



WILDFIRE REPORT RECOMMENDATIONS

August 2024



INTRODUCTION

In 2023, a Wildfire Roundtable hosted by Governor Brad Little and Lt. Governor Scott Bedke met with industry leaders to discuss specific issues relating to wildfires in Idaho.

Those issues were:

- Liability Reform For Utilities and Insurers
- Wildfire Mitigation Strategies
- Statewide Communication

Recognizing a need to create actionable items, the Lt. Governor, with support from the Governor, announced the creation of four workgroups to examine these issues areas and provide reports to the Governor's Office. Those groups were:

Wildfire Workgroup #1: Federal Issues and Rangeland Fire Protection Associations (RFPAs)

- Mike Guerry, Guerry, Inc., Co-Chair
- Mike Edmondson, Idaho Office of Species Conservation (OSC), Co-Chair
- Shawn Keough, Associated Logging Contractors of Idaho, Co-Chair

Wildfire Workgroup #2: Insurance, Liability, and Utilities

- Max Beach, Idaho Consumer Owned Utilities Association (ICUA), Co-Chair
- Dean Cameron, Idaho Department of Commerce, Co-Chair

Wildfire Workgroup #3: Information Sharing

- Dustin Miller, Idaho Department of Lands (IDL), Co-Chair
- Chris Way, Kootenai Fire, Co-Chair
- Brad Richy, Idaho Office of Emergency Management (IOEM), Co-Chair

Wildfire Workgroup #4: Emergency Response

- Brad Richy, Idaho Office of Emergency Management (IOEM), Co-Chair
- Mark Niemeyer, Boise Fire, Co-Chair

The reports were reviewed by a team of state agency directors who selected the following actions and associated directives to be prioritized for 2024 and 2025. The workgroup reports can be viewed in their entirety as attachments to this report.

Recommendations submitted to the Governor but not listed in this report may be accomplished through other efforts and will be considered for future reports.



RECOMMENDATIONS AND DIRECTIVES

1.

Work with Congressional Delegation to encourage US Forest Service, Bureau of Land Management (BLM), and US Fish & Wildlife Service (FWS) to conduct programmatic Environmental Impact Statements (EISs) and Environmental Assessments (EAs) on existing transmission Rights of Way to remove permitting and liability issues associated with fuels treatments, vegetation management, and ignition prevention maintenance in those transmission corridors.

Direction: OSC will work with stakeholders to draft a letter to federal agencies and Congress requesting more categorical exclusions (CE) for vegetation management treatment.

2.

State-level legislation adopting clear wildfire liability standards for electric utilities based upon utilities implementing wildfire mitigation measures contained in their Wildfire Mitigation Plans.

Direction: The Idaho Department of Insurance (DOI) and the Idaho Public Utilities Commission will work with stakeholders such as insurers, utilities, and others to mitigate risk in relation to wildfires. IOEM and the Governor's Office of Energy and Mineral Resources (OEMR) will support efforts for any evaluations that are necessary in relation to Wildfire Mitigation Plans and will continue to review best practices and legislative proposals and laws, in other states.

Direction: Develop state-level legislation implementing clear wildfire liability standards for electric utilities based upon utilities implementing wildfire mitigation measures that may be contained in their Wildfire Mitigation Plans, including allowing electric utilities to manage vegetation and remove at-risk trees within the designated right-of-way or easement area where the utility does not have that right under existing permits or recorded easements. These efforts will be led by OEMR but include other stakeholders (including the Idaho Transportation Department (ITD), local highway districts, and emergency responders) and will identify priority corridors for mitigation.



RECOMMENDATIONS AND DIRECTIVES

3.

The State of Idaho should begin to work with stakeholders, specifically local community officials, to develop and adopt a Statewide notification and evacuation plan. The notification tool should be mobile and be capable to receive notifications in areas with cellular coverage and in areas without. Evacuation plan should be developed and housed at each county's emergency management office, and should address supporting individuals with access and functional needs. GIS solutions should be identified to quickly map evacuation areas and to identify values at risk within evacuation areas and to assist with communication of risk and recommended actions.

Direction: IOEM will work with relevant state and local agencies (including county sheriffs, city police departments, county emergency management offices, the Idaho Department of Health & Welfare, the Idaho Division of Veterans Services, and health districts) to implement this.

4.

Continued collaboration between electric utilities and federal, state, and local agencies to prevent wildfire and prepare for emergency response when wildfires do occur.

IDL work with National Alliance of Forest Owners (NAFO) to improve communication equipment, and ensure they provide personal protective equipment (PPE) for crew members, if they are willing to respond to wildfire starts within their operating areas.

Direction: IDL will work with NAFO to accomplish this goal.

The State of Idaho should create an Interoperability Committee with the intention of coordinating wildland fire detection cameras. Focused efforts to build an Idaho-based fire detection camera interoperability program.

Direction: IDL, IOEM, OEMR, and ITD will lead this effort to establish the interoperability system. This will include engaging with federal agencies like the Forest Service to utilize lookout stations that could be prime locations to install and monitor additional cameras.



RECOMMENDATIONS AND DIRECTIVES

5.

Expand the capability and access to a new interagency Idaho fire information webpage: create www.firewatch.idaho.gov / Idaho Fire Watch, and brand as a one-stop place for fire-related information in Idaho. Idaho Fire Watch could likely interact with fire detection cameras as well.

Direction: IDL, Idaho Department of Fish & Game (IDFG), and the Idaho Office of Information Technology Services (ITS) will collaborate to develop a one-stop shop website.

6.

The State of Idaho should consider Wildland-Urban Interface (WUI) Code Implementation and Adoption to identify gaps in building code, develop support with community and elected officials through outreach and education activities, and support amending or adopting of code with county and municipality officials.

Direction: IDL should work with IOEM to apply for a Federal Emergency Management Agency (FEMA) Building Resilient Infrastructure and Communities Grant. This WUI Code Implementation and Adoption grant project will also provide community educational engagement efforts for the purpose of establishing support for code development and adoption transparency, increasing public education for code implementation.

7.

Develop a library of potential grant sources through non state funding sources to:

Direction: OSC, IDL, and IOEM will support local fire departments/districts that fight wildland fire, Timber Protection Associations (TPAs), RFPAs, etc. to acquire fire suppression assets, communication equipment (digital radios & repeaters) and PPE that fight wildland fire. Have broader definition of eligible entities, beyond fire departments, to allow access by RFPAs, protective associations, etc. to funding.

Direction: OEMR, DOI, and IOEM will support counties, cities, utilities, homeowners, and other stakeholder in efforts to fund wildfire risk mitigation projects that reduce liability and hazards. IDL currently supports counties in these efforts through federal grant funded efforts but could expand these efforts with additional state funding.

RECOMMENDATIONS AND DIRECTIVES

8.

Develop a statewide MOU between firefighting entities at local, state, and federal level to ensure capacity, coordination, and mutual aid response during wildfire events.

Direction: IDL, IOEM, and DOI will work with fire chiefs, and other firefighting entities to draft and MOU on roles and responsibilities.

Direction: IDL and IOEM work with Idaho Fire Chiefs Association to engage their membership in enhanced Type 3 Incident Management Team (IMT) capabilities. Type 3 IMTs are an extended attack coordination module for managing wildfire events. IDL and IOEM should consider whether the Type 3 IMTs authorized under Title 46 Chapter 1027 (c) would provide the appropriate mechanism for creation of the teams and the ability to engage local government.

9.

Continued funding for OEMR to offer grants for wildfire resiliency, mitigation, and backup generation.

Direction: OEMR will identify state and federal opportunities to offer these grants for hardening the grid to ensure Idaho's energy assets are protected from threats such as wildfire events.

10.

The State of Idaho should improve state-wide access to aviation assets for enhanced initial wildfire response.

Direction: IDL, in response to recent changes in federal aviation management, will expand agency aviation program expertise. IDL will analyze if staffing is needed to improve programs/processes to manage contracted fixed and rotor-wing aircraft and expand the State of Idaho wildfire aviation program.



Memorandum

DATE: April 11, 2024
TO: Governor Little
FROM: Shawn Keough, Mike Guerry, Mike Edmondson
CC: Jamie Neill, Wildfire Workgroup #1
RE: Wildfire Workgroup #1 RFPAs/Federal Issues Report

RE: Wildfire Workgroup #1 Report (RFPAs/Federal Issues)

You appointed this group in November 2023, after your Wildfire Roundtable. You requested there be a thorough review of wildfire policies and best practices in the State of Idaho under four (4) main buckets: policy, funding, technology/collaboration, and agency actions. In addition to this list, Workgroup #1 added a fifth topic, denoted as mapping.

Workgroup #1 determined that our thoughts and suggestions should be focused on items that could be worked on over time as the Wildfire Roundtable discussions continue, and not necessarily items that would be accomplished by the recommended April 2024 report timeline.

The intended focus of these recommendations is on wildland firefighting/fire fighters and not to be inadvertently applied to fire departments that do not have a wildland fire responsibility. Further, a needs assessment should be completed for these recommendations to identify what resources are needed to implement them as actions. No prioritization of recommendations has been attempted in this report.

With the above in mind, please see our following thoughts and suggestions based upon those (5) five main buckets, as you have requested.

- **Policy:**
 - Work with Forest Service (FS), Bureau of Land Management (BLM) and Idaho Department of Lands (IDL) to expand training of Law Enforcement Officers (LEOs) to include Crew Boss training. Work with law enforcement staff to provide supervision to enable the utilization of convict fire suppression crews.
 - Work with private developers to make use of the Leasing consideration using In-kind Contributions (Section 8623 of the 2018 Farm Bill) to develop federal administrative sites across the State of Idaho. These sites could provide affordable housing for seasonal/permanent wildland firefighters especially in areas where affordable housing doesn't exist.
 - Work with Congressional Delegation to encourage FS, BLM, and U.S. Fish & Wildlife Service (FWS) to conduct programmatic Environmental Impact Statements (EISs) and Environmental Assessments (EAs) on existing transmission Rights of Way to remove permitting and liability issues associated with fuels treatments, vegetation management, and ignition prevention maintenance in those transmission corridors.

Memorandum

- **Funding:**

- Develop a library of potential grant sources for use by local fire departments/districts that fight wildland fire, Timber Protection Associations (TPAs), Rangeland Fire Protection Associations (RFPAs), etc. to acquire fire suppression assets, communication equipment (digital radios & repeaters) and personal protective equipment (PPE) that fight wildland fire. Have broader definition of eligible entities, beyond fire departments, to allow access by RFPAs, protective associations, etc. to funding.
- Improve communications with local fire districts/departments and suppression entities that fight wildland fire about the availability of fire suppression equipment and grants.
- Work with Congressional Delegation to amend the Infrastructure Investment & Jobs Act (IIJA) to not only provide slip-in fire suppression units, but to further provide funding for additional suppression assets, communication equipment and PPE.
- Identify/create a reliable funding source to purchase and maintain digital radios

- **Technology/Collaboration:**

- Work in partnership with utility companies, Idaho National Laboratory (INL) and universities to develop or test advanced technology that can be added to transmission corridors to detect line faults or abnormal conditions. Thus, allowing for utility operators to be informed of potential problems and/or providing advanced notification for rapid dispatch of fire suppression resources in initial attack. Advanced technology may help minimize unplanned outages or faults, and therefore, will decrease impacts on communities and natural resources (i.e. ability to pump water).
- Work with private entities to identify or develop satellite technologies for early detection of heat sources, and drone technologies for early ocular observation. Thus, improving response times of initial attack resources on fire starts.
- Expand and/or create dialogue between agencies (FS, BLM, IDL, etc.), fire suppression resources (local fire departments/districts that fight wildland fire, TPAs, RFPAs, etc.) and industry partners, so they can understand each other's challenges and opportunities.
- Expand, enhance, and/or formalize dialogue between the federal agencies, state and local entities, forest industry participants, and logging contactors on strategic fuel reduction targets on federal lands to ensure current fuel reduction programs are aligned and in concert with other treatment goals across all landscapes. Work with the National Forests in Region 1 and Region 4 to update or amend their Forest Plans to align with these goals.
- Wildfire Workgroup #1 supports the following recommendation which is likely to also appear in Workgroup #2 and #3 recommendations: The State of Idaho should

Memorandum

create an Interoperability Committee with the intention of coordinating wildland fire detection cameras.”

- **Agency Actions:**

Southern Idaho:

- IDL continue to work with existing RFPAs to look at expanding their current boundaries to include certain unprotected or solely Federal or State protected areas (i.e. northern Gooding County, eastern Lincoln County, northwestern Bingham County, etc.).
- IDL continue to work with individuals in certain unprotected or solely Federal or State protected areas to create additional stand-alone RFPAs, or RFPAs that function as Wildfire Divisions of existing local fire departments/districts that fight wildland fire (i.e. Camas Prairie, all of Caribou County, southern/eastern Power County, southwestern Cassia County, etc.).

Central & Northern Idaho:

- IDL work with existing TPAs to look at expanding their current boundaries to include certain unprotected or solely Federal or State protected areas.
- IDL work with individuals in certain unprotected or solely Federal or State protected areas to create additional stand-alone TPAs or Wildfire Divisions of existing RFDs.
- IDL work with National Alliance of Forest Owners (NAFO) to improve communication equipment, and ensure they provide PPEs for crew members, if they are willing to respond to wildfire starts within their operating areas. See Attachments 1 & 2 (NAFO Agreements).

All of Idaho:

- IDL work with existing ski resorts operating on private and FS lands to provide preparedness and training, to assist in initial attack efforts. These entities have staff on site during summer months and have high value infrastructure adjacent to high fire risk timber.
- Work with the Idaho Fire Chiefs Association, State Fire Marshal, and IDL to do a needs assessment for entities fighting wildland fire.

