



County of El Dorado Clerk of the Board <edc.cob@edcgov.us>

## Comment letter on April 19th Consent Calendar item --BOS letter addressing wildfire management

1 message

**Craig Thomas** <craigthomas068@gmail.com>  
To: edc.cob@edcgov.us, BOS Four <bosfour@edcgov.us>

Mon, Apr 18, 2022 at 9:38 AM

We are writing again restating our opposition to Supervisor Turnboo's letter requesting adoption of (his) letter of support for HR 6903 (McClintock-LaMalfa) Bill to restrict

Forest Service discretion to manage wildfires according to their professional, tactical incident decision making process.

We support the new BOS letter addressing this issue for the April 19th 2022 consent calendar

The Fire Restoration Group second comment letter is attached and the recent Forest Service "Chief's Letter" addressing wildfire issues in 2022 is also attached and referenced in my comment letter.

Sincerely,

Craig Thomas



Craig Thomas, Director  
The Fire Restoration Group  
www.firerestorationgroup.org  
916-708-9409 (cell)

Our Product is Resilience---focus on what we re-establish, not what we take away.

### 2 attachments

 **Letter to EDCO Board of Supervisors 4-19-22 Restated Oppositions to Turnboo LOS for HR 6903 on consent calendar.docx**  
211K

 **Chief's Letter of Intent for Wildfire - 2022.pdf**  
368K

April 19, 2022

Lori Parlin, Chair  
El Dorado County Board of Supervisors  
330 Fair Lane  
Placerville, CA 95667



Dear Chair Parlin,

RE: Item 17 (page 9) on the Consent  
Calendar

We are writing again and restating our opposition to Supervisor Turnboo's letter requesting adoption of (his) letter of support for HR 6903 (McClintock-LaMalfa) Bill to restrict Forest Service discretion to manage wildfires according to their professional, tactical incident decision making process.

1) I hope the Board understands that the #1 consideration during any wildfire event (Forest Service or CAL FIRE) is firefighter safety. When fires occur in steep canyons such as the MF Cosumnes River Canyon it is extremely dangerous to send firefighting resources (human beings) into those conditions approaching a heading fire on steep ground. The Bill HR 6903 would increase the pressure to take risks for immediate suppression when it is not safe and could easily turn fatal. HR 6903 is an extremely wrong-headed idea by our Congressman McClintock who himself has very little knowledge of professional firefighting tactics or policy or the risks involved and who considers firefighters "unskilled labor".

2) The SoFAR Cohesive Strategy Collaborative has been engaged in meaningful restoration work with the Forest Service, CAL FIRE, BLM, the Resource Conservation District, Georgetown Fire Safe Council, (and others), the EDCO Fire Safe Council and local landowners within the 400,000-acre planning landscape since 2014. The National Cohesive Wildland Fire Management Strategy (2014) is the fundamental framework guiding our work together (see link below)

<https://www.forestsandrangelands.gov/documents/strategy/strategy/CSPhaseIIINationalStrategyApr2014.pdf> There is a clear and highly articulate Vision and Goals section of the Cohesive Strategy that is supported by all collaborative members who signed the Charter. A key section of the Cohesive Strategy is focused on **wildfire management for resource objectives**.

Supervisor Parlin and former Supervisor Veerkamp have been very supportive of our coalition's efforts to build community and forest resilience in El Dorado Co. Unfortunately, HR 6903 has thrown a wrench in the works of our collaborative efforts by attacking one of the key principles in the organizing document that guides our work. We need all the tools including wildfire management for resource objectives, and we should not be meddling with the Forest Service's professional discretion during wildfire events.

3) The Board should note that in the recent **Chief's Letter of Intent for Wildfire Season 2022** (attached) Chief Moore has directed that during Planning Level 4-5 (higher firefighting workforce drawdown) all decisions to manage wildfires for resource objectives will be reviewed by the Regional Foresters. That act should be seen as additional wildfire mitigation if we are in another bad wildfire year.

The Board has created an acceptable, reasoned response to the concerns raised by several constituents at, and after, the April 5<sup>th</sup> hearing, as reviewed in the April 19<sup>th</sup> Agenda packet in the consent calendar.

Sincerely,

Craig Thomas, Director, The Fire Restoration Group, P.O. Box 244, Garden Valley, CA 95633  
[craigthomas068@gmail.com](mailto:craigthomas068@gmail.com)

**File Code:** 5100**Date:** April 14, 2022**Route To:****Subject:** Chief's Letter of Intent for Wildfire - 2022**To:** Regional Foresters, Station Directors, IITF Director, Deputy Chiefs, and WO Directors

The 2021 fire year was challenging on many fronts. With 99 days spent at National Preparedness Levels 4 and 5, severe drought increasing intense fire activity across the West, thousands of communities at risk, firefighter fatigue, and COVID-19 degrading our response capabilities, we successfully confronted an historic national crisis. Together, we persevered through these challenges. I am proud of the professionalism and determination we continually demonstrated while living our agency core values of safety, diversity, service, conservation, and interdependence. This interdependence, coupled with common goals of protecting our communities and natural resources, will provide us the framework for this fire year.

If we are to change the current trajectory of the wildfire crisis in this country, we must use all the tools available to us to increase hazardous fuels reduction work by two to four times current levels across larger landscapes (<https://www.fs.usda.gov/sites/default/files/Confronting-Wildfire-Crisis.pdf>). That is our focus and priority, using the significantly increased funds we received from the Bipartisan Infrastructure Law (BIL), along with our regular appropriations. We must recognize, though, that this work will take a sustained effort over the long-term to make a true difference in fire behavior and community resilience. In 2022, with nearly 90 percent of the West remaining in drought, the level of hazardous fuels across the landscape, and the expanding wildland urban interface, we face an extremely challenging fire year and our wildland fire system will continue to be tested. Therefore, it is critical that we are anchored to risk management principles as we make decisions regarding prioritization as well as tactics and strategies employed in fire suppression.

