



Loren Torgerson
Wildfire Policy Advisor
Office of Commissioner of Public Lands

October 5, 2018

Mr. Torgenson;

I'm writing on behalf of Conservation Northwest and our members and supporters to provide comments on Washington's Wildland Fire Strategic Plan. Conservation Northwest had provided input through the interview and working group process's to this strategic plan. We fully support the mission statement as well as the need stated in line 74 of this plan that "Washington needs to simultaneously reduce the incidence and impacts of uncharacteristic fires, while increasing the prevalence of lower-intensity fires to achieve healthy landscapes and provide for safety of communities". Improved coordination and collaboration to reduce risks, and communities more involved in preparing for increases in wildfire in future years are all excellent points in lead statements of the plan. The Wildland Fire Strategic Plan can help fulfill our shared goals in the 20-year Forest Health Strategy and the state Climate Adaptation Strategy.

We especially support the use of prescribed fire combined with restoration treatments that both reduce risk of uncharacteristic fire and benefit ecosystem health of both forest and shrub steppe landscapes. We agree with the intent of the 10 strategies and especially support strategies 5 and 7. Our experience in shrub-steppe landscapes support legislation to create options for private landowners to become more involved in initial attack through the use of Rangeland Fire Protection Associations (RFPA's). Our experience in forest collaboratives in Washington especially support increasing investments in ecologically beneficial vegetation management as outlined in 7.3, although we recommend a high level of caution when considering grazing as a tool to maintain and create resilient landscapes, as grazing can spread weeds that perpetuate uncharacteristic fire behavior. Given the potential for unintended outcomes, we recommend removing grazing from 7.4 and keeping the focus entirely on removing barriers to managed and prescribed fire.

The high priority strategic actions (A-G) all make good sense. We are encouraged that this plan recognizes the effects of climate change on fire intensity, severity, and occurrence, leading to exorbitant costs in fire response and recovery. As well, the plan recognizes that overloaded fuel levels are susceptible to invasive species, and other threats that further accelerate fire risk and damage.

We acknowledge that a key barrier identified in the plan, "that thousands of acres are outside formal fire protection districts along with lack of coordination in response" has caused severe wildfire in shrub steppe habitat causing millions of dollars of damage to critical wildlife habitat and species such as the endangered pygmy rabbit population devastated by the Sutherland fire.

We have been happy to be a part of collaborative efforts to help people prepare for and avoid wildland fires that acknowledge communities as knowledge holders and hope to continue to do so as outlined in this plan. We would like to see added to this report a key legislative action to change current DOE smoke regulations (as administered to them by EPA) to allow higher level of smoke that result

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from prescribed burns. We would also be glad to serve on the Wildland Fire Agency Leadership Council or Advisory Group if asked. Environmental NGO's were not named on the WFAC.

The use of a Quality Analysis of Wildland Fire Risk (QWRA) and its distribution for use make good sense, as does increasing the capacity of the response work force. Training (3.5) to all current and new workforce should include sensitive habitat and species concerns in both forested and shrub steppe landscapes. Sensitive habitat and species locations should be located on fire response team maps to allow decisions for protection similar to structures or other important infrastructure.

Section 4.2 enhancing engagement with limited English proficiency communities is very important, especially establishing community leaders to engage with incident management teams.

In strategy 5 the identified action plans to establish effective wildland fire protection for all lands is especially important for shrub steppe communities. We fully support line 1239 and 5.1 "through legislation, establish RFPAs as an option for protection in areas with no current wildland fire protection. We also support 5.2 as alternatives as well as 5.3 to acquire a funding mechanism for enabling DNR to provide protection in the interim before RFPAs are established. We also support accelerating efforts to create and maintain resilient landscape as outline in 7.1 to 7.5.

We strongly support Strategy 6 and its focus on reducing human caused ignitions. In addition to education and outreach, we believe that controlling access by decommissioning or closing roads is an important factor in reducing human caused ignitions. Road decommissioning and closure or gating should be included as a tactic in Strategy 6.

Strategies as laid out in 8.1-8.4 to establish and sustain fire adapted communities are logical and well layed out. Any and all effort to develop cross-boundary "pre fire responsive" plans and agreements as described in Strategy 9 are extremely important, especially pre-positioning resources during periods of high fire danger (9.2).

CNW supports the need for planning, community and landowner input, and developing key strategies to overcome barriers that this plan lays out. We also recognize the need to put resources where they can protect human life and structures as a first priority, particularly because most other fires have the high potential to be beneficial to ecosystems. We also believe response before and after fires should recognize the importance of sensitive or critical wildlife habitat that needs to be considered throughout the process of preventing, fighting, and recovering from wildland fires.

Sincerely,

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