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November 29, 2017

The Honorable Tony Tooke
Chief
U.S. Forest Service
1400 Independence Ave., SW
Washington, DC 20250

The Honorable Brian Steed
Acting Director
U.S. Bureau of Land Management
1849 C Street NW
Washington, DC 20240

Chief Tooke and Acting Director Steed,

I have been recently contacted by my constituent, Britt Ivy Boice, with some thoughts regarding wild horses, wildfire and forest management.

A copy of her letter, and detailed summary of a plan utilizing wild horses to reduce fuel loads on Forest Service and BLM lands, are enclosed. Hopefully it is of use as you work to manage our federal lands and wild horse and burro populations. I appreciate your attention to this matter.

Best regards,

Greg Walden

Greg Walden

CC: Britt Ivy Boice

TO: Congressman Greg Walden - 2nd District Oregon
RE: Natural Wildfire Abatement And Forest Protection Plan - 9/22/17

Dear Congressman Walden:

Please find the enclosed executive summary that outlines a compelling environmentally-friendly and cost-effective natural forest protection plan, that will at it's onset save taxpayers $70-million annually from the BLM's budget, and at the same time mitigate wildfire damage to our forests, wildlife and watersheds and will save on 'fire-borrowing'.

It has been estimated there are approximately 20-million horse lovers in America, and most of those people are active wild horse advocates and voters.

Whoever helps to save the 50,000 wild horses currently held in BLM corrals from slaughter or euthanasia will be a hero to those voters. Aside from the $-billions of dollars that would be saved annually from the direct, indirect and tertiary losses related to wild fires, this plan offers a trifecta of benefits and political capital across both aisles.

Having read a preliminary outline of this forest protection plan, several Deputy Directors at the Department of the Interior (including Tim Williams) scheduled a conference call with the plan's author, William E. Simpson II and spent thirty minutes discussing its merits. The plan is already endorsed by numerous leading scientists, senators, county commissioners, tens of thousands of citizens and radio talk show hosts Bill Meyer and Lars Larson.

We urge you to take a few minutes of your time to review the attached 4-page plan, which in just sixteen weeks since it debuted, has garnered a tremendous amount of attention and traction. Please advise if I can be of service in any manner of facilitation.

Sincerely,

Britt Ivy Boice 541-821-6022

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cc: Capt. William E. Simpson II - USMM Ret., Commissioner Court Boice

Natural Wildfire Abatement And Forest Protection Plan

'Wild Horse Fire Brigade'

A Proposal – 4 pages total

Wildfire: A Serious And Growing Problem Impacting America And Its Citizens

The nature and characteristics of wildfires in America have changed dramatically over the past decades as a result of management policies that allow forests to accumulate excessive amounts of ground fuels (grasses and brush) which act as the kindling needed to ignite other forest debris, such as dead and dying timber and previous fire-damaged trees. This problem is seriously compounded by the significant declines in the populations of large herbivores (deer, elk, moose and caribou, aka: *cervids*) that historically had controlled these grasses and brush via their ubiquitous grazing. By reducing these now prodigious super-hot burning ground fuels back to previous normal levels, the frequency and severity of wildfires would be much different.

1) Over the past 40-years, large herbivores such as deer, elk, moose and caribou in North America have seen significant drops in their populations from historic norms. For instance in California, the deer population has steeply declined from over 2-million deer to just about 350,000 deer in 2016 according to DeerFriendly.com (http://www.deerfriendly.com/deer/california/long-term-trends-in-california-s-deer-population). The populations of deer, elk and other herbivores have suffered significant declines in many areas as a result of several factors, including but not limited to disproportionately high predator populations and disease.

2) Under historic (normal) conditions in and around forests, deer and other large herbivores kept the ground fuels (grasses and brush) grazed-down (***natural grass & brush mowers),*** which significantly mitigated wildfire frequency and severity. Extensive incontrovertible research shows that whenever an herbivore population is depleted, catastrophic wildfires take over, to wit:

   According to *Science* Magazine: *"By altering the quantity and distribution of fuel supplies, large herbivores can shape the frequency, intensity, and spatial distribution of fires across a landscape. There are even unique interactions among large herbivore populations that can influence fire regimes. For example, facilitative interactions between white rhinoceros and mesoherbivores result in reduced fuel loads and fuel continuity, and consequently fewer large, intense fires (71). Other factors can influence the frequency and intensity of fires, particularly in locations where the total area burned is strongly related to ungulate population size.*

3) The massive and growing annual deforestation of America by highly-fueled super-hot wildfires, now known as ***megafires*** (defined as100,000 acres or more in size), presents as a grave threat to America's core natural resources and extends well beyond the loss of forests and trees. These megafires are also a threat to the national security of the United States of America, since they pose significant economic threats and also threaten critical infrastructure (roads, bridges, power transmission lines, communications, etc). Recently, the U.S. Coast Guard had to shut down vessel traffic on the Columbia River due to wildfire.

