



July 1st, 2020

The Honorable Jared Huffman
1527 Longworth House Office Building
Washington, DC 20515



Dear Representative Huffman,



As the ongoing COVID-19 pandemic tests our society’s resilience, the 2020 wildfire season is taking hold across much of the western US. In the face of this unprecedented challenge, protecting communities and natural resources from wildfire has never been more critical. As Congress debates further stimulus legislation, we recommend making bold investments in California’s forest restoration workforce to expand the use of prescribed fire to reduce the risk of extreme fire and improve forest resilience.

Background:

Forests across the western U.S. are experiencing an increase in the size and severity of wildfires. This trend is driven in large part by changes in forest structure due to a century of fire suppression. This trend has been especially pronounced in California, which experienced both its largest and most destructive wildfires in the past three years. There is broad agreement among fire scientists, land managers, and others, that the pace and scale of forest restoration needs to increase dramatically in order to make a meaningful difference in forest resilience across California. Prescribed fire and wildfires managed for resource benefits are essential restoration tools because they remove the surface and ladder fuels that have the largest influence over fire behavior¹, and are able to reach large portions of the forest landscape that are inaccessible to mechanical treatments.² Thinning treatments are most effective and long-lasting when combined with prescribed fire and maintained by fire over the long term.^{1, 3, 4}

The Needed Increase in Pace and Scale of Fire Restoration:

Scientists estimate that around 4.45 million acres would have burned annually in California prior to Euro-American settlement.⁵ Current rates of prescribed burning by both state and federal agencies fall far short of these ecological background levels, leaving a significant backlog of lands in need of beneficial fire each year.⁴ The California Air Resources Board estimates that approximately 125,000 acres are treated with prescribed fire in California each year.

Expanding the Prescribed Fire Workforce

Capacity to plan and implement prescribed burns – including a well-trained, available workforce – is the most significant barrier to fire restoration on federal lands.⁶ 224,900 acres of NEPA-ready prescribed fire projects existed across California’s 18 national forests in 2019 (see Appendix 1). However, restoring these acres is not guaranteed. Federal land managers often struggle to implement prescribed fire projects due to loss of staff to other regions during wildfire season, as well as loss of seasonal staff, trainings, and other demands on staff time outside of wildfire season. Capacity is an equally important barrier on private lands, where private burners such as nonprofit organizations, resource conservation districts, tribes, and fire safe councils, largely lack the funding and workforce necessary to plan and implement prescribed burns.⁷

Recommended Investments:

We recommend making the following investment of \$573,690,000 to complete 1,025,000 acres of prescribed fire in California in the next 5 years:

- Provide \$216,190,000 to the following USDA National Forest System Programs:
 - Provide \$90,000,000 to Hazardous Fuels to complete NEPA ready prescribed fire projects in the first year
 - Provide \$37,180,000 to Hazardous Fuels over five years to establish ten wildland fire modules, which are dedicated crews to implement prescribed and managed fire on national forest system lands as described in Appendix 2 and prescribe burn 300,000 acres
 - Provide \$14,650,000 to Hazardous Fuels over five years to establish ten prescribed fire site preparation crews to complete pre-fire site preparation work on national forest system lands as described in Appendix 2
 - Provide \$71,900,000 to Collaborative Forest Landscape Restoration in California to sustain existing collaboratives and add up to 3 new collaboratives
 - Provide \$2,500,000 to Land Management Planning, Inventory & Monitoring to complete active forest plan revisions, and to help forests pursue forest plan amendments allowing for managing naturally-ignited wildfires for resource benefits
- Provide \$227,500,000 to the following USDA State and Private Forestry programs over 5 years to complete 100,000 acres per year of prescribed fire on private lands and establish a prescribed fire jobs and training program
 - Provide \$7,500,000 to State Fire Assistance to support a coordinated prescribed fire training program for tribes, private burners, volunteer fire departments, and federal fire crews that encourages cross-jurisdictional projects. Potential recipient organizations or programs: 1) Prescribed Fire Training Exchanges (TRES); 2) University of California Cooperative Extension.
 - Provide \$200 million to Landscape Scale Restoration for an all-lands prescribed fire program through a block grant to the California Natural Resource Agency to be distributed to partner agencies such as resource conservation districts, prescribed fire associations, fire safe councils, and other organizations implementing and advising on the application of prescribed fire
 - Provide \$20 million to the Office of Tribal Relations to fund ten three-year Public Law 93-638 demonstration projects for tribes to implement prescribed fire projects on federal land bordering or adjacent to Indian trust land
- Provide \$80 million over five years to the Joint Fire Science Program within both USDA and DOI for applied fire research to enhance interagency collaboration and address barriers to prescribed fire implementation
- Provide \$50 million over five years to the DOI's Reserve Treaty Rights Lands Program for projects in California. Double the \$1 million cap for four year projects to enable tribes to participate in collaborative projects with feds, state, private landowners, and others to complete restoration projects on tribal priority landscapes within and adjacent to ancestral and reserved treaty right lands

