



POSITION STATEMENT

Wildland Fire and Building Landscape Resiliency

EXECUTIVE SUMMARY

The nation's wildlands are facing a significant crisis due to compounding conditions that adversely affect forest and rangeland health, leaving them susceptible to catastrophic wildland fires. These fires not only damage the land, infrastructure (e.g., housing, buildings, transportation corridors, etc.) and resources, but also create public health risks from smoke and water pollutants. Current fires cost billions of dollars to suppress and cause hundreds of billions of dollars in damage. Increasingly, damage is not covered by insurance as premiums for individuals and corporate entities have become too costly or coverage is not available. The impact of smoke is far beyond the immediate fire, leading to additional health care costs. The recent catastrophic fires in Los Angeles underscore the significant risk wildland fire brings to life and property to urban areas as well as urban interface landscapes.

An unprecedented collaborative approach is required to combat this urgent crisis, which must involve all land managers. Two important initiatives outline long-term solutions that have been welcomed by Federal, State and Tribal landowners: the National Cohesive Wildland Fire Management Strategy of 2014 and the Wildland Fire Mitigation and Management Commission, established by Congress in 2021. Both embrace a broad landscape scale approach and offer road maps for addressing the considerable challenges posed by fire management. The Public Lands Foundation (PLF) endorses the Bureau of Land Management (BLM) participation in both of these initiatives as well as increased support by the U.S. Congress and state governments of these initiatives to reduce the risk of catastrophic wildfires. Congress and the states may also need to find legislative solutions like insurance reform to support the rebuilding of communities.

BACKGROUND

High intensity wildfires release much of the stored carbon back into the atmosphere and there has been a dramatic increase in these fires over the past 30 years. These megafires are generating far more carbon dioxide than many other sources. For example, by September 2020, wildland fires in California alone had generated 91 million metric tons of carbon dioxide, 25 percent more than California's annual emissions from fossil fuels.

For over three decades, the BLM, the U.S. Forest Service (USFS) and other land management agencies have taken initiatives to address declines in forest health and resiliency. Congress also has worked to address this issue. This includes initiatives such as an expedited environmental review process that was included in the Healthy Forest Restoration Act (HFRA) of 2003. This would be enabled by the addition of two new Categorical Exclusions (CE) and streamlined Threatened and Endangered (T&E) species consultation. In addition, amendments to HFRA passed in the 2018 Farm Bill provided another CE for vegetation management in the sagebrush steppe to enhance habitat for sage grouse and mule deer. In 2021, Congress established the Wildland Fire Mitigation and Management Commission (WFMMC) to develop recommendations for the prevention, mitigation, suppression, and rehabilitation policies. The Commission issued their report in September 2023 with 148 consensus recommendations that are found at <https://www.usfa.fema.gov/about/media-releases/wildland-fire-mitigation-and-management-commission-report/>

While some work to address this problem has been successful, it has not been conducted on a sufficiently large scale to make a significant difference. A number of issues have complicated these efforts, such as inconsistent funding as well as the challenges of planning and implementation across landscapes with many owners. As a result of inconsistent funding, the BLM has lost critical expertise across all disciplines, including forestry, range management specialists, ecology and experts in managing vegetative projects needed to facilitate establishing healthy landscapes vegetation. Exacerbating this problem of lost capacity to address this issue is the increased workload caused by a court decision in 2015. The Ninth Circuit held in *Cottonwood Environmental Law Center v. U.S. Forest Service* (Cottonwood decision) that the USFS must reinitiate consultation under the Endangered Species Act on forest plans when a triggering event occurs (such as vegetative projects needed to reduce fuels to facilitate establishing healthy, fire-resistant landscapes)—in that case, the designation of critical habitat in the area affected by the action. This decision extends to BLM resource management plans as well, and places additional workload and timeframes on both the land management agencies and the U.S. Fish and Wildlife Service. The Congress has attempted to address this problem with proposed legislation in 2018 and 2023, and while the legislation had bipartisan support it did not pass.

