensible space and the work associated with it. To date we have provided door to door education to over 1500 residents in northeastern Washington, and written over 120 individual home fire plans, which the WADNR has implemented.

This spring The Lands Council began a community fire planning effort for the Chewelah, Washington watershed, in partnership with the Colville Community Forest Coalition. We are working with agencies and community leaders to write a community wildfire protection plan that will encompass federal, state, and private lands within the watershed. The Lands Council is taking a lead role in this effort, but we know the success of this effort is to engage all members of the community.

Some claim that the wildland urban interface isn't where the forest health issues start or that we shouldn't help private property owners. They claim that the real wildfire danger is in the backcountry - "that's where the fires start" - and that's where forest-thinning funds should go.

I believe this is a failed approach. At a time when we urgently need to focus on protecting homes, we cannot afford proposals that squander scarce resources on questionable projects far from where people live in an effort to log the backcountry to bring down the biggest, oldest, and most fire-resistant trees. Especially when budgets are so tight, we need to focus work and spending where they will do the most good - near homes and communities.

I want to give two specific examples where scarce federal dollars are being wasted in the backcountry. First, the Iron Honey project in North Idaho - where 1400 acres of clearcuts are planned, is deep within the Idaho Panhandle National Forest (IPNF), far from any homes or communities. This is purportedly to reduce fuels and restore the forest but the agencies own experts know that further canopy removal intensifies spring flooding and late season water shortages in this heavily logged watershed. At the same time, the IPNF is doing little to protect the city of Coeur D'Alene and Hayden Lake, even though Forest Service boundaries are within a few hundred feet of homes in those communities.

Second, the just released Cove Project, on the Vale BLM district in eastern Oregon. The Vale District is focused on community protection and has supposedly done a risk assessment to prioritize communities where fuels reduction is needed. The result: the project would log large units several miles from the community of Cove, while leaving areas adjacent to the community untreated. It's a timber sale masquerading as community wildfire protection.

Are there any good projects by these agencies? Yes, the Colville National Forest in northeastern Washington last year completed the Storm King Fuels Reduction Project, which treated areas along private land boundaries. Also on that Forest the Quartzite project is worth mentioning because it started out as a typical timber sale that would have logged and roaded a 5200 acre roadless area. After extensive participation by The Lands Council and Kettle Range Conservation Group, a nearby ski area owner, and dozens of nearby residents, the project was

modified to focus on the Wildland Urban Interface. While still not perfect, Forest Supervisor Nora Rasure, made a Decision that protected the roadless area and treats the wildland urban interface. This project was not appealed.

What do the Western Governors think?

Just last week the Western Governors met in Missoula, Montana. Western Governors understand that wildfires are a fact of life across the West. That's why they met last May to work on a ten-year wildfire plan that reinforces the fundamental principle that resources for wildfire protection should focus on where they make the most difference: in the Community Protection Zone.

The Governors know that public participation and government accountability are keys to success. Nowhere in the Governors' plan is there any mention of changing environmental safeguards or restricting the public appeals process. I believe most of the Governors understand that attempts to reduce public participation and accountability distract from the crucial work of protecting homes and lives.

Science, common sense, and consensus should guide wildfire policy. Last year, the Western Governors brought together a broad range of experts - professional foresters, federal fire-fighting agencies, and conservationists - and they agreed on the importance of focusing wildfire prevention work near homes.

Expert scientists are clear on this point: We can dramatically improve homeowners' safety by making homes FireWise and clearing flammable brush and trees from nearby communities. We have the know-how and tools to help protect homes. Rather than squander precious dollars on questionable tactics, let's help local governments, fire departments and communities stay safe. Let's invest the money where it's needed and where it will protect the most homes and lives.

Some will claim that burdensome regulations prevent necessary work from being done and that red tape drives up the cost of projects. A May 2003 General Accounting Office report found that of 762 Forest Service fuel reduction projects, 95% were ready for implementation within the standard 90 day review period and 97% proceeded without litigation. These numbers hardly support claims of "analysis paralysis. Eliminating public process and environmental laws may help the timber industry cut trees in the backcountry, but it will do nothing to help the communities at risk

We have all the tools needed to protect homes and communities from wildfire, and no regulations are stopping homeowners or communities from protecting themselves. What we do need to do is roll up our sleeves and work together to help homeowners protect their homes and clear space immediately around their communities. Congress can help by directing needed resources to those communities.

As we have just seen with Summerhaven, putting off work near communities so that the timber industry can log in the backcountry will only delay the time that communities must wait before they receive needed assistance. All experts, including the Forest Service, agree that Forest Service timber projects lose taxpayer dollars year after year. The Healthy Forest Initiative is a

diversionary tactic that fails twice over. First, it won't provide any extra financial assistance to communities. Second, it diverts attention to the backcountry instead of where the major focus must be concerning wildfire issues - first protecting homes and lives.