Our foremost priority is to protect the health, safety, and well-being of the fire management community and the public we serve. As such, we will align our COVID-19 mitigation strategies with the Centers for Disease Control and Prevention (<https://www.cdc.gov/coronavirus/2019-ncov/science/community-levels.html>) with respect to masks and testing of our firefighters. We will also continue with small, dispersed fire camps and remote incident management. Finite resources require making choices, including to commit firefighters only to operations where they have a high probability of success and can operate effectively with no exposure to unnecessary risk to meet reasonable objectives.

Ensuring the well-being and resiliency of our brave firefighters and workforce is of paramount importance. Extensive time away from families and complex, high stress working environments tax their physical and psychological resilience. To help address these very real problems, changes have been made to Chapter 7 of the *2022 Interagency Standards for Fire and Fire Aviation Operations (Red Book)* that update work rest guidelines to require three days of rest for every 14 days worked, excluding travel days, upon return to their home unit. I also encourage you to review and use the support available through the



Forest Service Employee Assistance Program. The *NWCG Preparedness Guide for Firefighters and their Families* (<https://www.nwcg.gov/sites/default/files/publications/pms600.pdf>) and the companion *Reset Guide* ([https://www.fs.usda.gov/sites/default/files/fs\\_media/fs\\_document/Reset%20Guide\\_web.pdf](https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/Reset%20Guide_web.pdf)) are important resources to support the health and well-being of the wildland fire community. Work is also ongoing with the Department of the Interior and the Office of Personnel Management to develop a wildland firefighter series and improve pay parity to better recognize the value of the work done by our wildland firefighters. We will continue to provide information on these efforts as they move forward and will engage with our wildland firefighters to ensure their voices are part of this work.

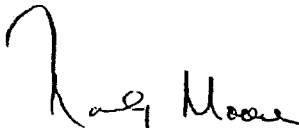
As we work to address immediate threats of uncharacteristic wildfire, it is important we continue to take proactive steps to reduce future risks of damaging wildfires when and where opportunities present themselves to employ fire in the right place, at the right time, and for the right reasons. In addition to mechanical treatments, extensive science supports using fire on the landscape and recognizes it as an important tool to reduce risk and create resilient landscapes at the necessary scale. I recognize that can be controversial and cause concern. Therefore, we must have a clear understanding of when, where, how and under what conditions we use this tool. We do not have a “let it burn” policy. The Forest Service’s policy is that every fire receives a strategic, risk-based response, commensurate with the threats and opportunities, and uses the full spectrum of management actions, that consider fire and fuel conditions, weather, values at risk, and resources available and that is in alignment with the applicable *Land and Resource Management Plan*. Line officers approve decisions on strategies and Incident Commanders implement those through tactics in line with the conditions they are dealing with on each incident. We know the dynamic wildland fire environment requires the use of multiple suppression strategies on any incident; however, this year we will more clearly articulate how and when we specifically use fire for resource benefit. The *Red Book* will be updated to require that during National and/or Regional Preparedness Levels 4 and 5, when difficult trade-off decisions must be made in how to deploy scarce resources most effectively, Regional Forester approval will be required to use this fire management strategy. This is commensurate with *Red Book* prescribed fire direction during these periods.

I am committed to an ongoing dialogue with our partners to ensure safe and effective risk management principles are followed to protect communities, keep our firefighters safe, and produce results that mitigate current and future risks from wildfire. Working closely with our partners to engage in robust dialogue before and during incidents and effective pre-planning has been shown time and again to be a best practice that yields better outcomes when wildfires happen. It is my expectation that all line officers and Fire leadership will fully utilize pre-season engagement planning with their state, county, and local governments, community leaders, and partners, leveraging the best science available, including the Potential Operational Delineation (PODS) program led by Research and Development. When PODS are in place, agency administrators should ensure that incident management teams use them to inform suppression strategies; when they are not, every effort should be made to develop them real-time as part of strategic operations.

I am resolute in continuing to strengthen the quality of our work environment in line with our core values of safety and diversity. Many in the fire community have been steadfast in ending harassment and discrimination and we must continue our work to ensure the wildland fire work environment is physically, psychologically, and socially safe. We all must live up to our Agency Code and

Commitments to treat everyone with respect, empower one another, invest in relationships, model integrity, protect one another, and learn from mistakes. We will continue to provide training, conversation guides, Safety<sup>3</sup> toolkits, and other resources to ensure we continue to shine a spotlight on rooting out all forms of harassment. In addition, we continue our commitment to being a learning organization through a pilot *Deep Dive* program led by our Work Environment and Performance Office. This year in fire camps you will see QR codes you can easily access on mobile phone to participate in a ThoughtExchange that will inquire into the lived experiences of wildland firefighters as it relates to harassment and discrimination in everyday work experiences. We need to hear from firefighters directly to learn and then correct harmful cultural norms. Together, we can create an environment where all are treated with dignity and respect. We will not tolerate sexual harassment or other forms of harassment and discrimination in any form. To that end, I expect Agency administrators to issue letters of delegation that place increased focus on prevention of all forms of harassment and discrimination in the incident work environment.

Let us continue to honor our fallen by remaining committed to one another's health, safety, and well-being, allowing adequate time for rest and recovery, and ensuring we do all we can to get everyone home safe, every day.

A handwritten signature in black ink that reads "Randy Moore". The signature is written in a cursive style with a large initial "R".

RANDY MOORE  
Chief