

**REMARKS OF GREGORY H. APLET, Ph.D., FOREST ECOLOGIST, THE  
WILDERNESS SOCIETY, BEFORE THE WILDLAND FIRE LEADERSHIP COUNCIL,  
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Chairman Bosworth, thank you for the opportunity to address the Council. I have been asked to provide the perspective of environmentalists, a group with which eighty-five percent of Americans identify themselves, on progress toward implementing the 10-year Comprehensive Strategy. It is indeed an honor to have been asked to present this perspective.

Today, in the brief time allowed, I intend to make three points. First, the emphasis so far displayed in Washington, DC, on changing laws and regulations directly contradicts both the spirit and the letter of the 10-year Comprehensive Strategy. Second, the three-tiered collaborative framework that is at the heart of the Comprehensive Strategy has been slow to develop and has been ignored in the various proposals coming out of Washington, DC. And third, the focus on federal land that has characterized Administration and congressional action is misplaced and cannot achieve the goals of the 10-year Comprehensive Strategy.

As a member of the team that helped craft the 10-year Comprehensive Strategy, I have been very disappointed with the Administration's actions taken in its name. As a group, we discussed potential changes in the law, and we determined that we did not need them. Rather, we needed to find ways to make existing processes work better, such as ensuring the availability of funding for endangered species consultation and NEPA work. In fact, the Implementation Plan repeated language in the Strategy underscoring that position. The language, found on page 8 of the Implementation Plan, reads, "This strategy should enhance collaboration among all levels and all parties for planning, decision-making, implementation, monitoring, and learning -- *without altering the responsibilities or statutory authorities of participating Federal and State agencies*" (emphasis added). That statement, affirming the lasting application of existing laws, was critical to enlisting the support of members of the conservation community for the Strategy.

Nevertheless, in its first major action ostensibly in support of the 10-year Comprehensive Strategy, the Administration advocated changing the law. The "Healthy Forests Initiative" proposed changing regulations to "improve" regulatory processes and changing laws to eliminate administrative appeals and lawsuits, authorize long-term contracts, and increase the logging of old growth. Specific legislative proposals have followed suit. This emphasis on changing environmental laws now threatens to wash away the common ground that has been built on this issue over the past two years. I urge you, as leaders of the federal agencies, to take this message back to Washington. Tell folks to focus on the common ground that was built through the 10-year Comprehensive Strategy and stop trying to change the law. There is plenty of work to be done in Washington to facilitate the Strategy without undermining the common ground that is necessary for future progress.

One of the places where there is the greatest need for attention is in facilitating the three-tiered collaborative framework. In crafting the Strategy, we recognized that community fire protection is a local issue that requires action at the community level. We also recognized that such action requires financial support. We set up the three-tiered structure in order to facilitate the flow of federal money down to the community level, where it could be put to use

implementing community-based plans. Money is needed both for the development of those plans and for their implementation. Currently, however, most money allocated for fire protection gets spent either on suppression actions and equipment, or on activities on federal lands, according to federal plans. The three-tiered structure was designed specifically to change that situation by facilitating the direct flow of money to the community level. So far, I have seen no action from Washington aimed at establishing and funding the collaborative framework.

I urge you to return to Washington as champions of the collaborative framework. Find ways to make it work. We intentionally left its ultimate structure undefined in the Comprehensive Strategy because we saw a number of successful models that could be applied. It should be the highest priority of the Council to establish and fund the collaborative structure to support community-based fire protection and restoration projects.

Finally, whatever actions are taken must recognize that community fire protection is primarily a non-federal issue. In its assessment of the fire risk to structures nationwide, Forest Service scientists found that 92 percent of the land at risk was non-federal. Here, along Colorado's Front Range, an area of abundant federal land, 80 percent of the so-called "Red Zone" is non-federal. Efforts to address the fire and fuel situation cannot be successful if they are focused on federal land. They must provide assistance to local authorities and communities to address the situation where it is most acute -- on private land. The 10-year Comprehensive Strategy explicitly recognized this situation, which is why we set up the three-tiered structure to give communities the flexibility to develop and implement their own fire safety plans. Despite this formula, the Healthy Forests Initiative and various congressional proposals have focused only on federal lands -- a strategy that will fail to address the problem.

This is not to say that there is no role for federal land managers in addressing the problem. Where federal lands abut communities or protect municipal water supplies, federal land managers have a duty to sit at the table and help formulate collaborative solutions. They also have a duty to implement those solutions through normal processes. But federal land managers cannot be expected to achieve the goals of the 10-year Comprehensive Strategy by themselves. The majority of the federal effort -- and the efforts of the Wildland Fire Leadership Council -- must support actions on private lands.

I appreciate the opportunity to present these ideas to you, and I wish you well in your deliberations.

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