- **Mapping:**

- Continue to develop the map provided by Governor’s Office of Species Conservation (OSC) and IDL (Attachment 3) to locate and quantify unprotected or solely Federal or State protected areas throughout Idaho. Working especially with the affected utility companies to provide insight into potentially unprotected transmission corridors.

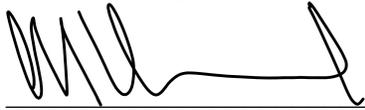
Memorandum

In closing, we would like to thank you for the opportunity to express our thoughts and suggestions denoted here and look forward to working with you on their potential implementation.

Respectfully submitted by:

Shawn Keough

Shawn Keough, Co-Chair



Mike Edmondson, Co-Chair

Michael A Guerry

Mike Guerry, Co-Chair



FS Agreement No. 24-MU-11132540-031

NAFO Agreement No. _____

**MEMORANDUM OF UNDERSTANDING
Between The
NATIONAL ALLIANCE OF FOREST OWNERS
And The
USDA, FOREST SERVICE**

This MEMORANDUM OF UNDERSTANDING (MOU) is hereby made and entered into by and between the National Alliance of Forest Owners, hereinafter referred to as “NAFO,” and the United States Department of Agriculture (USDA), Forest Service, Washington Office, State, Private and Tribal Forestry, hereinafter referred to as the “U.S. Forest Service.”

Background: Increasingly intensive fire seasons severely impact the environment, local and regional economies, and public health. They also cause significant resource damage on private working forests, which annually provide ninety percent of the timber harvest for mills and nearly three-quarters of the gross forest carbon sequestration in the United States. Wildfire risk most acutely impacts landscapes in western states.

Federal, State, and local forest owners and managers have a shared stewardship responsibility to protect natural resources and the communities that depend on them from wildfire risk. Worsening conditions are making risk mitigation more urgent. Congress has provided considerable federal resources to reduce fire risk, but on-the-ground treatments continue to be difficult, time-consuming, and expensive. The ideal delineations of fuel breaks often cross jurisdictional boundaries adding to the complexity and cost of planning and building them.

The U.S. Forest Service must expand partnerships and approaches to accomplish agency goals detailed in the Wildfire Crisis Strategy, including those that will enable building and maintaining strategic fuel breaks more cost-effectively across landscapes with multiple ownerships. By working collaboratively together, capitalizing on each other’s expertise, NAFO Member Companies and the U.S. Forest Service will achieve mutually beneficial outcomes such as protecting natural resources, communities, and infrastructure from wildfire.

The U.S Forest Service is fully committed to meeting the intent lined out in this MOU.

Title: Coordination of Cross-Boundary Fuel Break Design and Construction

PURPOSE: The purpose of this MOU is to provide the framework for the Forest Service Regions and Forests, and NAFO member companies (Member Companies) to plan,



construct, and maintain cross-boundary fuel breaks on adjacent National Forest System (NFS) and Member Company forestlands.

I. STATEMENT OF MUTUAL BENEFIT AND INTERESTS:

The National Alliance of Forest Owners (NAFO) is a national advocacy organization committed to advancing Federal policies that ensure private working forests provide clean air, clean water, wildlife habitat and jobs through sustainable practices and strong markets. NAFO presently has 46 member companies that own and manage more than 44 million acres of private working forests. NAFO's membership also presently includes 34 State and national associations representing tens of millions of additional acres of forestland.

The U.S. Forest Service is one of the Federal land management agencies under the Department of Agriculture that manages 193 million acres of land. The mission of the U.S. Forest Service is to sustain the health, diversity, and productivity of the nation's forests and grassland to meet the needs of the present and future generations.

NAFO and the U.S. Forest Service share a mutual interest in proactively addressing the wildfire crisis and are mutually committed to the following:

1. Sustainable forest management and the long-term health of natural resources including clean air, clean water, and wildlife habitat.
2. Prioritizing the safety and protection of communities, critical infrastructure, timberlands, air and water quality, wildlife habitat, and other valuable public and private assets.
3. The importance of forests to climate mitigation and the value of maintaining and increasing mitigation benefits over time.
4. The urgency of finding innovative and enduring solutions to proactively address the threats of drought, fire, and other natural disturbances that jeopardize the environment, communities, businesses, private property, and social well-being.
5. Efficient and cost-effective fuel break construction optimizing the use of available authorities, methods, and resources through close coordination, communication, prioritization, and execution.
6. The use of well-designed, constructed, and maintained fuel breaks as a backstop to initial attack and other direct attack efforts for the protection of valuable natural resources on both NFS and private forestlands.
7. A strong partnership to achieve these mutual objectives.

In consideration of the above premises, the parties agree as follows:



II. NAFO SHALL:

- A. Provide points of contact (Company Contacts) from participating Member Companies to coordinate with the U.S. Forest Service at the Regional and Forest level. See attached addendum.
- B. Through Member Companies, coordinate with the U.S. Forest Service at the Region or Forest level, to:
 - a. determine the location, timing, and desired outcome for fuel break construction and maintenance to meet both Member Company and U.S. Forest Service land management needs for wildfire risk reduction.
 - b. ensure that fuel break construction and maintenance on NFS land takes full advantage of natural and man-made features (e.g. active, closed, and decommissioned roads) to optimize fuel break effectiveness.
 - c. consult on road decommissioning on NFS land adjacent to Member Company land to consider fuel break values.
 - a. Discuss and evaluate the use of Member Company resources to construct and maintain fuel breaks on or affecting NFS land where the fuel break -
 - i. crosses NFS and adjacent Member Company land,
 - ii. is entirely on NFS land adjacent to Member Company land, or
 - iii. is entirely on Member Company land adjacent to NFS land and the predominant benefit accrues to the USFS.
- C. Cooperate in external communications regarding the mutual benefit of completed fuel break construction and maintenance as well as other fuel management activities in the larger planning area that help meet overall risk mitigation objectives.
- D. Coordinate with the U.S. Forest Service at the National, Regional, and Forest level in reporting the outcomes of fuel break construction and maintenance, including the effectiveness of fuels breaks in wildfire prevention or suppression, and determine how to appropriately monitor completed work for ongoing effectiveness.

III. THE U.S. FOREST SERVICE SHALL:

- A. Communicate with Regional, Forest and District level staff the importance of implementing the intent of this MOU, efficiently and expediently.
- B. Provide points of contact from the National, Regional and Forest levels to coordinate with the Member Companies. See attached addendum.



- C. Through Regional or Forest level contacts, coordinate with the Member Companies to:
 - a. determine the location, timing, and desired outcome for fuel break construction and maintenance to meet both Member Company and U.S. Forest Service land management needs for wildfire risk reduction.
 - b. ensure that fuel break construction and maintenance on NFS land takes full advantage of natural and man-made features (e.g. active, closed, and decommissioned roads) to optimize fuel break effectiveness.
 - c. consult on road decommissioning on NFS land adjacent to Member Company land to consider fuel break values.
 - d. Discuss and evaluate the use of Member Company resources to construct and maintain fuel breaks on or affecting NFS land where the fuel break -
 - i. crosses NFS and adjacent Member Company land,
 - ii. is entirely on NFS land adjacent to Member Company land, or
 - iii. is entirely on Member Company land adjacent to NFS land and the predominant benefit accrues to the USFS.
- D. Use all available planning and implementation authorities to expedite federal decision-making for fuel breaks on NFS lands.
- E. Cooperate in external communications regarding fuel break construction as well as other fuel management in the larger planning area that helps meet overall risk mitigation objectives.
- F. Coordinate with Member Companies on reporting the outcomes of fuel break construction and maintenance, including the effectiveness of fuels breaks in wildfire prevention or suppression, and determine how to appropriately monitor completed work for ongoing effectiveness.
- G. Ensure that Line Officers, and other agency specialists, maintain a direct line of communication with Member Companies and Company Liaisons during fuel break planning and implementation on or adjacent to NFS lands and private ownerships to ensure good coordination and adherence to law applicable to federal and/or private jurisdictions.
- H. Consider all implementation instruments and authorities (including but not limited to Stewardship authority, service contracts, traditional timber sale contracts, cooperative agreements, grants, etc) in meeting the intent of the MOU.



IV. IT IS MUTUALLY UNDERSTOOD AND AGREED BY AND BETWEEN THE PARTIES THAT:

- A. As agreed to in individual implementation instruments, such as contracts or agreements, ensure that Member Companies constructing fuel breaks on NFS land adhere to all applicable federal laws and policies.
- B. PRINCIPAL CONTACTS. Individuals listed below are authorized to act in their respective areas for matters related to this agreement.

National Points of Contact:

NAFO Program Contact	NAFO Administrative Contact
Bryan Petit Vice President for Policy and Reg. Affairs 122 C Street, NW, Suite 630 Washington, DC 20001 Telephone: 202-747-0741 Email: bpetit@nafoalliance.org	Jonathan Tyree Vice President for Operations 122 C Street, NW, Suite 630 Washington, DC 20001 Telephone: 202-747-0753 Email: jtyree@nafoalliance.org

Principal U.S. Forest Service Contacts:

U.S. Forest Service Program Contact	U.S. Forest Service Program Contact
Jeff Marsolais Associate Deputy Chief State, Private, Tribal and Forestry Telephone: 202-644-4608 Email: jeffrey.marsolais@usda.gov	Maureen Bookwalter Deputy Chief of Staff State, Private, Tribal and Forestry Telephone: 406-329-3146 Email: maureen.a.bookwalter@usda.gov

- C. NOTICES. Any communications affecting the operations covered by this agreement given by the U.S. Forest Service or NAFO is sufficient only if in writing and delivered in person, mailed, or transmitted electronically by e-mail or fax, as follows:

To the U.S. Forest Service Program Manager, at the address specified in the MOU.

To NAFO, at NAFO's address shown in the MOU or such other address designated within the MOU.

Notices are effective when delivered in accordance with this provision, or on the effective date of the notice, whichever is later.



- D. PARTICIPATION IN SIMILAR ACTIVITIES. This MOU in no way restricts the U.S. Forest Service or NAFO from participating in similar activities with other public or private agencies, organizations, and individuals.
- E. ENDORSEMENT. Any of NAFO's contributions made under this MOU do not by direct reference or implication convey U.S. Forest Service endorsement of NAFO's products or activities.
- F. NONBINDING AGREEMENT. This MOU creates no right, benefit, or trust responsibility, substantive or procedural, enforceable by law or equity. The parties shall manage their respective resources and activities in a separate, coordinated and mutually beneficial manner to meet the purpose(s) of this MOU. Nothing in this MOU authorizes any of the parties to obligate or transfer anything of value.

Specific, prospective projects or activities that involve the transfer of funds, services, property, and/or anything of value to a party requires the execution of separate agreements and are contingent upon numerous factors, including, as applicable, but not limited to: agency availability of appropriated funds and other resources; cooperator availability of funds and other resources; agency and cooperator administrative and legal requirements (including agency authorization by statute); etc. This MOU neither provides, nor meets these criteria. If the parties elect to enter into an obligation agreement that involves the transfer of funds, services, property, and/or anything of value to a party, then the applicable criteria must be met. Additionally, under a prospective agreement, each party operates under its own laws, regulations, and/or policies, and any Forest Service obligation is subject to the availability of appropriated funds and other resources. The negotiation, execution, and administration of these prospective agreements must comply with all applicable law.

Nothing in this MOU is intended to alter, limit, or expand the agencies' statutory and regulatory authority.

- G. USE OF U.S. FOREST SERVICE INSIGNIA. In order for NAFO to use the U.S. Forest Service insignia on any published media, such as a Web page, printed publication, or audiovisual production, permission must be granted from the U.S. Forest Service's Office of Communications. A written request must be submitted and approval granted in writing by the Office of Communications (Washington Office) prior to use of the insignia.
- H. MEMBERS OF U.S. CONGRESS. Pursuant to 41 U.S.C. 22, no U.S. member of, or U.S. delegate to, Congress shall be admitted to any share or part of this agreement, or benefits that may arise therefrom, either directly or indirectly.
- I. FREEDOM OF INFORMATION ACT (FOIA). Public access to MOU or agreement records must not be limited, except when such records must be kept



confidential and would have been exempted from disclosure pursuant to Freedom of Information regulations (5 U.S.C. 552).

- J. TEXT MESSAGING WHILE DRIVING. In accordance with Executive Order (EO) 13513, "Federal Leadership on Reducing Text Messaging While Driving," any and all text messaging by Federal employees is banned: a) while driving a Government owned vehicle (GOV) or driving a privately owned vehicle (POV) while on official Government business; or b) using any electronic equipment supplied by the Government when driving any vehicle at any time. All cooperators, their employees, volunteers, and contractors are encouraged to adopt and enforce policies that ban text messaging when driving company owned, leased or rented vehicles, POVs or GOVs when driving while on official Government business or when performing any work for or on behalf of the Government.
- K. U.S. FOREST SERVICE ACKNOWLEDGED IN PUBLICATIONS, AUDIOVISUALS AND ELECTRONIC MEDIA. NAFO shall acknowledge U.S. Forest Service support in any publications, audiovisuals, and electronic media developed as a result of this MOU.
- L. NONDISCRIMINATION STATEMENT – PRINTED, ELECTRONIC, OR AUDIOVISUAL MATERIAL. NAFO shall include the following statement, in full, in any printed, audiovisual material, or electronic media for public distribution developed or printed with any Federal funding.

In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. (Not all prohibited bases apply to all programs.)

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.

If the material is too small to permit the full statement to be included, the material must, at minimum, include the following statement, in print size no smaller than the text:

"This institution is an equal opportunity provider."