4) The health, lives and property of Americans are now under grave threat from wildfires. Thousands of homes and structures have been gutted and hundreds of lives taken by wildfire annually. A National Institute of Heath study 'Non-Accidental Health Impacts of Wildfire Smoke' said; "Wildfires take a heavy toll on human health worldwide" (https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4245643). Thousands of Americans across the country who are and have been subjected to long-term wildfire smoke inhalation are falling ill, some requiring urgent medical care. "People are getting sick. That's the whole long and

short of it," said Sarah Coefield, an air quality specialist at the Missoula City-County Health Department in western Montana. Wildfire smoke is especially dangerous to people with chronic heart and lung problems, said Julie Fox, an environmental epidemiologist with the Washington State Department of Health.

5) Populations of wildlife and habitat are being decimated by wildfires as millions of animals ranging from frogs to elk are vaporized in these wildfires annually. Watersheds and fisheries are also being devastated and ground water stores and surface waters are adversely affected as well.

6) According to the National Interagency Fire Center (https://www.nifc.gov/fireInfo/nfn.htm) American forests were being devastated at the average rate of 5.7-million acres per year, for the past ten years 2006-2016. In 2017 alone, we have already lost 8.5-million acres.

7) According to one 2009 fire-cost report by By Bob Zybach, Michael Dubrasich, Greg Brenner, John Marker (http://www.iawfonline.org/FIRE%20COSTS%20REPORT.pdf):

   "US Forest Service and other local, State, Federal, and Tribal government wildfire suppression costs have also escalated dramatically, to nearly $2 billion/year. Preliminary research indicates that USFS suppression costs may represent only 2-10% of the total "cost-plus-loss" damages to burned forests, however; recent public losses attributable to major forest wildfires may total $20 billion to $100 billion/year (or possibly more)."

8) According to a 2014 white paper titled; 'Twenty Years of Forest Service Land Management Litigation', by Amanda M.A. Miner, Robert W. Malmsheimer, and Denise M. Keele (http://forestpolicypub.com/wp-content/uploads/2014/03/Twenty-Years-of-Forest-Service-Land-Management-Litigation-JoF-Jan.-2014.pdf)

   "This study provides a comprehensive analysis of USDA Forest Service litigation from 1989 to 2008. Using a census and improved analyses, we document the final outcome of the 1,125 land management cases filed in federal court. The Forest Service won 53.8% of these cases, lost 23.3%, and settled 22.9%. It won 64.0% of the 669 cases decided by a judge based on cases' merits. The agency was more likely to lose and settle cases during the last 6 years; the number of cases initiated during this time varied greatly. The Pacific Northwest region along with the Ninth Circuit Court of Appeals had the most frequent occurrence of cases. Litigants generally challenged vegetative management (e.g., logging) projects, most often by alleging violations of the National Environmental Policy Act and the National Forest Management Act. The results document the continued influence of the legal system on national forest management and describe the complexity of this litigation."

9) There is abundant evidence to support the position that when any forest project posits vegetative management in forests as a pretense for a logging operation, salvage or otherwise, litigation is likely to ensure, and in addition to NEPA, the USFS uses the Property Clause to address any potential removal of 'forest products'. Nevertheless, the USFS currently spends more than 50% of its total budget on wildfire suppression alone; approximately $1.7-billion annually, while there is scant spending for wildfire prevention.

10) The implementation of vegetative abatement of exclusively grasses and brush by large herbivores (native species wild horses) would be consistent with managing the ecosystem in and around selected forests in a manner consistent with a *naturally operating ecosystem*, where re-introduced of native wild horses could pick-up the grazing slack for the absent or depleted deer and elk. In post-burned forest areas, this methodology may be extremely effective in limiting re-burns. We have observed serious re-burns in many locales: I.E. Kalmopsis Wilderness 'Biscuit Fire 2002' – same area re-burned due to excessive grasses and brush in '2017 Chetco Bar Fire'. Six Rivers National forest burned in 2014, re-burned 2017... excess ground fuels.