To strengthen and expand the capacity to implement prescribed fire and reduce wildfire risk, we recommend adopting the following budgetary guidance:

- Ensure that the National Forest System funding for prescribed fire noted above is directed to the Hazardous Fuels account and dedicated to the use of prescribed and managed fire for resource benefits
- Prioritize investments in economically distressed and socially vulnerable communities including tribal reservations and disadvantaged communities

- Waive match and cost-share requirements so partners are able to complete work through cooperative agreements without additional financial burden
- Modify reimbursement requirements to allow for advance payment of grants to lessen the burden placed on cash-flow for small businesses
- Prioritize investments that use partnership agreements, master stewardship agreements and Good Neighbor Authority to accomplish needed pre-fire and prescribed fire treatments in order to sustain and expand local partnerships.

Additional policy and program recommendations to support and expand rural economies and their capacity for restoration are noted in Appendix 3. Together, these investments and policy changes represent a critical step towards protecting California’s communities and natural resources while building the state’s forest restoration workforce.

Thank you for considering these recommendations. Please contact Jamie Ervin (jamie@sierraforestlegacy.org; (828) 403-0418) if you have any questions.

Jamie Ervin
Sierra Forest Legacy

John Buckley
Central Sierra Environmental Resource Center

Craig Thomas
Fire Restoration Group

Melinda Booth
South Yuba River Citizens League

Pam Flick
Defenders of Wildlife

Andria Ventura
Clean Water Action

Matt Dietz
The Wilderness Society

Sherry Pease
Foothill Conservancy

Russell Attebery
Karuk Tribe

Jora Fogg
Friends of the Inyo

Nick Goulette
Watershed Research and Training Center

Laura Cunningham
Western Watersheds Project

Steve Frisch
Sierra Business Council

Patricia Puterbaugh
Lassen Forest Preservation Group

Ryan Henson
California Wilderness Coalition

Jerry Bloom
Forest Issues Group

Nick Jensen
California Native Plant Society

Don Rivenes
Sierra Foothills Audubon

Appendix 1: Area by National Forest in California with environmental decision to conduct prescribed burning (“NEPA ready projects”).

Zone	National Forest	Understory Burning (Acres)	Pile Burning (Acres)
Northern	Klamath	75,000	
	Lassen		
	Modoc	2,400	
	Shasta-Trinity	2,500	
	Mendocino	3,000	
	Six Rivers	2,700	900
Central	LTBMU		6,500
	Eldorado	32,000	
	Plumas	12,000	
	Tahoe	4,900	
Southern SN	Stanislaus	44,000	9,000
	Sierra	10,000	
	Sequoia	5,000	
	Inyo	7,500	
Southern CA	Cleveland	1,200	
	San Bernardino	6,000	
	Los Padres		
	Angeles	300	
		Total	208,500
	Grand total	224,900	

Appendix 2: Community Fire Protection and Forest Restoration Proposal

For too many years, California has experienced high intensity, catastrophic mega-wildfires that have destroyed entire communities. While a number of factors have created the conditions allowing such fires to burn (drought, climate/weather, land development patterns), fire managers and scientist all realize that removing fire from ecosystems that evolved with periodic, low intensity fire through decades of fire suppression have allowed highly unnatural fuel loads to develop

Prescribed fire or controlled burning is one of the most effective tools in reducing dangerous fuel loads to reduce the risk of high-intensity wildfires to communities and public lands. Increasing the pace and scale of prescribed burns in California can only be accomplished by increasing the number of organized crews required to plan, prepare for, and implement prescribed fires. Two types of teams are needed. “Wildland Fuel Teams or Modules” are specially trained and equipped teams that plan, implement, and manage prescribed burns. Second, before a well-managed prescribed burn can be implemented by a Wildland Fire Module, advance work to ready a site for burning must be undertaken by “Site Preparation Crews.” These hand crews prepare sites for prescribed burning by clearing containment lines, conducting needed fuel reduction along those lines, and undertaking other on the ground work need to make an area as safe as possible to allow the use of prescribed fire in as controlled a manner as is possible.