- M. TERMINATION. Any of the parties, in writing, may terminate this MOU in whole, or in part, at any time before the date of expiration.
- N. DEBARMENT AND SUSPENSION. NAFO shall immediately inform the U.S. Forest Service if they or any of their principals are presently excluded, debarred, or suspended from entering into covered transactions with the federal government according to the terms of 2 CFR Part 180. Additionally, should NAFO or any of their principals receive a transmittal letter or other official Federal notice of debarment or suspension, then they shall notify the U.S. Forest Service without undue delay. This applies whether the exclusion, debarment, or suspension is voluntary or involuntary.
- O. MODIFICATIONS. Modifications within the scope of this MOU must be made by mutual consent of the parties, by the issuance of a written modification signed and dated by all properly authorized, signatory officials, prior to any changes being performed. Requests for modification should be made, in writing, at least 30 days prior to implementation of the requested change.
- P. COMMENCEMENT/EXPIRATION DATE. This MOU is executed as of the date of the last signature and is effective five years from date of last signature, at which time it will expire.



Q. AUTHORIZED REPRESENTATIVES. By signature below, each party certifies that the individuals listed in this document as representatives of the individual parties are authorized to act in their respective areas for matters related to this MOU.

In witness whereof, the parties hereto have executed this MOU as of the last date written below.

DAVID P. TENNY, President and CEO
National Alliance of Forest Owners

Date

RANDY MOORE, Chief
USDA, Forest Service

Date

The authority and format of this agreement have been reviewed and approved for signature.

RONALD PRESSLEY
Grants & Agreements Specialist
USDA, Forest Service

Date

Burden Statement

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0596-0217. The time required to complete this information collection is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at 202-720-2600 (voice and TDD).

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call toll free (866) 632-9992 (voice). TDD users can contact USDA through local relay or the Federal relay at (800) 877-8339 (TDD) or (866) 377-8642 (relay voice). USDA is an equal opportunity provider and employer.



FS Agreement No. 23-MU-11132540-007

Cooperator Agreement No. _____

**MEMORANDUM OF UNDERSTANDING
Between The
NATIONAL ALLIANCE OF FOREST OWNERS
And The
USDA, FOREST SERVICE
WASHINGTON OFFICE, STATE, PRIVATE AND TRIBAL FORESTRY**

This MEMORANDUM OF UNDERSTANDING (MOU) is hereby made and entered into by and between the National Alliance of Forest Owners, hereinafter referred to as “NAFO,” and the United States Department of Agriculture (USDA), Forest Service, Washington Office, State, Private and Tribal Forestry, hereinafter referred to as the “U.S. Forest Service.”

Background: Increasingly intensive fire seasons severely impact the environment, local and regional economies, and public health. They also cause significant resource damage on private working forests, which annually provide 90% of the timber harvest for mills and 80% of the net forest carbon sequestration in the United States. Wildfire impacts on private working forests are pervasive throughout the country and especially acute in western states experiencing historic drought conditions. Federal, state, and private forest owners and managers have a shared stewardship responsibility to protect natural resources and the communities that depend on them, especially during fire season. Yet worsening conditions are making stewardship objectives more difficult to achieve. Notwithstanding increases in federal firefighting resources, local fire officers and incident commanders often face difficult choices on how to best deploy limited personnel and equipment to attack and extinguish fires during the height of fire season. To help address these challenges, the U.S. Forest Service and NAFO are partnering to devise a plan that will allow for formal arrangements directly with private resources to fight fire in areas of adjacent ownership. This partnership will give field officers and incident commanders more tools to keep fires small and less dangerous, local knowledge and experience to maintain safe firefighting operations, and help to better identify and evaluate safety risks and opportunities. It will also enable federal, state, and private forest owners to better achieve outcomes that protect the resources and communities in their shared stewardship.

Title: Coordination to Enhance Wildland Firefighting Response Capabilities Through Private Resources

- I. **PURPOSE:** The purpose of this MOU is to facilitate the cooperation between the parties to increase available wildfire suppression resources, strengthen initial and extended attack capabilities, coordinate on the ground tactical decisions, and



achieve increased overall suppression effectiveness on lands with adjacent National Forest System lands and private ownerships in accordance with the following provisions.

II. STATEMENT OF MUTUAL BENEFIT AND INTERESTS:

The National Alliance of Forest Owners (NAFO) is a national advocacy organization committed to advancing federal policies that ensure private working forests provide clean air, clean water, wildlife habitat and jobs through sustainable practices and strong markets. NAFO presently has 48 member companies that own and manage more than 46 million acres of private working forests. NAFO's membership also presently includes 34 state and national associations representing tens of millions of additional acres of forestland.

The U.S. Forest Service is one of the federal land management agencies under the Department of Agriculture that manages 193 million acres of land. The mission of the U.S. Forest Service is to sustain the health, diversity, and productivity of the nation's forests and grassland to meet the needs of the present and future generations.

NAFO and the U.S. Forest Service share a mutual interest in working with private resources and are mutually committed to the following:

1. Sustainable forest management and the long-term health of natural resources including clean air, clean water, and wildlife habitat.
2. Prioritizing the safety and protection of communities, critical infrastructure, timberlands, air and water quality, wildlife habitat, and other valuable public and private assets.
3. The importance of forests to climate mitigation and the value of maintaining and increasing mitigation benefits over time.
4. The urgency of finding enduring solutions to address the threats of drought, fire, and other natural disturbances that jeopardize the environment, communities, businesses, private property, and social well-being.
5. Effective, efficient, and safe fire suppression operations optimizing the use of available resources through, close coordination, communication, prioritization, and execution.
6. Pooling and optimizing firefighting personnel and assets to strengthen initial attack and seek to achieve full suppression through initial attack during the fire season.
7. A strong partnership to achieve these mutual objectives.



In consideration of the above premises, the parties agree as follows:

III. NAFO SHALL:

- A. Provide national points of contact (National POCs) for participating NAFO member company (Member Company) liaisons (Company Liaisons) to coordinate further Regional and Forest unit level discussions and actions supported by this MOU. See attached addendum.
- B. Proactively engage the U.S. Forest Service through Company Liaisons at the necessary Regional or Forest unit level, the State, and applicable local fire organization in pre-fire season planning including but not limited to:
 - a. coordinating the applicable acquisition tool/arrangement for the Member Company,
 - b. assessing risks,
 - c. aligning on designated protection areas (DPAs),
 - d. identifying suppression priorities,
 - e. and identifying and determining optimal use of firefighting resources made available by the Member Companies.
- C. Ensure Member Companies maintain lists of qualified resources, identify training and certification standards applicable to Member Companies, and ensure compliance with NWCG PMS 310-1 “Wildland and Prescribed Fire Qualification and System Guide” or with applicable state training and qualification standards.
- D. Ensure that all Member Company aircraft used on National Forest System Lands have been approved by the U.S Forest Service in accordance with policy documented in Interagency Standards for Fire and Fire Aviation Operations, Chapter 16: Aviation Operations & Resource, Cooperator Aircraft section.
- E. Ensure that available firefighting resources identified by Member Companies through pre-fire season planning are coordinated through Company Liaisons during fire season for use on incidents impacting Member Company land adjacent to National Forest System land.
- F. Ensure that all Member Company resources are properly trained in accordance with federal or state policies and adhere to all relevant safety requirements established in Federal or State policy. This includes personal protective equipment (PPE) and common communications for all personnel assigned to fire line suppression duties on National Forest System lands.
- G. Ensure the National POCs, Member Companies and Company Liaisons cooperate in external communications regarding joint fire suppression efforts with the U.S. Forest Service.



- H. Ensure Member Companies are registered in SAM.gov when they intend to enter into future arrangements involving the federal transfer of funds in exchange for fire suppression activities by Member Companies.
- I. If the Member Company is recognized or covered under any statewide cooperative fire protection agreement (Statewide Agreement), NAFO shall ensure Member Company firefighting resources meet qualification standards as outlined in the Statewide Agreement.
- J. Company Liaisons initiate communication with each applicable State to determine if the Member Company may fall under the authority of an active Statewide Agreement.

IV. THE U.S. FOREST SERVICE SHALL:

- A. Communicate the content and intent of this MOU to the regional and local unit Line Officers within the agency and with other Federal and State partners.
- B. Provide designated national points of contact (National POCs) and regional and local unit liaisons (Federal Liaisons) to coordinate further discussions and actions supported by this MOU. See attached addendum.
- C. Proactively encourage regional and local unit Line Officers to include Member Companies and Company Liaisons in pre-fire season planning to:
 - a. coordinate applicable acquisition tool/arrangement for the specific Member Company,
 - b. assess risks,
 - c. align on designated protection areas (DPAs),
 - d. identify suppression priorities,
 - e. identify and determine optimal use of firefighting resources made available by Member Companies,
 - f. and to establish reasonable expectations regarding the extent to which such resources shall be used during wildfire incidents.
- D. Establish the expectation among regional or local unit Line Officers to proactively use firefighting resources provided by Member Companies for initial attack on adjacent National Forest System land and private ownerships during fire season and request mutual aid when needed.
- E. To the extent legally authorized, expedite the use of firefighting resources made available by Member Companies or their contractors based on the agreement or contract executed with the U.S. Forest Service or pursuant to an existing Statewide Agreement.



- F. Ensure that Line Officers, Agency Administrators, and Incident Commanders maintain a direct line of communication with Member Companies and Company Liaisons during incidents impacting adjacent National Forest System lands and private ownerships to ensure good coordination, the effective use of firefighting and the prudent use of any backfires that could damage lands owned or managed by Member Companies.
- G. Provide Line Officers and Incident Commanders the necessary flexibility within legal authorities to use firefighting resources provided by Member Companies, individually or in conjunction with State agencies or recognized protection organizations, to aggressively attack and suppress wildfires impacting adjacent National Forest System lands and private ownerships and to engage in suppression actions 24 hours a day, seven days a week, provided firefighting crews provided by Member Companies observe established safety requirements in accordance with established Federal or State policies.
- H. Cooperate with Member Companies in external communications regarding joint fire suppression efforts.

V. IT IS MUTUALLY UNDERSTOOD AND AGREED BY AND BETWEEN THE PARTIES THAT:

- A. They will address specific liability within the independent arrangements created between Member Companies and the local or regional units of the U.S. Forest Service.
- B. The U.S. Forest Service shall outline existing authorities and instruments available as possible ways of doing business with Member Companies.
- C. Federal Liaisons and Company Liaisons will engage in further discussions on initial attack and extended attack capabilities consistent with the language and intent of this MOU.
- D. Federal Liaisons and Company Liaisons will cooperatively engage in further discussions on training and qualification standards for Member Companies when fighting fire on National Forest System land consistent with the language and intent of this MOU.
- K. Ensure common communication with appropriate wildland firefighting organizations (radios, frequencies, etc.).
- E. Federal Liaisons and Company Liaisons will work together to develop Operating Plans at the regional or local unit level to define operating procedures and responsibilities consistent with the language and intent of this MOU. No Operating Plan shall be tiered to this MOU.



- F. This MOU shall not obligate any partner to expend funds or involve the agencies in any contract or other obligations for the payment of money.
- G. This MOU is neither a fiscal nor a funds obligation document. Any endeavor involving reimbursement or contribution of funds between the agencies to this MOU will be handled in accordance with applicable laws, regulations and procedures including those for Government procurement and printing. This MOU does not establish authority for noncompetitive awards to the cooperator of any contract or other agreement. Any contract or agreement for other services must fully comply with all applicable requirements for competition.
- H. PRINCIPAL CONTACTS. Individuals listed below are authorized to act in their respective areas for matters related to this agreement.

National Points of Contact:

NAFO Program Contact	NAFO Administrative Contact
Kristin Sleeper Director for Policy and Research 122 C Street, NW, Suite 630 Washington, DC 20001 Telephone: 202-936-6737 Email: ksleeper@nafoalliance.org	Jonathan Tyree Vice President for Operations 122 C Street, NW, Suite 630 Washington, DC 20001 Telephone: 202-747-0753 Email: jtyree@nafoalliance.org

Principal U.S. Forest Service Contacts:

U.S. Forest Service Program Manager Contact	U.S. Forest Service Agreement Contact
Kim Christensen Deputy Assistant Director 3833 S. Development Ave. Boise, ID 83705 Telephone: 208-387-5949 Email: kim.christensen@usda.gov	Sarah Russell Agreements Specialist 3833 S. Development Ave. Boise, ID 83705 Telephone: 986-888-9483 Email: sarah.russell@usda.gov

- I. NOTICES. Any communications affecting the operations covered by this agreement given by the U.S. Forest Service or NAFO is sufficient only if in writing and delivered in person, mailed, or transmitted electronically by e-mail or fax, as follows:

To the U.S. Forest Service Program Manager, at the address specified in the MOU.

To NAFO, at NAFO's address shown in the MOU or such other address designated within the MOU.



Notices are effective when delivered in accordance with this provision, or on the effective date of the notice, whichever is later.

- J. PARTICIPATION IN SIMILAR ACTIVITIES. This MOU in no way restricts the U.S. Forest Service or NAFO from participating in similar activities with other public or private agencies, organizations, and individuals.
- K. ENDORSEMENT. Any of NAFO's contributions made under this MOU do not by direct reference or implication convey U.S. Forest Service endorsement of NAFO's products or activities.
- L. NONBINDING AGREEMENT. This MOU creates no right, benefit, or trust responsibility, substantive or procedural, enforceable by law or equity. The parties shall manage their respective resources and activities in a separate, coordinated and mutually beneficial manner to meet the purpose(s) of this MOU. Nothing in this MOU authorizes any of the parties to obligate or transfer anything of value.