While the discussion of how to restore historical processes in our National Forests continues, and should be driven by science and not hysteria, the methodology for protecting structures and communities is well advanced. Jack D. Cohen, US Forest Service Fire Researcher, Missoula, Montana, has done considerable home defensible space research. Two of his key findings are:

Research indicates that effective residential fire loss mitigation must focus on the home and its immediate surroundings. This research indicates that home losses can be effectively reduced by focusing mitigation efforts on the structure and its immediate surroundings.

Extensive wildland vegetation management does not effectively change home ignitability. The evidence suggests that wildland fuel reduction for reducing home losses may be inefficient and ineffective. Inefficient because wildland fuel reduction for several hundred meters or more around homes is greater than necessary for reducing ignitions from flames. Ineffective because it does not sufficiently reduce firebrand ignitions.

Based on Cohen's research and the National FireWise Program, I believe that the following steps should be taken to protect rural communities from wildfire:

1. Support community protection by requiring that fuels reduction projects be concentrated to the Community Protection Zone - defined as 60 meters from an individual inhabited structure to protect the home ignition zone and up to 500 meters from a community's inhabited structures -- to provide community and firefighter protection. Government research has found this is the only proven method to protect homes and communities.
2. Direct at least 85% of the National Fire Plan hazardous fuels budget to grants for states and funding to local communities to provide funds to ensure community and homeowner protection in the Community Protection Zone. Research has shown that 85% of the lands within the Community Protection Zone are State, tribal, county and non-industrial private lands.
3. Acknowledge that logging, and the residue left behind as slash piles increases the risk of severe fire. Our extensive road system (over 400,000 miles at last count, on National Forest alone) adds to the problem since most fires are human caused and start near roads.

Will the Healthy Forest Initiative Help Communities and our National Forests?

In contrast to sensible community protection and critical public participation, the "Healthy Forests Restoration Act of 2003 (HR 1904) will:

1. Not Ensure Any Increased Protection for Communities: HR 1904 does not include any specific measures to protect homes or communities. It is also inconsistent with the Western Governors' Association 10-Year Comprehensive Strategy, which does not call for any changes in existing laws. The only proven method to protect homes and communities is to reduce flammable materials in the immediate vicinity of structures, yet the definitions in H.R. 1904

would not require any activities to be near homes. Instead, the bill seeks to further subsidize the timber industry and eliminate obstacles to logging large, fire-resistant trees miles away from the nearest home. The country's top forest scientists, including the Forest Service's own scientists, have found that this kind of logging can actually increase fire risk and make fires larger and more intense.

2. Cut the Heart out of NEPA (National Environmental Policy Act). HR 1904 allows the Forest Service to conduct large-scale, environmentally damaging logging projects without considering any alternatives or allowing for meaningful public input during project development. HR 1904 eliminates the statutory right of citizens to appeal Forest Service logging projects.

3. Interfere with the Independent Judiciary. HR 1904 seeks to restrict a core principle of our democracy - the right of Americans to seek redress in the court for grievances involving the federal government. The bill limits preliminary injunctive relief to 45 days, and forces any U.S. court to render a final decision on the merits of a case within 100 days. Finally, the bill seeks an astounding change in American legal standards by requiring courts to give deference to agency findings regarding the balance of harms in deciding whether to enter a temporary restraining order, preliminary injunction, or a permanent injunction in ANY court challenge where the agency claims the action is necessary to "restore fire-adapted forest or rangelands ecosystems."

4. Create New Insect Categorical Exclusion. HR 1904 creates a new Categorical Exclusion from the National Environmental Policy Act on all Department of Interior and Forest Service lands by authorizing an unlimited number of projects (up to 1,000 acres each) for all lands that the agencies claim are at risk of infestation by certain insects. This is simply a giveaway to the logging industry to clearcut large swaths of federal forests.

5. Provide New Logging Subsidies. HR 1904 would authorize \$125 million in subsidies to the biomass industry to log our National Forests. A large scale biomass industry is a certain boondoggle, since transporting wood chips out of the forest is costly and energy intensive.

The Healthy Forest Initiative ignores communities and pretends to help National Forests. But let's be honest, it is simply happy words for more commercial logging of our federal forests. Yes, parts of the National Forest system have been damaged by past management - roadbuilding, logging, fire suppression. But the cure isn't more of the same. The cure is to take the Forest Service out of the logging business, and let science and common sense guide the way to restoring our national treasures. At the same time, we know how to protect communities who are at risk from wildfire, and we had best get moving with this before we lose another Summerhaven.

Thank you very much for the opportunity to provide input to this critical issue.