A meaningful investment to increase the amount, pace, and scale of prescribed burning in California would be to establish ten new Wildland Fire Modules and ten Site Preparation



Crews and retain them for at least five years, preferably longer. The opportunity already exists to implement burn projects that have already cleared all environmental compliance requirements on 224,900 acres of National Forest lands

The start-up costs of establishing ten Wildland Fire Modules is \$1,950,000.

Annual operating costs for those 10 teams for five years amount to \$35,229,100 for a total cost of \$37,179,100. The cost of ten Site Preparation Crews for the same duration is \$14,650,000, for a total investment of \$51,829,100 over five years.

Making this investment would also generate economic benefits to local, rural, and regional economies through the creation of jobs and associated economic activity.

Appendix 3: Additional Policy and Program Recommendations

Initiative #1: Support and Expand Rural Economies and the Capacity to Restore

- Fund community-based organizations, local fire services, and tribes to plan for and implement prescribed fire
- Provide relief through forgivable loans and grants to natural resource businesses impacted by COVID-19
- Fund restoration coordinator positions to organize and extend community-based restoration. Potential recipient organizations or programs: 1) Forest Health Watershed Coordinator Program, California Department of Conservation; 2) Sierra Corps Forestry Fellowship Program , Sierra Nevada Alliance; 3) Bear Corps, University of California, Berkeley.
- Fund resiliency retrofits and resiliency planning (e.g., wildfire, drought, flooding) through a block grant to a state agency, e.g., Office of Emergency Services, to be distributed to affected counties and then homeowners
- Increase number of Joint Chiefs Restoration Partnership project areas by twofold in California and fund immediate implementation
- Provide funding to increase the capacity of community-based nonprofits/intermediaries to implement forest restoration

Initiative #2: Increase Prescribed Fire Training Opportunities

- Fund an Interagency Prescribed Fire Training Center based in California
- Fund tribes to complete training and implementation for cultural burning
- Fund development of a prescribed fire emphasis in forestry training and job placement programs at community colleges such as Lake Tahoe Community College and Reedley College.

Initiative #3: Implement Treatments

- Fund conservation corps, community-based workforce development organizations, forestry corps, NGOs and tribes to complete treatments in advance of prescribed fire, e.g., fire lines, ladder fuel reduction, piling fuels, etc.
- Fund forestry corps, NGOs and tribes to participate in cooperative implementation of prescribed burning.
- Increase funding to Natural Resource Conservation Service for prescribed burn assistance on private lands through programs including EQIP
- Increase funding to the USFWS for prescribed burning in the National Wildlife Refuge System, and allow Partners in Fish and Wildlife Program to fund prescribed burning on private lands.

Appendix 4: References

1. Stephens, S.L., McIver, J.D., Boerner, R.E., Fettig, C.J., Fontaine, J.B., Hartsough, B.R., Kennedy, P.L. and Schwilk, D.W., 2012. The effects of forest fuel-reduction treatments in the United States. *BioScience*, 62(6), pp.549-560.
2. North, M., Brough, A., Long, J., Collins, B., Bowden, P., Yasuda, D., Miller, J. and Sugihara, N., 2015. Constraints on mechanized treatment significantly limit mechanical fuels reduction extent in the Sierra Nevada. *Journal of Forestry*, 113(1), pp.40-48.
3. Stephens, S.L., Moghaddas, J.J., Edminster, C., Fiedler, C.E., Haase, S., Harrington, M., Keeley, J.E., Knapp, E.E., McIver, J.D., Metlen, K., Skinner, C.N., and Youngblood, A., 2009. Fire treatment effects on vegetation structure, fuels, and potential fire severity in western U.S. forests. *Ecological Applications* 19, pp. 305-320.
4. North, M., Collins, B.M. and Stephens, S., 2012. Using fire to increase the scale, benefits, and future maintenance of fuels treatments. *Journal of Forestry*, 110(7), pp. 392-401.
5. Stephens, S.L., Martin, R.E. and Clinton, N.E., 2007. Prehistoric fire area and emissions from California's forests, woodlands, shrublands, and grasslands. *Forest Ecology and Management*, 251(3), pp.205-216.
6. Schultz C., Huber-Stearns, H., McCaffrey, S., Quirke, D., Ricco, G., and Moseley C. 2018. Prescribed Fire Policy Barriers and Opportunities: A Diversity of Challenges and Strategies Across the West. Ecosystem WorkForce Program Working Paper #86. Public Lands Policy Group Practitioner Paper #2.
7. Davis, E.J., Jolley, A., and Goulette, N. 2020. Investment opportunities for increasing forest and fire management in California: A capacity and needs assessment of local groups, non-profits, and tribes. Report by The Watershed Research and Training Center.