Specific, prospective projects or activities that involve the transfer of funds, services, property, and/or anything of value to a party requires the execution of separate agreements and are contingent upon numerous factors, including, as applicable, but not limited to: agency availability of appropriated funds and other resources; cooperator availability of funds and other resources; agency and cooperator administrative and legal requirements (including agency authorization by statute); etc. This MOU neither provides, nor meets these criteria. If the parties elect to enter into an obligation agreement that involves the transfer of funds, services, property, and/or anything of value to a party, then the applicable criteria must be met. Additionally, under a prospective agreement, each party operates under its own laws, regulations, and/or policies, and any Forest Service obligation is subject to the availability of appropriated funds and other resources. The negotiation, execution, and administration of these prospective agreements must comply with all applicable law.

Nothing in this MOU is intended to alter, limit, or expand the agencies' statutory and regulatory authority.

- M. USE OF U.S. FOREST SERVICE INSIGNIA. In order for NAFO to use the U.S. Forest Service insignia on any published media, such as a Web page, printed publication, or audiovisual production, permission must be granted from the U.S. Forest Service's Office of Communications. A written request must be submitted and approval granted in writing by the Office of Communications (Washington Office) prior to use of the insignia.



- N. MEMBERS OF U.S. CONGRESS. Pursuant to 41 U.S.C. 22, no U.S. member of, or U.S. delegate to, Congress shall be admitted to any share or part of this agreement, or benefits that may arise therefrom, either directly or indirectly.
- O. FREEDOM OF INFORMATION ACT (FOIA). Public access to MOU or agreement records must not be limited, except when such records must be kept confidential and would have been exempted from disclosure pursuant to Freedom of Information regulations (5 U.S.C. 552).
- P. TEXT MESSAGING WHILE DRIVING. In accordance with Executive Order (EO) 13513, "Federal Leadership on Reducing Text Messaging While Driving," any and all text messaging by Federal employees is banned: a) while driving a Government owned vehicle (GOV) or driving a privately owned vehicle (POV) while on official Government business; or b) using any electronic equipment supplied by the Government when driving any vehicle at any time. All cooperators, their employees, volunteers, and contractors are encouraged to adopt and enforce policies that ban text messaging when driving company owned, leased or rented vehicles, POVs or GOVs when driving while on official Government business or when performing any work for or on behalf of the Government.
- Q. PUBLIC NOTICES. It is the U.S. Forest Service's policy to inform the public as fully as possible of its programs and activities. NAFO is encouraged to give public notice of the receipt of this agreement and, from time to time, to announce progress and accomplishments. Press releases or other public notices should include a statement substantially as follows:
- "U.S. Forest Service, Department of Agriculture."
- NAFO may call on the U.S. Forest Service's Office of Communication for advice regarding public notices. NAFO is requested to provide copies of notices or announcements to the U.S. Forest Service Program Manager and to The U.S. Forest Service's Office of Communications as far in advance of release as possible.
- R. U.S. FOREST SERVICE ACKNOWLEDGED IN PUBLICATIONS, AUDIOVISUALS AND ELECTRONIC MEDIA. NAFO shall acknowledge U.S. Forest Service support in any publications, audiovisuals, and electronic media developed as a result of this MOU.
- S. NONDISCRIMINATION STATEMENT – PRINTED, ELECTRONIC, OR AUDIOVISUAL MATERIAL. NAFO shall include the following statement, in full, in any printed, audiovisual material, or electronic media for public distribution developed or printed with any Federal funding.

In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis



of race, color, national origin, sex, age, or disability. (Not all prohibited bases apply to all programs.)

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.

If the material is too small to permit the full statement to be included, the material must, at minimum, include the following statement, in print size no smaller than the text:

"This institution is an equal opportunity provider."

- T. TERMINATION. Any of the parties, in writing, may terminate this MOU in whole, or in part, at any time before the date of expiration.
- U. DEBARMENT AND SUSPENSION. NAFO shall immediately inform the U.S. Forest Service if they or any of their principals are presently excluded, debarred, or suspended from entering into covered transactions with the federal government according to the terms of 2 CFR Part 180. Additionally, should NAFO or any of their principals receive a transmittal letter or other official Federal notice of debarment or suspension, then they shall notify the U.S. Forest Service without undue delay. This applies whether the exclusion, debarment, or suspension is voluntary or involuntary.
- V. MODIFICATIONS. Modifications within the scope of this MOU must be made by mutual consent of the parties, by the issuance of a written modification signed and dated by all properly authorized, signatory officials, prior to any changes being performed. Requests for modification should be made, in writing, at least 30 days prior to implementation of the requested change.
- W. COMMENCEMENT/EXPIRATION DATE. This MOU is executed as of the date of the last signature and is effective through **February 23, 2028**, at which time it will expire.



X. AUTHORIZED REPRESENTATIVES. By signature below, each party certifies that the individuals listed in this document as representatives of the individual parties are authorized to act in their respective areas for matters related to this MOU.

In witness whereof, the parties hereto have executed this MOU as of the last date written below.

DAVID P. TENNY, President and CEO
National Alliance of Forest Owners Date

RANDY MOORE, Chief
USDA, Forest Service Date

The authority and format of this agreement have been reviewed and approved for signature.

SARAH RUSSELL, Agreements Specialist Date
USDA, Forest Service

Burden Statement

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0596-0217. The time required to complete this information collection is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

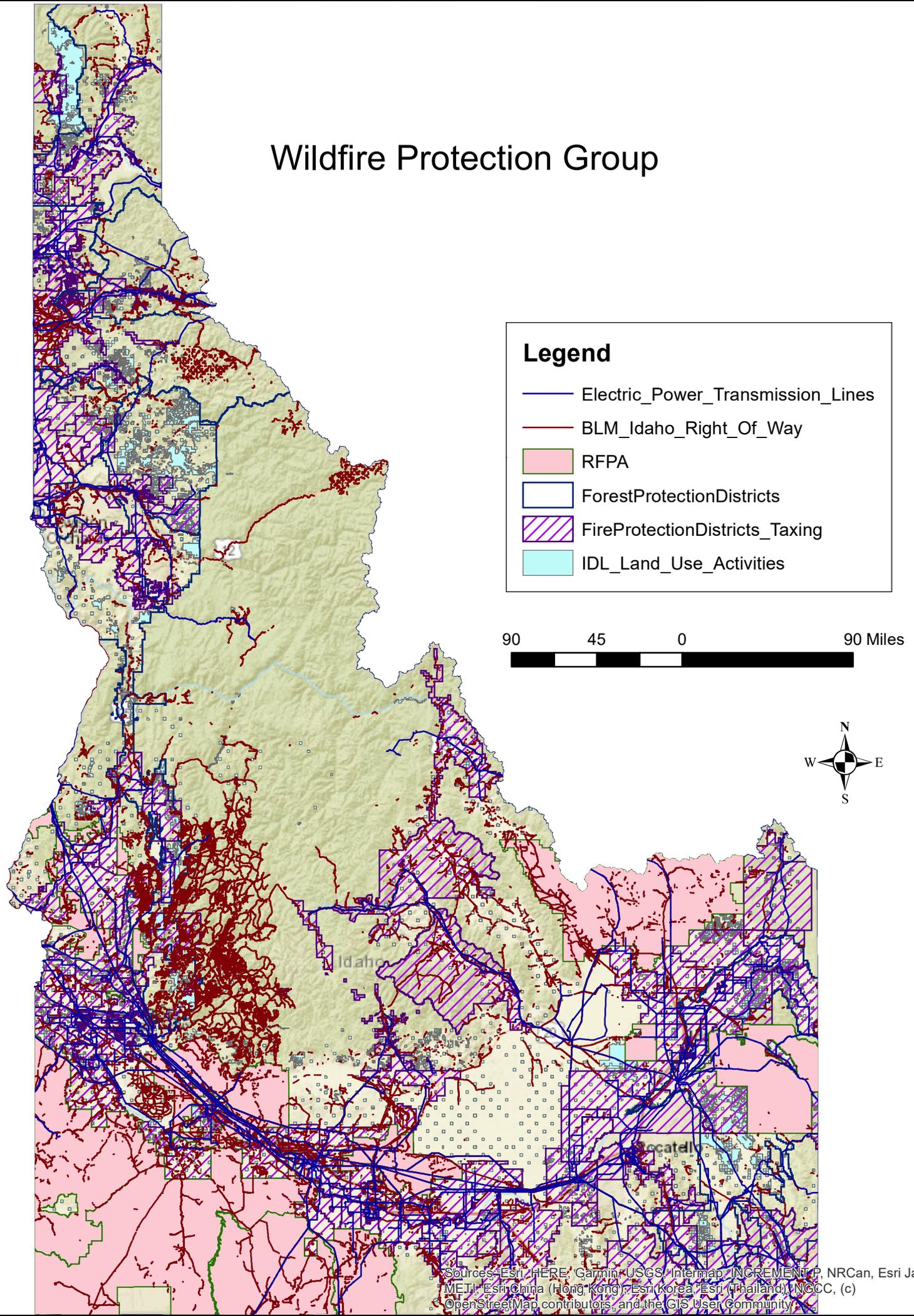
The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at 202-720-2600 (voice and TDD).

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call toll free (866) 632-9992 (voice). TDD users can contact USDA through local relay or the Federal relay at (800) 877-8339 (TDD) or (866) 377-8642 (relay voice). USDA is an equal opportunity provider and employer.

**Addendum A to NAFO / U.S. Forest Service Memorandum of Understanding
FS agreement # 23-MU-11132540-007**

Company	First	Last	Title	Street	City	State	Zip	Office	Cell	Email
Sierra Pacific Industries	Matt	Pontes	Director of Wildfire and Fuels Management	19794 Riverside Avenue	Anderson	CA	96007	5302154362	5303788234	mpontes@spi-ind.com
Hearst Forests	Chris	Chase	Director of Hearst Forests	PO Box 670	McCloud	CA	96057		5416017029	chris.chase@hearst.com
Resource Management Service	Jimmy	Bullock	Senior Vice President, Forest Sustainability	PO Box 245	Bogue Chitto	MS	39629		6012591144	jbullock@resourcemt.com
Weyerhaeuser	Erik	Lease	Director, Silviculture & Regeneration	16821 SE McGillivray Blvd, Suite 112	Vancouver	WA	98683	3604310450		erik.lease@weyerhaeuser.com
Starker Forests	Randy	Hereford	President	PO Box 809	Corvallis	OR	97339	5417404459		randy@starkerforests.com
Manulife Investment Management Forest Management Inc	David	Groeschl	Chief Operating Officer, Western Operations	3918 N Schrieber Way, Suite 100	Coeur d'Alene	ID	83815		2086616867	dgroeschl@manulife.com
Giustina Resources, LLC	Jeremy	Norby	Chief Operating Officer	200 International Way	Springfield	OR	97477	5414851500		jremyn@giustina.com
Green Diamond Resource Company	John	Davis	Vice President/General Manager, Mountain West Timberlands	1301 Fifth Avenue, Suite 2700	Seattle	WA	98101	2062245804	7074995470	jdavis@greendiamond.com
Roseburg Resources Company	Tim	Truax	Oregon Land & Forestry Manager	PO Box 1088	Dillard	OR	97470	5412978704		timt@rfpco.com
Forest Investment Associates	Jack	Stover	NW Operations Manager	7600 NE 41st Street, Suite 325	Vancouver	WA	98662	3609570212		jstover@forestinvest.com
Molpus Woodlands Group	Chad	McElvany	Operations Director - Northwest Region	7600 Government Way, Suite 1	Coeur d'Alene	ID	83815	2087626641x103	2086917676	cmcelvany@molpus.com
PotlatchDeltic	Rich	McMillan	District Forest Manager	410 Johnson Aconue	Orofino	ID	83544	2084641204		rich.mcmillan@potlatchdeltic.com
Lone Rock Resources	Brennan	Garrelts	Director of Government Affairs and Policy	2323 Old Highway 99S	Roseburg	OR	97471	5416730141x112		bgarrelts@lrco.com

Wildfire Protection Group



May 29, 2024

Utility/Insurance Wildfire Workgroup

Report to Governor Brad Little

Co-Chair, Director Dean Cameron, Idaho Department of Insurance

Co-Chair, Max Beach, President, Idaho Consumer-Owned Utilities Association

A collaboration among the Idaho Department of Insurance, Idaho Consumer-Owned Utilities Association, Idaho Power Company, Rocky Mountain Power, Avista Corporation, and Schweitzer Engineering Laboratories

Executive Summary

The Utility Wildfire Workgroup consists of the Idaho Department of Insurance, Idaho Consumer-Owned Utilities Association, Idaho Power Company, Rocky Mountain Power, Avista Corporation, and Schweitzer Engineering Laboratories, and is led by its Chair, Max Beach.

Wildfire is a societal issue and requires engagement from a range of stakeholders, including federal, state, and local regulators, as well as the construction, insurance, timber, and other sectors. The solution must be comprehensive, involving policy change, availability of wildfire-related funding, technology implementation, and collaboration among public and private entities.

The focus of this report is on the electric utility industry and ways that policy, new funding streams, technology, and state and federal agencies can decrease and address wildfire risk in Idaho. However, we recognize that this is just one portion of the work that should be done to address wildfire risks.

We appreciate the opportunity to participate in this workgroup and to provide you with this report of our thoughts and suggestions. The electric utilities represented in this workgroup range in size from 13 employees to well over 2,500 employees and represent members and customers from an urban setting to extremely rural landscapes, and everything in between. We stand ready to answer any questions, and we look forward to continuing to support this important work and potential implementations of the recommendations contained in this report.