Natural Wildfire Abatement And Forest Protection Plan

'Wild Horse Fire Brigade'

A Proposal – 4 pages total

Family of wild horses that grazed-in a fire-break in a forest

<u>A Solution</u> providing acceptable compromises for all sides: 'Wild Horse Fire Brigade' ('WHFB')

This plan posits the redisposition of approximately 50,000 wild horses held in BLM and USFS corrals in and around selected wilderness forest areas via proportionate allocations based upon established carrying capacity of the land, specifically areas where no conflicting livestock grazing issues exist or are anticipated as well as areas not suited to livestock grazing for various reasons including but not limited to issues related to terrain and management access, *predators* and sensitive ecosystems not suited to livestock management .

This initiative addresses three exigent issues of significant importance to the DOI, USDA, BLM & USFS:

1. The current and future disposition of the free-roaming native American wild horses *that have been removed* from herd management areas (HMAs) and are currently being warehoused by BLM in corrals costing $70-million/yr. must be addressed. Any effort to dispose of these treasured wild horses via slaughter or euthanasia would result in a political firestorm and extensive litigation by horse and burro advocates. Deploying the horses for fire abatement is optimal from both a political and economic standpoint, since each horse will abate 30-lbs. of grass and brush daily and due to their unique gastric systems, most seeds they consume are redeposited into the soil intact via their droppings, which rebuilds damaged soils. Fifty thousand wild horses allocated in and around selected forests would abate approximately 1.2-million pounds of ground fuels daily, which using any other abatement methodology would cost tens of millions of dollars annually. Horses don't drip fuel or make sparks as they continue to abate even dry grasses and brush during the heat of summer.

2. The current and ongoing serious population declines in deer and elk (and other *cervids*) across America, which is attributable to both disease (chronic wasting disease: 'CWD') and excessive predation by disproportionately abnormally large populations of predators, *primarily* mountain lions and coyotes is naturally mitigated by this plan. The re-introduction of native species wild horses into carefully selected areas in and around forests addresses two aspects of the decline in cervids; a) Horses are immune to the deadly prion disease (Chronic Wasting Disease) that is vectored into deer and elk via grasses and brush; and, b) wild horses would absorb some of the predator pressure on deer and elk by apex predators (a natural event in a balanced ecosystem), thus allowing some relief for declining deer and elk populations in the United States. This aspect of the plan is a big plus for the $10-billion dollar/yr. U.S. hunting industry.

3. The redisposition of the corralled wild horses provides an exigent cost-effective pilot solution that embodies an all-natural alternative pre-fire management/prevention methodology that can used alone or integrated with other mechanized pre-fire management methods in some areas to save American forests and watersheds, and would; (i) alleviate the costs of holding the horses; and (ii) sidestep the potential political firestorm if these horses were to be killed; and (iii) help limit 'fire-borrowing' in the USFS budget. There is zero doubt that these horses would reduce fuel-loading in and around forests at risk once deployed. They evolved as a North American species alongside deer, elk and other cervids doing that job.

4. **Authority** for the Secretary's (DOI and/or USDA) implementation of any *emergency measure(s)*, which may include using WHFB to protect forests, may already reside under existing law including but not limited to; 16 U.S. Code § 551 - Protection of national forests; and/or 16 U.S. Code § 594 - Protection of timber owned by United States from fire; and/or 43 CFR 46.205 - Actions categorically excluded from further NEPA review. ***However this plan could be enacted via Executive Order.***

5. The Scharader-Simpson Wildfire Disaster Funding Act (a bill) currently cites allocating additional funding for mechanized pre-fire management to abate excess fuels in and around forests and for fire-attack. The WHFB initiative could add an **environmentally-friendly** and **cost-effective dimension** to that bill. Wild horses would abate fuel-loading in and around selected forests (including those recently burned which become at-risk for re-burn once grasses and brush reestablish (I.E. Six Rivers/Klamath Nat. Forests) and would perform this service year-round. Wild horses can safely abate excess fuels (grass-brush) *even in fragile or difficult-terrain forest ecosystems* not suited to any mechanized methods.

Mr. William E. Simpson II and his wife are well-known in advocacy circles as a result of their living among wild (feral) horses for the past 4-years in a forested ecosystem (Soda Mountain Wilderness Area). Mr. Simpson has a background in business, science and livestock, and has a working understanding of the behavior and habits of wild horses in the wilderness. See: https://www.horsetalk.co.nz/author/billsimpson