Warming temperatures and prolonged drought have made vegetation more vulnerable to insects, leading to the die off of trees and effectively creating a tinderbox over thousands of acres. All dead standing trees pose a major fire threat and the number of dead standing trees continues to rise dramatically with warming temperatures and prolonged drought. Additionally, decades of aggressive fire suppression have changed the vegetative composition and density of forests so they are now more combustible, leading to more intense and higher temperature fires. The expanding wildland urban interface has further complicated efforts to manage fire. Additionally, neither the USFS nor the BLM have been able to conduct active forest management on much of their forested lands due to the loss of timber industry infrastructure as a result of the reduction in timber sales.

In short, fire is creating a national environmental, social, economic and health crisis. Impacts include:

- Adverse local economic impacts resulting from loss of timber to fire, insects and disease

- Reduced recreational opportunities
- Loss of habitat for critical and endangered species, including the Greater Sagegrouse
- Loss of forage for ranchers and wild horses and burros
- Increased soil erosion
- Adverse impacts on water and air quality
- Increasing losses of homes and buildings
- Drastic increases in carbon dioxide and other greenhouse gas releases, exceeding emissions from fossil fuels in some years
- Health impacts from smoke - locally, nationally, and internationally
- Emotional and psychological trauma to firefighters, people that work on the lands, and citizens that have lost their homes, family and friends, and communities
- Dislocation in transport from highway closures and road closures from active fires and post fire debris and landslides. (e.g., I-70, Glenwood Canyon, Colorado).

PLF POSITION

The PLF strongly recommends actively managing forests, along with aggressive post fire treatments and preventative landscape treatments. The PLF supports and advocates for the following:

1. Implementation of recommendations of the WFMMC for the prevention, mitigation, suppression, and rehabilitation policies.
2. Support an immediate increase in the pace and scale of landscape treatments to promote forest and rangeland health so they are resilient to wildfire, insects and disease. To accomplish this increase in pace, support the use of proven tools, such as the thinning of forests, improved species composition, use of mechanical vegetative treatments and prescribed fire, as well as targeted grazing and commercial timber harvests.
3. Support an analysis of workforce capacity to ensure that the BLM is adequately staffed to take on the increased workload needed to address these issues, including both the numbers of staff and appropriate skill mix.
4. Support an analysis of existing administrative tools addressing wildfire, forest and rangeland health to determine their effectiveness and use. This includes support for use of the tools that were provided in the HFRA of 2003, as amended in 2018. The BLM could then make policy and regulatory changes as appropriate and submit recommendations to Congress for legislative action as needed.
5. Support interagency efforts to actively manage forests for health and productivity to combat climate change.
6. Support rapid post-fire rehabilitation and long-term recovery through the prompt harvest of forest products and reforestation of burned over lands with appropriate species and density. Facilities that produce forest products (sawmills, biomass and slash/bark treatment facilities, etc.) should be located strategically in relation to recent large burns to

ensure success. Rangelands should be seeded with appropriate species mixes. While the land is recovering, steps must be taken to limit further damage from erosion, invasive species, and the negative impacts of fire suppression, which would likely be long-term projects lasting several years. These efforts would include deferral of livestock grazing for a period of at least two years to ensure successful restoration.

7. Support the use of alternative funding sources such as Forest Resiliency Bonds currently being used in California and by the U.S. Forest Service, to fund forest resiliency projects using the financial markets and private capital.
8. Principals and land managers should use every opportunity to discuss the new realities of fire frequency and intensity, including the need for collaborative wildfire planning in community development and the urgency for proactive protection of infrastructure and roads/highways.
9. Support legislative action that corrects the Cottonwood court decision requirement for ESA consultation with FWS for each and every vegetative project needed to facilitate establishing healthy landscapes.

February 2025