Respectfully submitted,

Utility/Insurance Wildfire Workgroup

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Introduction

The risk of wildfire is growing across the United States. The Western U.S. is experiencing longer fire seasons due to patterns of earlier drying and snow melt, and large wildfires are becoming more frequent.¹ Residential development is expanding into forested areas and other locations that are at higher risk for wildfire. For all these reasons, wildfire is becoming a broad societal issue, warranting a comprehensive set of policy solutions that span multiple industries and require government involvement. When wildfires occur, they can pose immediate dangers to human life, risks associated with evacuation, and emergency response challenges. These events can result in hardship due to loss of life, property damage, displacement from homes and communities, and disruption to local economies. As extreme weather events, including catastrophic wildfires, increase in frequency and severity, electric companies and the customers and communities they serve are increasingly challenged to manage the impact of these events and related risks that are within the realm of an electric company's control and ability.

Electric companies provide essential services that drive the economy, are critical to national security, and which customers count on to run their businesses and to go about their daily lives. However, electric companies are a quick target for litigation. While most wildfires are caused by events other than those involving electric companies, such as lightning strikes, climate change, forest management practices, property development in fire-prone areas, and other human activities, wildfire events have the potential to jeopardize electric companies' financial viability. As costs mount in conjunction with the increasing risk of wildfire liability, electric companies are incurring increased costs necessary to make their electrical systems more resilient. At the same time, they are experiencing difficulty procuring wildfire insurance and more costly access to capital. These impacts are the result of a societal trend of placing utilities in the position of being unreasonably held responsible for economic and emotional damages resulting from fires, even before causation or fault is established. This trend is exacerbated as insurance companies increase premiums and struggle to assess wildfire risk for utilities, as well as residential and commercial property owners.

Even before the cause of a wildfire is determined, wildfire can affect a utility's financial health if the utility's infrastructure is suspected of being involved in the cause of or contributing to a fire. This threat can immediately destabilize the financial health of electric companies and challenge their ability to raise

¹ Wildfire in the West, <https://www.uidaho.edu/news/climate-change/wildfire>

capital. In several recent instances,² electric companies were sued within days of the fire igniting, leading to an immediate drop in the stock price of investor-owned utilities and warnings from rating agencies, all prior to a determination of cause or origin of the fire.

For all of Idaho's electric companies, including not-for-profit rural electric cooperatives, municipal power utilities, and investor-owned utilities, wildfire insurance premiums have drastically increased while access to reinsurance is limited or exceedingly cost-prohibitive. Consumer-owned utilities, provide low-cost, reliable power to primarily rural parts of Idaho with lower population density and lower median incomes. The losses a utility would face due to massive liability claims would be devastating to the communities they serve. The overhanging risk of wildfire liability and the financial community's reticence to take on that risk degrades electric companies' access to affordable financing to fund ongoing operations and sustain critical capital investments in resilience and reliability. All of which has the ultimate impact of increasing utility rates paid by customers.

Regardless of electric companies' ownership and governance model (e.g., consumer-owned (not-for-profit), public, or investor-owned), legislative and regulatory support for their financial integrity is critical. Utilities need clear liability standards, certainty of rate recovery for wildfire mitigation costs, and involvement of multiple stakeholders in cost-sharing and risk mitigation. These solutions are necessary for electric utilities to continue to serve cost-effectively and reliably. Given the increasing risk of wildfire and its associated dangers, state-level action is warranted immediately. We appreciate your attention to this important issue and consideration of the recommendations that follow in this report.

² Recent examples include the August 2023 Maui Wildfire in Hawaii, the August 2023 Gray Fire in Medical Lake, Washington, and the February/March 2024 Smokehouse Fire in Texas and Oklahoma.

Policy Changes:

What policy changes are needed to help Idaho better respond to wildfires? Are there regulatory burdens that must be addressed? If a solution requires legislation, must it happen at the federal or state level, or both?

RECOMMENDATIONS:

The Utility Workgroup recommends:

- 1. State-level legislation adopting clear wildfire liability standards for electric utilities based upon utilities implementing wildfire mitigation measures contained in their Wildfire Mitigation Plans;*
- 2. State-level legislation allowing electric utilities to manage vegetation and remove risk trees within the designated right-of-way or easement area where the utility does not have that right under existing permits or recorded easements;*
- 3. State-level legislation setting caps for non-economic damages related to wildfire and suppression costs;*
- 4. State-level legislation expanding securitization to apply to utility wildfire-related costs; and*
- 5. State-level legislation establishing a state catastrophic wildfire fund.*

Idaho’s electric companies are committed to partnering with customers, communities, and those who manage forest landscapes and fight fires; in demonstrating this commitment electric companies are making significant investment to do our part protect customers, communities, and the energy grid from wildfires. Utility wildfire prevention efforts include regular inspection and maintenance of electrical equipment, investment in infrastructure to reduce spark ignition outage events, enhanced vegetation management, expanded situational awareness capabilities, and partnering with emergency first responders before, during, and after fire events. Yet, the



risk of wildfire is still present in the western United States, and liability for third-party losses related to wildfire poses a threat to the health of electric utilities.

The threat of significant liability for third-party losses can immediately destabilize the financial health of electric companies and the overhanging risk of wildfire liability degrades electric companies' access to affordable financing to fund ongoing operations and sustain critical capital investments in resilience and reliability. The financial community—particularly the credit rating agencies and investors—need to retain confidence in the financial health of both utilities and the regulatory model. This confidence of the financial community helps to ensure continued access to capital, which utilities need when wildfires occur because it allows for funding ongoing operations and sustaining critical capital investment in resilience and wildfire mitigation efforts. If faced with the potential of liability following a wildfire, an electric company's access to capital is impaired by doubts about its viability and the investor-owned utility regulated business model. Today, the costs associated with utility measures to reduce wildfire exposure, insure against wildfire risk, and, when regulators deem appropriate, recover from wildfires are absorbed by customers in utility rates. Utilities provide living wage jobs and are often the economic backbone of the communities they serve; the losses a utility would face due to massive liability claims would be devastating to those communities.

Electric companies acting prudently to reduce wildfire risks, based on broad but differentiated risk-based criteria, should not be exposed to liability for all wildfire damages regardless of fault, causation, or negligence. To ensure that capital remains available to Idaho utilities and to maintain the confidence of the financial community, Idaho electric companies need comprehensive legislation and cooperation from government land management agencies.

Idaho guards its right to regulate at the state level; Idaho communities and elected officials know and understand the unique geography, culture, and challenges and opportunities of the State of Idaho. As such, the utility workgroup recommends state-level legislation addressing standards of care based upon demonstrated wildfire mitigation measures, electric utility vegetation management rights and obligations, liability caps, options for securitized rate recovery for costs incurred because of wildfire, and creation of a state catastrophic wildfire fund.

The utility workgroup also recommends legislation or changes to existing state policy with respect to agency and environmental permitting requirements. Utilities are often delayed by agency and environmental permitting requirements as they implement vegetation management and grid hardening programs, and such a delay impacts the timing, scope, and effectiveness of these risk mitigation programs.

The Utility Workgroup also requests your support and advocacy of federal policy change, which is being explored by industry groups such as public power groups and the Edison Electric Institute. Areas ripe for policy change at the federal level include adopting more efficient permitting processes for right-of-way maintenance and grid hardening targeted at reducing wildfire risk, including streamlined National Environmental Policy Act (NEPA) and other permitting processes, and addressing strict liability requirements included in rights-of-way and permits on federal lands. The Utility Workgroup would also encourage your support of Price-Anderson Act-like federal legislation defining wildfire liability for electric utilities.

Funding Solutions:

Are there funding gaps that exist which inhibit response to wildfires? What funding solutions exist and CURRENT funding streams are available to help? What are other states doing?

RECOMMENDATIONS:

The Utility Workgroup recommends:

- 1. Continued funding of Idaho Office of Energy and Mineral Resources (OEMR) grants for wildfire resiliency, mitigation, and backup generation;*
- 2. Continued support for and pursuit and acceptance of Infrastructure Investment and Jobs Act (IIJA) grant funds for energy resilience and wildfire mitigation;*
- 3. Adoption of policies supporting a presumption of rate recovery for wildfire mitigation costs prudently incurred by Idaho's investor-owned utilities; and*
- 4. Adoption of policies supporting changes to insurance structures – ensuring that both electric companies and homeowners can obtain insurance.*

Communities and utilities alike need certainty with respect to appropriate funding mechanisms to help mitigate and respond to wildfire events. Idaho's electric companies are making significant investments into programs to ensure they do their part to reduce wildfire risk for the safety of their customers and communities. The utility workgroup recommends adoption of policies in Idaho that support a presumption that electric companies can recover in rates the costs prudently incurred for wildfire mitigation.

Some Idaho electric companies have begun working in tandem with Idaho communities through funding and programmatic delivery of fuels reduction and safe tree options. This is only a start, however, and the state would benefit from continued emphasis on partnership opportunities among the State and its citizens, federal land management agencies, and electric companies to better mitigate and respond to wildfire events. One example of a state funding opportunity related to wildfire mitigation involves providing financial assistance for elderly, disabled, or financially constrained property owners for fuels mitigation and other efforts to make their homes less vulnerable to ignition from a wildfire. Another opportunity would be creation of a property insurance program for homeowners who are unable to obtain insurance through the market.

Electric companies face an increasing challenge in ensuring adequate financial liquidity is available to continue operating after a wildfire event. Electric companies need liquidity to maintain daily operations, respond to a wildfire event, and ensure continued access to capital for both recovery and funding ongoing operations. They also need access to capital for sustaining critical capital investment in resilience and wildfire mitigation efforts. Doubts about electric companies' abilities to absorb and adequately mitigate the risk associated with wildfire will negatively impact these companies' access to necessary funding.

These concerns about liquidity and access to capital are partly driven by the difficulty in obtaining affordable wildfire insurance. Homeowners also experience this and are increasingly unable to procure wildfire coverage through their property insurance and often do not employ adequate strategies to protect their property from wildfire. Liquidity and access to capital concerns are also driven by the absence of necessary mechanisms to raise capital or provide access to additional liquidity in response to wildfire events. Electric companies need additional tools to address this issue. Such tools could include the ability to employ additional risk transfer mechanisms such as insurance captives³; the ability to utilize securitized instruments such as recovery bonds for wildfire mitigation costs; and partnership with other stakeholders in the creation of a wildfire fund mechanism to provide timely compensation to victims of catastrophic wildfire events. Utah and California have both addressed these issues and provide examples of what policies could be considered..

Funding examples that are currently in place or under consideration in Idaho include:

- *Avista Safe Tree Program.* Under this voluntary program customers can opt in for removal of trees outside the right-of-way, but which pose a potential risk to electrical infrastructure. This program has no up-front cost to customers.

³ Captive insurance is a type of self-insurance where a newly created subsidiary insurer provides insurance for the parent company itself. In other words, a captive insurance company is a wholly owned subsidiary insurer formed by the parent company to provide another method of financing risk to the parent company or related entities.

Captives can be created to cover risks beyond what is, or can be, covered under traditional commercial insurance, or garner more control over losses, reinsurance, and other insurance costs.

- *Idaho Power Right Tree, Right Place Program.* Under this program, Idaho Power consults with customers and commercial developers on planting appropriate trees for specific locations, to ensure that selected trees will not grow directly into the envelope around electric infrastructure.
- *Fuel reduction agreements between utilities and state or local agencies.* An example of this is an agreement between Avista and Bonner County Department of Emergency Management (DEM), in coordination with Idaho Department of Lands (IDL). Under the agreement, Avista funds up to \$150,000 of fuels mitigation annually, which the DEM prescribes and completes for treatment in Bonner County.
- *Partnership driven fuels reduction projects.* In Southern Idaho, Idaho Power is working with Idaho Department of Lands, U.S. Forest Service, Bureau of Land Management, U.S. Fish and Wildlife Service, local counties, fire protection organizations, and several non-profits to plan for and implement large-scale risk reduction projects aimed at protecting local communities and the grid from wildfire. The effort includes projects that span across two million acres and incorporate partner-driven strategies for vegetation management, including cutting away or thinning trees that can act as fuel adjacent to power lines and critical infrastructure. The partnership approach has provided a conduit for identifying, leveraging, and securing additional implementation funding from various sources that might not be available to a single group and are amplifying investment in fuels reduction work. Over the next 10 years, partners in this initiative expect additional investments of more than \$180M in projects to reduce wildfire risk in southern Idaho, which should demonstrate a holistic, community-built solution for addressing wildfire risk.
- *Funding for medically vulnerable populations for generator or battery backup programs.* Typically, utilities do not have access to information on their customers who are on durable medical devices. Electric companies would like to explore partnerships with the state to administer grants or rebate programs aimed at medically vulnerable populations. Public Safety Power Shutoff events may result in prolonged outages for customers on medical equipment, and the State can play a role in helping to identify and administer programs for medically vulnerable populations.
- *Federal and state grant opportunities.*
 - In 2023, Avista was awarded approximately \$1 million in grant funding for wildfire mitigation technologies as part of the Advanced Solutions for Wildfire Mitigation federal



grant project. The grant was awarded as part of the United States Department of Energy Grid Resilience and Innovation Partnership (GRIP) program. Avista will use the grant to install ten wildfire mitigation cameras within its service territory.

- In 2022 and 2023, Idaho Power was awarded two separate grants from the Idaho Office of Energy and Mineral Resources (OEMR), totaling \$350,000, to support wrapping wood electrical poles with fire-resistant mesh wrap and to pilot an artificial intelligence vegetation management effort.
- Currently, Avista is leading a federal grant application for Round 2 of the GRIP program with twelve other regional utilities to develop wildfire/all hazards mitigation tools including a wildfire risk dashboard and weather modeling specific to the northwest. The grant application is requesting close to \$200 million in grant dollars to support wildfire/all hazards mitigation activities across four states. Avista will learn if it received the grant in Summer/Fall 2024. In 2022, many of Idaho's consumer-owned utilities were awarded grants through OEMR's Energy Resiliency Grant Program. Examples of projects funded include but are not limited to satellite analytics for vegetation management, transmission easement widening, SCADA upgrades, pole mesh and vegetation management equipment, and advanced feeder relay protection projects. Idaho Power is a partner to an additional \$200 million grant proposal titled Increasing Energy Resilience via Technology Investment Acceleration (INERTIA). The project brings together a unique coalition of small-, mid- and large size grid operators, technology providers, national laboratories, academic, and community partners in a regional partnership. Grid operators will deploy a suite of critical and complementary technologies designed to rapidly improve grid resilience and reduce impacts to high-risk communities from extreme disruptions, such as major wind events, ice storms, and wildfires. The project will facilitate the routine sharing of experiences, lessons learned, and other relevant tacit and explicit knowledge among utility, laboratory, educational, and community partners to accelerate the accumulation of benefits and increase the scale of deployment of these cutting-edge, market-ready technologies by reducing deployment risks. The project will further support the acceleration and overall effectiveness of the technology deployments by assessing and directly supporting each grid operator's use and integration of data across new and existing platforms. The project will prioritize data quality, governance, and integration enhancements that improve grid operator visibility and responsiveness.

- In the next 3-6 months of 2024 many of Idaho's consumer-owned and investor-owned utilities will also receive notification regarding their applications for additional wildfire resiliency funding from the United States Department of Energy – sub-awarded through OEMR.

Technology/Collaboration:

How many companies exist that have emerging technologies to make our communities safer? What technology exists to help all stakeholders' awareness level surrounding fire?

RECOMMENDATIONS:

The Utility Workgroup recommends:

- 1. Continued collaboration among Idaho electric companies and those located throughout the United States to share lessons learned with new technologies and practices;*
- 2. Continued collaboration among utility, laboratory, educational, and community partners to advance development, research, and understanding of benefits of new technologies for prudent deployment of those market-ready technologies; and*
- 3. Coordination between communities, emergency management, and electric utilities to identify the critical infrastructure (water systems, communication, emergency services) that would benefit from some type of backup power supply during extended outages and state-level support to expeditiously deploy backup power to critical infrastructure.*

As the risk of wildfire increases, utilities are making substantial investments with the goals of preventing, mitigating, and reducing the impact of wildfires; additionally, utilities are adopting public safety power shutoff (PSPS) plans when appropriate based upon weather conditions and the unique characteristics of each utilities' service territory. Analysis by the Edison Electric Institute (EEI) shows that approximately 35 percent of the overall capital investor-owned electric companies spend for transmission and distribution goes to adaptation, hardening, and resilience investment.

Hardening and resiliency investments involve strengthening infrastructure to withstand and minimize the impact of wildfires. This investment also reduces the probability of faults that can lead to ignitions. Many utilities are incorporating new materials to reduce the potential of failure — such as covered conductor, steel poles, and fiberglass crossarms — and installing equipment



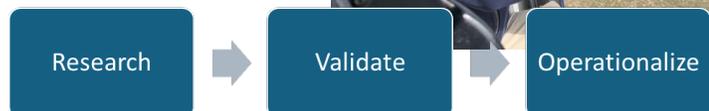
that enables sectionalization and load transfer flexibility to help reduce the number of customers impacted during Public Safety Power Shutoff events.

The integration of both science and advancements in technology play a significant role in wildfire mitigation and can supplement current mitigation practices. The adoption of emerging technology is multi-phased and includes researching solutions and validating capabilities and benefits prior to operationalizing. The phased approach typically requires a multi-year roadmap prior to broad grid implementation to ensure any new technology is realizing its intended benefits. Several manufacturers and vendors exist that provide products aimed at reducing the risk of wildfire and identifying imminent failures. Utilities continue to study the adoption of and investment in new technologies, including advanced monitoring systems, such as remote sensing and aerial surveillance, to detect potential fire threats.

Every electric utility's system and operating territory is unique, and as such, the adoption of technologies will vary from utility to utility based on a multitude of factors, including prudence and risk-based analysis and compatibility and integration with existing systems. Examples of technologies that electric companies are currently investing in or considering include advanced fault detection systems; artificial intelligence and machine learning for weather forecasting, fire behavior modeling, and advanced inspections; satellite and aerial imaging for identifying and monitoring vegetation risk; and pole loading and modeling.

Defense in Depth Strategy

Reducing the risk of wildfire should be addressed with a multiple-layer or defense-in-depth strategy. For example, virtually all wildfire mitigation plans include vegetation management and asset inspections; the goals of these are to reduce the likelihood of a fault (excluding faults that may be caused by a third party, such as car-hit-pole events or mylar balloons). Electric utilities also consider complementary layers of defense, many of which involve new or evolving technology, to address other ignition drivers. For example, advanced overcurrent protection helps reduce the energy associated with faults regardless of how they are caused by reducing fault-clearing times. Technology may also be



used to direct maintenance activities with condition-based monitoring or line monitoring features. Enabling real-time monitoring improves situational awareness and can provide advanced notification of emerging issues. While utilities are integrating technology to supplement mitigation activities, the broad deployment involves a phased approach that includes researching the technology and potential benefits followed by validation prior to operationalizing or installing on the power system. This process takes time to complete and limits the fast deployment of new or unproven technology. Collaboration between the State, universities, utilities, and other stakeholders would enable a more rapid approach and help utilities deploy new technology in a faster time period.

Staffing and Supply Chain Limitations

Staffing and supply chain challenges can limit the rate at which technologies can be deployed. Proper design, installation, and commissioning of equipment requires highly skilled personnel who have completed four or more years of specialized post-secondary training through both advanced degrees and apprenticeships. To keep electricity rates affordable, electric companies source replacement equipment and staff construction personnel based on useful equipment life — electric company equipment often has a useful life of 20 or more years.

Moreover, as stated above, the adoption of emerging technologies is multi-phased; the time from pilot installation of technology to systemwide deployment can exceed seven years.⁴

Enabling Technologies

The integration of advanced technology plays an important role in wildfire mitigation. Remote sensors and advanced protection schemes typically require communication capabilities to improve situational

⁴ For example, PPL Electric Utilities Corporation of Pennsylvania initiated a High-Impedance Fault Detection technology in 2015, deployed systemwide in 2022. M. Kistler, F. Heleniak, C. Kennedy, and G. Maday, “Practical Experience With High-Impedance Fault Detection in Distribution Systems—Continued,” proceedings of the 49th Annual Western Protective Relay Conference, Spokane, WA, October 2022; M. Kistler, F. Heleniak, and T. Varshney, “Practical Experience With High-Impedance Fault Detection in Distribution Systems,” proceedings of the 46th Annual Western Protective Relay Conference, Spokane, WA, October 2019.

awareness and enable or change system settings during fire weather. With much of the power system in remote locations, lack of communication capabilities in remote locations can delay the rollout of new or advanced technology. Cybersecurity concerns may also create delays that limit the scope timing of technology available for use within the power system.

Grid Hardening

Grid Hardening projects, including targeted undergrounding and overhead covered conductor, can minimize the potential of wildfire ignitions; however, they are costly and take a long period of time to implement even when targeted to high fire risk areas.

Situational Awareness

Advanced risk modeling capabilities are foundational to identifying both the long-term high-fire risk areas in an electric company's service area and the short-term fire risk that might be present due to seasonal conditions. This capability may be



enabled through data science and meteorology skillsets, which are skillsets that traditionally might not have been a part of a utility's resource pool. Smaller utilities may struggle to obtain the level of data required through external services and apply the information to their specific geography and electrical assets.

Weather Stations

Electric utility-owned weather station networks complement publicly available weather information for determining the micro-climate conditions that might be present in small geographical areas that are impactful to the electrical system. The implementation of a weather station network is a large investment involving physical stations being installed and maintained, annual communication data plans, and consumption of weather monitoring data into a risk modeling software to operationalize the results. Utilities in some states have partnered with universities, private weather companies, and other institutions that require weather information to build a robust weather-monitoring network that benefits all entities.

Emergency Backup Power

A critical component of wildfire mitigation involves coordination with communities to identify critical infrastructure and vulnerable populations, and identification of associated technology needs. Surprisingly, critical infrastructure, including many water districts and sewer lift stations, do not have emergency power generation back up. In the case of many sewer lift stations, if those facilities could not be operated during a power outage, they may only have about 24 hours until a biohazard event occurred.

Electric companies play a role in this coordination through communication with emergency management, local governments, customers and communities regarding what de-energization or public safety power shutoff would look like in that area. Coordination between communities, emergency management, and electric utilities to identify the critical infrastructure (water systems, communication, emergency services) that would benefit from some type of backup power supply during extended outages.

Electricity Subsector Coordinating Council's Wildfire Working Group

The electric utility industry, through the Electricity Subsector Coordinating Council's Wildfire Working Group, partners with the United States Department of Energy (DOE) on key wildfire mitigation technologies and for increased funding and pilot testing. Specifically, DOE is utilizing artificial intelligence to identify grid vulnerabilities and prevent disruptions, deploying high-fidelity sensors on the energy grid to detect early fire risk, equipping autonomous drones with machine vision and machine learning capabilities to inspect vegetation and assess wildfire damage, and leveraging advanced aerial autonomous vehicles technologies with real-time sensors to inspect transmission lines and vegetation.

EI Engagement

EI, the investor owned electric utility industry group, holds an annual Wildfire Technology Summit which brings together EI members with representatives from the Department of Energy (DOE), including the national labs, academics, and the private sector to explore near-term (e.g., production or late-stage development) technology solutions that enable the prevention, detection, and mitigation of wildfire risks, to better understand the technological landscape and to identify opportunities for collaboration between the electric industry, private sector research and development partners, and DOE's national laboratories.

Agency Actions:

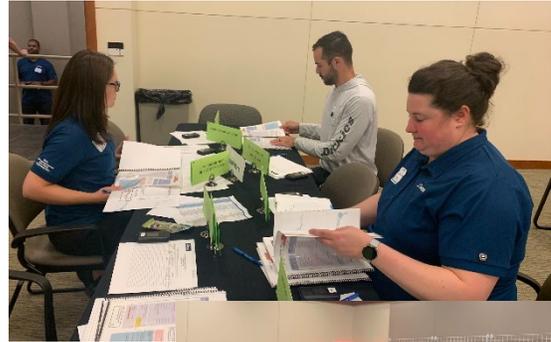
Are there simple actions that federal and state agencies can take without changing the law to better prepare for emergency response to wildfire?

RECOMMENDATIONS:

The Utility Workgroup recommends:

- 1. Continued collaboration between electric utilities and federal, state, and local agencies to prevent wildfire and prepare for emergency response when wildfires do occur;*
- 2. Focused efforts to build an Idaho-based fire detection camera interoperability program;*
- 3. Encourage Federal and State agencies to prioritize permitting and implementing fuel reduction projects adjacent to utility infrastructure and the use of drones beyond line of sight; and*
- 4. Broad, public involvement and engagement with state, local, and Tribal governments; private property owners; the timber, agriculture, building and insurance industries; and many others to:*
 - a. Educate Idahoans about the risk of wildfire and importance of wildfire mitigation and prevention.*
 - b. Provide financial assistance and incentives for risk assessment, wildfire mitigation activities, firefighting resources, and land use planning and land management practices; and*
 - c. Encourage local jurisdictions to enact standards and requirements for building construction in Wildland Urban Interface areas addressing building construction and materials, the type and location of vegetation permitted, defensible space, removal of fuels and deadwood, emergency vehicle access, water supply, and wildfire safety and/or mitigation plans.*

Electric companies participate in and contribute to wildfire readiness programs, such as state-funded fuel reduction programs. Utilities and governmental agencies can collaborate to prepare for emergency response to wildfire with the following actions, some of which are already underway in Idaho:



- *Expedited Response Agreements.* Under these agreements, electric utilities and fire agencies cooperate to proactively prevent wildfires – electric utilities notify fire agencies when a fault is detected on the electric transmission system, and the fire agency dispatches a field response to the location of the fault. Idaho electric utilities have already entered into expedited response agreements, organized by dispatch zones, with Idaho Department of Lands, the Idaho Panhandle National Forest, and the Clearwater National Forest. More opportunities for expedited response agreements exist between utilities and Idaho Timber Protection Associations, Rangeland Fire Protection Associations, and local fire districts.
- *State and Federal Cross-Boundary Fuel Reduction Projects.* The State of Idaho’s Shared Stewardship Initiative and the National Cohesive Wildland Fire Management Strategy provide a foundation for working across ownership boundaries to address wildfire risk. These initiatives are only successful when funding for these programs is prioritized and maintained in perpetuity.
- *Idaho Mutual Aid Group (IMAG).* The Idaho Mutual Assistance Group is a voluntary partnership of all of Idaho’s investor-owned and consumer-owned utilities formed to help restore power when disaster strikes one or more of its members. IMAG members also share best practices regarding wildfire mitigation and are in direct communication and collaboration with the Idaho Office of Emergency Management.
- *Wildfire detection camera interoperability committee.* Many utilities and fire agencies throughout the West are undertaking steps to reduce the risk of wildfire by installing cameras with artificial intelligence functionality to quickly detect the start of a wildfire and notify first responders. Idaho Power has been working with the Idaho Department of Lands (IDL), and the Bureau of Land Management in an effort to coordinate build-out plans for an Idaho-based camera network; the Idaho electric utilities encourage the State to evaluate the benefits that cameras hold for reducing wildfire risk and prioritize funding to IDL to continue camera deployments. The Idaho electric

companies also encourage focused efforts to build an Idaho-based interoperability program. Through a coordinated, state-led effort, Idaho would have a platform for fire agencies to gain access to the valuable information being captured by the cameras to reduce response time and decrease fire intensity.

- *Collaborative Tabletop Exercises.* To prepare for emergencies, electric companies regularly conduct tabletop scenario-based learning with internal and external stakeholders. In these tabletops, participants discuss how to handle a potential emergency, identify gaps, and build partnerships. These opportunities also help electric companies and external stakeholders (such as emergency management, counties, and IDL) to share expertise and familiarize themselves with the challenges they each face in wildfire scenarios. Land management agencies must grant electric utilities timely access to rights-of-way and permit to complete maintenance and improvement needs, and manage vegetation that presents wildfire risk – consistent rules and processes across agencies are imperative. Additional actions that federal and state agencies can take to better prepare for emergency respond to wildfire include: collaboration with utilities to understand critical transmission corridors and how they might be better protected through fuel reduction programs; expanded widths for utility vegetation management activities in transmission rights-of-way permitted on state and federal lands; and more efficient permitting processes for right-of-way maintenance and grid hardening targeted at reducing wildfire risk. The State of Idaho can also play a role in being an advocate for the state’s electric utilities with federal land management agencies.
- *Fuel Reduction Prioritization and Implementation.* Fuel conditions and forest health adjacent to utility rights-of-way can pose significant risk to utility infrastructure and wildfire spread. Utilities currently experience delays in approval from land management agencies, which impairs a utility’s ability to mitigate fires through fuel reduction and other vegetation management practices. Federal and State agencies should use all mechanisms possible to prioritize and implement fuel reduction projects adjacent to utility infrastructure, including streamlined National Environmental Policy Act (NEPA) and other permitting processes.
- *Unmanned Aerial System Inspections.* Unmanned Aerial Systems, referred to as UAS or drones, are used by electric utilities to inspect overhead power lines and utility infrastructure. Drones can decrease inspection time and mitigate potential safety hazards for utility workers by providing detailed imagery and vantage points that may not be easily accessible or seen at ground level. Utilities recognize the value that drones may have in performing detailed inspections and in

conducting safety patrols following an unplanned outage or PSPS. In addition, drone inspections can be more efficient and productive if utilities can inspect beyond visual line of sight (BVLOS). To do so, a BVLOS waiver is required from the Federal Aviation Administration (FAA); utilities have found the process of achieving the waiver to be complex and lengthy. Utilities welcome support and collaboration with the State to simplify and accelerate the process for obtaining a waiver for utilities to perform BVLOS inspections adjacent to utility rights of way.

Community Preparedness

In order to better protect homes and other structures located within the Wildland Urban Interface (WUI), one opportunity is to ensure that all jurisdictions within the state adopt and apply building codes that are focused on fire-wise building materials and landscape practices. These requirements might address building construction and materials, the type and location of vegetation permitted, defensible space, removal of fuels and deadwood, emergency vehicle access, water supply, and wildfire safety and/or mitigation plans. As of 2018, one in every three Idaho homes was situated in the WUI.⁵ As more homes are built in the WUI, there is greater likelihood that homes and communities will be damaged or destroyed by wildfires.

⁵ <https://isb.idaho.gov/blog/understanding-the-wildland-urban-interface-protecting-idahoans-from-wildfires/>

Conclusion

As stated above, we greatly appreciate the Governor's attention to this important issue and the opportunity to participate in this workgroup and provide additional information about the efforts the Idaho electric companies are undertaking to do our part to reduce wildfire risk. In this report, we recommend a variety of policy changes, funding solutions, technology implementation, and state and federal agency action. We believe that your efforts to address the risk of wildfires broadly and proactively through a variety of industries and levels of government will help us work together to address this issue.



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MEMORANDUM

Date: April 19, 2024
To: Governor Brad Little
From: Brad Richy (IOEM), Chris Way (KCFR), and Dustin Miller (IDL) – “Co-Chairs”
CC: Jamie Neill, Workgroup #3 Members

Subject: Wildfire Workgroup #3 Information Sharing

This group was appointed in December 2023, following your Wildfire Roundtable meeting. Your ask of this workgroup was to develop a suite of recommendations for consideration that would allow for better coordination and information sharing between agencies, fire service organizations, various levels of government, private property owners and the public before and during a wildfire incident. You requested there be a thorough review of wildfire policies and best practices in the state of Idaho under four (4) main buckets: policy, funding, technology/collaboration, and agency actions.

Many of these recommendations will require additional resources to implement. For recommendations selected to move forward, we recommend a needs assessment be completed to identify the resources necessary to implement them as actions. Additionally, a few of these recommendations stem from a recent review of the Idaho Fire Management Assistance Grant (FMAG) process, which was a cooperative effort between the Idaho Office of Emergency Management (IOEM), the Idaho Department of Lands (IDL) and a private consulting organization. We believe these recommendations have merit.

The recommendations provided in this report are not prioritized.

With the above in mind, please see our following thoughts and suggestions based upon those (4) four main buckets, as you have requested.

- **Policy:**
 - Improve and streamline “Ready, Set, Go” and standardize a platform for efficient and safe evacuation. Co-brand this document with other agencies.

This workgroup will need additional time to work with the relevant partners on this recommendation.

- Develop additional guidance for local jurisdictions to encourage increased coordination with IOEM Area Field Offices and IDL Agency Administrators. (Recommendation from 2024 FMAG Audit.)
- The State should continue to strengthen collaborative relationships with agencies and entities in support of emergency support function 4 (ESF4). (Recommendation from 2024 FMAG Audit.)
- Improve upon the culture of coordination between agencies with jurisdictional responsibility for fire suppression and government entities who will not be members of unified command. (Recommendation from 2024 FMAG Audit.)
- Establish a cadence and process to bolster and coordinate the evaluation of wildfires that may be candidates for disaster support mechanisms.
- Further utilize the FMAG process to recoup wildfire associated costs for the State of Idaho.

- **Funding:**

- Pursue funding to expand the IDL remote fire detection camera program, only after evaluating the coverage gaps based on locations of IDL and other entities' cameras.
- Given a growing population and human caused fires on the increase, expand capacity and/or funding for statewide prevention and wildfire readiness messaging: i.e. Smokey Bear license plate revenue, state appropriation, federal funding, and partnerships with existing entities.

- **Technology/Collaboration:**

- The State of Idaho should consider creating an interoperability committee with the intention of coordinating wildland fire detection cameras across the state. This recommendation is supported by Wildfire Workgroup #1 and may also appear in Workgroup #2 recommendations.
- Expand the capability and access to a new interagency Idaho fire information webpage: create www.firewatch.idaho.gov / Idaho Fire Watch, and brand as a one-stop place for fire-related information in Idaho. Idaho Fire Watch could likely interact with fire detection cameras as well.

- **Agency Actions:**

- Continue to share information and advocate for the maintenance or appropriate scale up of the Good Neighbor Authority (GNA) at the state and county level to address fire risk on federal lands and improve watershed conditions adjacent to communities.

- Increase the visibility and marketing of the Shared Stewardship Initiative and other relevant programs to ensure the public and interested forest landowners are aware of forest health and fuel reduction funding through IDL.
- Advocate for the support and expansion of Rangeland Fire Protection Associations (RFPAs). Ensure access to contact and location information about RFPAs is readily available to all entities.
- Through collaboration with other wildland fire organizations, establish an agency fire suppression target of catching 95% of fires at 10 acres or less. (Current target is 94%; this action is in line with early detection, aggressive, safe and robust Initial Attack as well as an increased collaboration with Fire Departments.)

In closing, we would like to thank you for the opportunity to express our thoughts and suggestions denoted here and look forward to working with you on their potential implementation.

Respectfully submitted by:



Dustin T. Miller
on behalf of Workgroup #3 Co-Chairs

Memorandum

DATE: April 19, 2024
TO: Governor Little
FROM: Co-Chairs Director Brad Richy and Chief Mark Niemeyer
CC: Jamie Neill
RE: Emergency Response Wildfire Workgroup Report and Recommendations

The Emergency Response Wildfire Workgroup is pleased to present this report and recommendations memorandum. Your leadership in convening the Wildfire Roundtable initiated a collaborative effort to ensure Idaho is best positioned to face the wildland fire threat.

The group has strived to recognize future challenges Idaho will encounter, identify best practices from other western states, and develop achievable recommendations for Idaho's wildfire response community.

As Co-Chairs, we sincerely appreciate the efforts and expertise of the members of the working group. The thorough recommendations contained in this report would not have been possible without their hard work.

Per your request, we've organized the workgroup's recommendations in to the following categories; policy, funding, technology, and agency actions. Some recommendations, by their nature of being comprehensive, involve more than one of these categories. Recognizing that effective emergency response requires efforts before the fire, during the fire and after the fire, we've also categorized the recommendations as follows: pre-event, event response, and post-event. A summary of recommendations is available on the following page.

In closing, we would like to thank you for your leadership and the opportunity to work with stakeholders in providing proactive recommendations related to wildfire emergency response. Our workgroup stands ready to provide clarification, answer questions and continue the work towards potential implementation.

Respectfully submitted by:



IOEM Director Brad Richy, Co-Chair



Boise Fire Chief Mark Niemeyer, Co-Chair

Recommendation	Category	Section
Multi-jurisdictional Idaho Mutual Aid response plan/System	Agency Action Policy Funding	Pre-Event
Statewide notification and evacuation plan	Agency Action Funding	Pre-Event
Statewide risk assessment and reduction program	Agency Action Policy	Pre-Event
Idaho multi-agency fire coordination center	Agency Action Policy	Pre-Event
Incident Management Team/Incident Management Assistance Team	Agency Action Funding	Pre-Event
Best practices for building practices in wildland-urban interface	Agency Action	Pre-Event
Wildfire response reimbursement fund	Funding	Event Response
Wildfire apparatus grant program	Funding Agency Action	Event Response
Improved access to aviation assets	Funding	Event Response
Coordinated community recovery	Agency Action	Post-Event
After action report for state declared fire incidents	Agency Action	Post-Event
Technology task force	Agency Action	Technology
Adequate broadband access and satellite imagery	Funding	Technology
Mutual aid response plan and technology	Agency Action Policy Funding	Technology

Pre-Event Recommendations

Recommendation 1: The State of Idaho should develop a multi-jurisdictional Idaho Mutual Aid response plan/System (IMAS) to ensure initial response to Idaho wildfires utilize Idaho response agencies. This mutual aid plan would focus on Idaho Department of Lands, local Idaho fire departments, Rangeland Fire Protection Associations, and the Idaho Office of Emergency Management. This would include a clear understanding of State of Idaho disaster declaration process in order to activate the mutual aid response plan. Federal land management agencies may also be a party to the agreement.

Issue Examined

Prioritization of use of Idaho assets would deploy resources closest to incidents and incentivize participation in the system. Idaho departments are familiar with Idaho processes and expectations, and would integrate well within Idaho's response community.

Research and Analysis

The Wildland Fire Mitigation and Management Commission (WFMMC) Report states; "Coordination systems and practices that facilitate interagency coordination, including legal agreements, systems for ordering and tracking resources, and training standards, have long been in place in both the structural and wildland fire services, but as the complexity of the problem grows, greater integration of those responders, as well as other emergency managers and partners, is needed."

Potential Outcomes

Intended outcomes would be faster response times, greater response capability and an increase of participation of Idaho agencies for incident responses.

Implementation Category Discussion

Implementation would likely include policy changes to provide authority for mutual aid plan and system, agency actions within various agencies to establish the agreement, and funding for staff to administer the drafting and implementation of the agreement. If appropriate, funding from the Idaho Disaster Emergency Account may provide the structure for allocation of costs associated with this recommendation.

Recommendation 2: The State of Idaho should develop and adopt a Statewide notification and evacuation plan. Notification tool should be mobile, capable to receive notifications and to ensure Idahoans, in areas with cellular coverage and in areas without, have access to notifications. Evacuation plan should be developed and housed at each county's emergency management office, and should address supporting individuals with access and functional needs.

Issue Examined

Rapid notification of citizens in fire situations allows individuals to understand risks and take necessary action. Pre-planned evacuation processes will increase the likelihood of well-

organized operations, when they become necessary. Local jurisdictions may need assistance developing capacity, and statewide processes can be put in place to support emergency communications.

Research and Analysis

“Recent fires that quickly moved into and through communities, such as the 2023 fires in Hawai’i, the 2021 Marshall Fire in Colorado, and the 2018 Camp Fire in California have highlighted the critical importance of evacuation, evacuation planning, and evacuation communication (WFMMC Report, page 103).”

Potential Outcomes

The outcome of implementing this recommendation is an increased level of preparedness related to local evacuation planning and statewide emergency alerting.

Implementation Category Discussion

Implementation of this recommendation would likely require agency action at IOEM and county emergency management offices to develop evacuation plans. Funding may also be required for acquisition of a statewide emergency alerting platform and for staffing or contract work to develop evacuation planning templates and guides.

Recommendation 3: The State of Idaho should develop statewide risk assessment and reduction program and focus available grant funding to projects within the highest risk areas. The focus of this effort should also include post-fire landscape restoration to prevent flooding and landslide issues. A state level Burned Area Emergency Response (BAER) Team should be established to coordinate post-fire restoration. This program should geospatially identify hazard areas, identify mitigation actions that can be taken to reduce risk, and convene a multi-discipline stakeholder group to align programs across jurisdictions and to evaluate the return on investments.

Issue Examined

Current risk assessment and reduction programs can occur in silo efforts between federal, state and local jurisdictions. Funding programs may see greater return on investment when all involved stakeholders are working toward effective and widespread risk reduction and mitigation.

Research and Analysis

The WFMMC Report speaks to the importance of mitigation; “Actions to effectively address increasing wildfire risks must be holistic and consider complementary approaches to both wildlands (the natural environment) and communities (the built environment).”

Potential Outcomes

Outcomes related to this recommendation are a reduction in fire threats adjacent to and in communities in the wildland urban interface.

Implementation Category Discussion

Implementation of this recommendation would likely require agency action to provide staff and expertise to the coordinated effort. Some policy considerations such as an executive order establishing the group may be worth considering.

Recommendation 4: The State of Idaho should develop and implement the Idaho Multi Agency Coordination center (IMAC) to ensure cross-jurisdictional planning, response, and recovery efforts State-wide. IMAC to be housed at the Idaho Response Center under the direction of the IOEM Director

Issue Examined

Fire planning, response and recovery is an inherently inter-agency operation. A center staffed by representatives of statewide fire operations would increase effective fire season coordination. The WFMMC found that “coordination requires the support and participation of all relevant entities, from the local to the federal, to utilize all resources effectively.”

Research and Analysis

Fire events in Idaho and across western states have highlighted the importance of a ready cadre of subject matter experts to monitor issues, support local and state fire responses, and provide resource and operational support to on-scene operations. The ability to proactively activate and staff this coordination center may require access to the State of Idaho Disaster Emergency Account (DEA) or deficiency warrant funding.

Recent research has recommended applying coordination efforts found in other disciplines. In law enforcement and intelligence, fusion centers serve to facilitate the sharing and analysis of information across different jurisdictions and agencies in order to promote a unified approach. Threats from fire emergencies would benefit from similar approaches. This model could address challenges and meet goals for fire coordination through enhanced information sharing and situational awareness, multidisciplinary collaboration and strategic planning that would improve the outcomes for response and recovery wildfire operations.

Potential Outcomes

Outcomes related to this recommendation would be an increased level of subject matter expertise to be co-located in order to provide maximum fire response efficiencies.

Implementation Category Discussion

Agency action would likely be required for this recommendation to assign individuals to the coordination center. A potential policy consideration may be access to the DEA to fund coordination activities.

Recommendation 5: The State of Idaho should develop and implement Idaho Type 3 Complex Incident Management Teams/Incident Management Assistance Teams to fill a significant Idaho gap in adequate state-wide incident management support. A minimum of 3 regional teams (North, Southwest, East) comprised of state and local team members, reporting to the IMAC.

Issue Examined

The ability to forward deploy trained and experienced staff to local jurisdictions experiencing a complex fire incident will provide critical staffing. Jurisdictions experiencing major events lack resources necessary to manage and support incident response. Type 3 Incident Management Team capability could supplement land management team deployments during initial responses or when there are national resource shortages. In addition, trained individuals may be able to integrate with land management Incident Management Teams to serve as a liaison for response and future recovery operations.

Research and Analysis

Recent analysis has shown there to be gaps in the existence of incident management and assistance teams in Idaho. The WFMMC Report recognized that “increased access to qualifications and training is needed for partners outside of the federal system.”

Potential Outcomes

The outcome of this recommendation would be a rapidly deployable set of resources that could quickly support jurisdictional fire response staffing requirements.

Implementation Category Discussion

Agency action would likely be needed at several levels to provide staff to participate on the teams. Funding for training and staff to coordinate efforts may also be required.

Recommendation 6: The State of Idaho, through the State Fire Marshal, should identify data driven best practices and considerations related to development and building practices in the wildland urban interface.

Issue Examined

These advisory recommendations and considerations could be developed in coordination with property development stakeholders, potentially including construction industry representatives, realtors, building code officials and financial services industry representatives

Research and Analysis

Given local administration of development and building practices, best practices may be presented as advisory for consideration.

Potential Outcomes

Outcomes from this recommendation may result in risk reduction on the community scale.

Implementation Category Discussion

Implementation of this recommendation would likely involve agency action at the State Fire Marshal’s Office to conduct the research.

Event Response Recommendations

Recommendation 7: The State of Idaho should create and implement a Wildfire Response Fund to ensure timely reimbursement for Idaho agencies responding to Idaho wildfire.

Issue Examined

Federal grants and billing occur slowly, which can result in agencies waiting for their costs to be reimbursed. State supported financial recovery via a wildfire response fund can occur more quickly. In addition, a wildfire response fund would support mutual aid deployment of resources to incidents where additional support is required. Idaho fire departments responding out of state for Emergency Management Assistance Compact (EMAC) deployments have had to wait significant periods for their costs to be reimbursed while billing and cost adjudication occurs.

Research and Analysis

In the past, final reconciliation of disaster funding has been delayed as federal land management agencies are unable to quickly provide documentation for claims. Similar delays have occurred when agencies respond out of state. The WFMMC report notes: “Reimbursements from federal agencies can take years to complete, disincentivizing participation in resource sharing by local, state, and Tribal entities that may not be able to hold debt on their books for the months or years required for a reimbursement (page 108).” The WFMMC also noted that “insufficient and delayed reimbursements to Tribal, state, and local governments also deter collaboration in wildfire response and result in the potential underutilization of the total potential pool of resources.”

Potential Outcomes

An outcome of this recommendation would be a reduction in financial impacts to local jurisdictions, and an increase speed in which resources could be deployed to support wildfire operations. State executed and supported cost recovery process could more quickly reimburse costs incurred and owed to response agencies.

Implementation Category Discussion

Implementation of this recommendation would likely require funding to establish the fund to reimburse responding agencies while applicable federal reimbursements are processed.

Recommendation 8: The State of Idaho should establish an Idaho wildfire apparatus grant program, available to local fire departments, to ensure adequate initial attack response to Idaho wildfires. Similar programs have demonstrated success in other western states, and Idaho has noted for the allocation of equipment for hazardous material response. For Idaho, these apparatuses would be owned by IOEM, granted to local fire departments, with a guarantee of response in conjunction with IDL where applicable

Issue Examined

Current surplus programs provide limited apparatus available to Idaho departments. Grant funds generally are unable to provide sufficient acquisition of fire apparatus.

Research and Analysis

“Successful mitigation and management of wildfire requires adequate funding at all levels of government, including federal, state, local, and Tribal governments. In some cases, it is challenging for governments to fund these activities.” (WFMMC recommendation 134)

Potential Outcomes

Outcomes of this recommendation would be an increase of fire apparatus available to departments in Idaho.

Implementation Category Discussion

Implementation of this recommendation would likely require funding for acquisition of equipment as well as agency action for administration of the program.

Recommendation 9: The State of Idaho should improve state-wide access to aviation assets for quicker initial fire attack.

Issue Examined

Rapid initial attack to keep fires small often requires substantial aviation assets to prevent fire growth. Some federal aviation assets have been reallocated away from being dedicated to Idaho, or could be unavailable due to competition for resources across the nation. Idaho could benefit from an increase in statewide inventory and contract-based aircraft.

Research and Analysis

Years with high resource demand have seen land management agencies request activation of Idaho National Guard aviation assets to provide fire suppression missions. This has been due to the lack of aviation resources in traditional fire resource ordering systems, however national security missions may limit this availability in the future. The 2023 Wildland Fire Mitigation and Management Commission’s Aerial Equipment Strategy Report noted: “as wildfire seasons increase in duration and intensity, and as the need for proactive risk reduction treatments increases, there is a compelling need to reexamine existing approaches to aviation fleet procurement, use, composition, and quantity (page 9).”

Potential Outcomes

Outcomes from this recommendation would be statewide availability and access to needed aviation assets.

Implementation Category Discussion

Implementation of this recommendation would likely require funding for contract or procurement of aviation assets.

Post-Event Recommendations

Recommendation 10: The State of Idaho should ensure coordinated and timely recovery for communities affected by wildfire with life-safety needs as the highest priority, followed by rebuilding of damaged infrastructure. Recovery efforts would be led by the IMAC/IOEM. Disaster assistance programs will be coordinated to provide available funding.

Issue Examined

Incident recovery operations are complex due to different agency and jurisdictional responsibilities, as well as different funding streams that may be available given incident impact. Coordinated incident recovery may include short term mass-care operations as well as long-term rebuilding of infrastructure and homes. IOEM is well positioned as the state's emergency management agency to coordinate the effort.

Research and Analysis

Fire events in Idaho have shown that initial recovery operations require the assistance of voluntary agencies, business owners, and agencies. Long term recovery operations are no less complex when infrastructure and homes have been lost. No one agency has all the resources to meet every need, but a coordinated recovery operation will ensure the most available support can be provided. "Communities that have experienced significant wildfires often identify extensive post-fire needs that existing programs and authorities may struggle to meet (WFMMC Report, page 125)."

Potential Outcomes

Outcomes from this recommendation would include the ability for a community affected by a wildfire event to more quickly return to normal.

Implementation Category Discussion

Implementation of this recommendation would involve agency action to implement the Idaho Office of Emergency Management's recovery plan. Some policy considerations may be appropriate to designate state agency representation on the recovery coordination efforts.

Recommendation 11: The State of Idaho should ensure all fires in Idaho receiving a state or federal disaster declaration conduct a comprehensive after-action review to be circulated to local and state agencies (to include associated responders- utilities, etc) who participated in the fire.

Issue Examined

After action reports provide valuable opportunities to learn from incidents in order to find areas of improvement. Lessons learned in one area of the state may have applications in other jurisdictions.

Research and Analysis

After action reports have been shown to be very effective tools to ensure processes are executed in the most efficient way possible, or identify areas where the process may need to be changed.

Potential Outcomes

Outcomes from this recommendation would be a continual cycle of improvement and capacity building for all agencies involved in disaster declarations.

Implementation Category Discussion

Agency action at IOEM and IDL to participate and lead after action review discussions and in drafting after action reports.

Technology Recommendations

Recommendation 12: The State of Idaho should convene a taskforce of technology subject matter experts to develop and present for adoption, a comprehensive state-wide strategy for wildfire technology advancements in Idaho. This group should focus on minimum requirements for the various technologies (cameras, smoke/heat detection, etc.) that can and would be used for effective wildfire mitigation, response, and recovery efforts. Any and all grant funding for the purchase of wildfire technology must meet these standards to ensure open data sharing, continuity with other wildfire technologies, etc.

Issue Examined

A patchwork approach of technological advances is currently occurring in Idaho, with different agencies pursuing strategies to better leverage technology to support fire operations. Technology advancements have the potential to keep fires small and to be able to share GIS and situational awareness information. This recommendation likely compliments recommendations from other Governor wildfire working groups.

Research and Analysis

New technology adoption has not had the opportunity to be coordinated at a level that allows for interoperability between agencies. As this field is rapidly becoming more advanced, opportunities for cross-agency information sharing should be achievable. “Enhancing the use of science, data, and technology in the context of wildfire management requires investing in research (both applied and basic) and promoting the development and use of technology (WFMMC Report page 192).

Potential Outcomes

Outcomes of this recommendation include seamless sharing and access of incident data, to more effectively understand situations and better understand actions that may need to be taken.

Implementation Category Discussion

Agency action would be required for this action, through participation and representation in the task force. Some policy considerations may be necessary, such as executive direction to establish a task force.

Recommendation 13: The State of Idaho should ensure adequate broadband and/or satellite capability to every fire in Idaho to ensure the safety and effectiveness of firefighting operations. In addition, Idaho should establish a process with the National Weather Service (NWS) for positioning satellite coverage on Idaho to receive real-time imagery.

Issue Examined

Wired and wireless access becomes very limited in areas prone to wildfire. Effective incident response requires rapid access to data and information. Current fire agency inventory of mobile data and communication assets are limited. Contracted or federal communications assets may not be available to Idaho due to incidents elsewhere in the nation. Increasing state and local

jurisdiction capacity for mobile communications capability would ensure Idaho has the necessary equipment, staffing and processes to communicate and share data during fast moving incidents.

Responses in other states have demonstrated the value of having the NWS re-position satellites to focus on major fire activity, and providing that imagery to the state emergency management agency. NWS appears willing to support this activity.

Research and Analysis

Recent events have occurred where incident command posts are located in remote areas or in areas with communications limitations. Federal incident management teams have experienced limitations and have asked Idaho agencies to provide communication assets during incidents.

Potential Outcomes

Outcomes from this recommendation include the ability to send/receive data from incident locations using equipment, staff and processes provided by state and local agencies.

Implementation Category Discussion

Implementation of acquisition of NWS satellite imagery would only require agency action between IOEM and NWS. Implementation of enhanced mobile broadband capability may require funding to develop deployable communication capabilities.

Recommendation 14: The State of Idaho should utilize a Mutual Aid Response technology tool to ensure a rapid initial attack response to all wildfires in Idaho.

Issue Examined

A rapidly accessible mutual aid technology tool would support the quick deployment of resources assigned to fire response.

Research and Analysis

Currently the Idaho Fire Chiefs Association Resource Response Plan provides a short term, unfunded method for rapid initial attack needing structure protection assets. This plan lacks a technology tool to support identification of resources or rapid deployment.

Potential Outcomes

Outcomes from this recommendation would be the ability to quickly identify, allocate and track resources to areas in greatest need.

Implementation Category Discussion

Implementation of this recommendation would require funding for the procurement of a mutual aid technology platform.

Conclusion

These recommendations demonstrate that the workgroup expects an expansion of wildfire threats and impacts to Idaho communities. It also contains a series of actions that can directly improve Idaho's abilities and capabilities for addressing this threat. These recommendations, should they be implemented, would require changes in the way Idaho conducts fire preparation, response and recovery. As the wildland fire threat increases, so must systems and processes evolve with the threat. The potential implementation of these recommendations can assist Idaho in finding solutions that recognize Idaho's unique landscape and that appropriately delegates responsibilities to agencies based on jurisdictional responsibility and authority.

References

ON FIRE: The Report of the Wildland Fire Mitigation and Management Commission (2023), <https://www.usda.gov/sites/default/files/documents/wfmmc-final-report-09-2023.pdf>

Aerial Equipment Strategy Report, Wildland Fire Mitigation and Management Commission (2023), <https://www.usda.gov/sites/default/files/documents/wildfire-commission-aviation-report.pdf>