

**CONGRESS SHOULD INVESTIGATE THE FOREST SERVICE'S WASTEFUL PRACTICE OF BUILDING EXPENSIVE FIRELINES WHERE THEY CANNOT BENEFIT COMMUNITIES AND WHERE THEIR CONSTRUCTION DAMAGES ENVIRONMENTAL AND CULTURAL RESOURCES**

**1. Firelines damage cultural features, create serious environmental impacts, and impair natural ecosystems on public lands.**

**1(a). Firelines irreparably damage roadless and wilderness values by disrupting natural ecosystems and leaving permanent scars in wildland habitats.** In recent years, the Forest Service has greatly increased wildland and wilderness dozerline\* construction that is destructive to public lands. In addition to cutting trees for the dozerlines themselves, backcountry dozerline construction clears vegetation down to bare soil for vehicle access and helicopter landing sites. Parking vehicles and equipment further compacts barren ground, and compacted soil can aggregate with other environmental stressors that cumulatively impair whether and how well native vegetation recovers.

**1(b). Firelines damage sensitive areas.** In recent years, the Forest Service has increasingly constructed dozerlines in designated Wilderness, Inventoried Roadless Areas, Botanical Areas, Research Natural Areas, Wilderness Study Areas, Riparian Reserves, proposed wilderness areas, old growth forests, wetlands, and other sensitive habitats.

**1(c). Firelines leave lasting environmental legacies.** Old firelines become ghost roads, and facilitate additional soil erosion, compaction and disturbance, making lands more susceptible to non-native or noxious weed spread and chronic stream-sedimentation impacts. Non-native vegetation can be more fire prone than existing native vegetation. Increased access through illegal off-highway-vehicle use compounds these impacts and increases the harassment of wildlife and illegal poaching. Additionally, access on old dozerlines creates more opportunity for human ignitions in otherwise remote landscapes.

**1(d). Firelines desecrate cultural history and archeological sites.** For example, the Forest Service authorized bulldozing that injured numerous Native American archeological sites during the 2018 Klamathon Fire in the Soda Mountain Wilderness and Cascade-Siskiyou National Monument. Additional impacts to Native American archeological sites occurred in the 2021 Monument Fire and the 2021 McFarlane Fire on the Shasta-Trinity National Forest.

**1(e). Firelines harm recreational resources.** The Forest Service bulldozes firelines over trails, damaging the integrity and scenic qualities of Forest System Trails, National Recreation Trails, National Scenic Trails (including the Pacific Crest Trail), and other important recreational resources. Such damage often costs the taxpayer. *See 3(b) below.*

**2. Ineffective backcountry firelines cannot replace effective home hardening or firelines close to communities**

**2(a). The most scientifically supported strategy for protecting homes against wildfire is home hardening.** Home hardening means reducing home ignitability and minimizing ignitable features within the 130-foot radius of the house. Highly ignitable structures can be lost in even low-severity wildfires.<sup>4</sup>

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\* A “dozerline” is the result of using bulldozers to blade the ground down to bare soil. While dozerlines are generally linear, “dozerlines” in this factsheet include large polygonal areas cleared by bulldozers.

**2(b). The Forest Service regularly authorizes the construction of extensive dozerlines that are operationally ineffective and do not contribute to fire containment.** This includes building remote backcountry firelines despite a low probability of success and building firelines that cannot be safely held by fire suppression crews.<sup>5</sup> This extensive construction often includes multiple contingency firelines built many miles from the fire perimeter and sometimes also far from homes or communities. As relatively narrow linear features, fires often burn over dozerlines during extreme fire behavior.<sup>6</sup>

### **3. The Forest Service’s current practice of fireline construction wastes taxpayer money.**

**3(a). Building unnecessary and ineffective firelines is costly.** For example, during the 2021 Dixie Fire in Northern California, the fire burned over approximately 600 miles of dozerlines.<sup>7</sup> Regardless, the Forest Service is increasing the scope and scale of dozerline construction, often building ineffective contingency lines, with sometimes a hundred miles or more of contingency lines built on a single large wildfire event.

**3(b). Rehabilitating all firelines—including unnecessary and ineffective ones—is also costly.** Rehabilitation costs include restoring, repairing, or reversing the damage highlighted in section one of this fact sheet. Rehabilitation includes recontouring and restoring dozerlines in wilderness as well as restoring trails where the Forest Service has bulldozed a fireline over existing trail. Restoring trails has occurred in the Soda Mountain Wilderness following the 2018 Klamathon Fire, the Siskiyou Wilderness after the 2018 Natchez Fire, the Bucks Lake Wilderness after the 2021 Dixie Fire and in numerous locations and on numerous fires along the Pacific Crest Trail. The cost of trail restoration could be avoided by utilizing less damaging fireline construction techniques.

**3(c). Firelines create ongoing expenses after rehabilitation.** Long-term impacts such as noxious weed control and downstream sedimentation require immediate and long-term mitigation efforts, and such activities must be publicly funded.

**3(d). Despite the costs to construct, to rehabilitate, and to mitigate, the Forest Service will allow fireline construction even when the fireline construction becomes obsolete.** During the Trail Creek Fire in Montana, for example, the Forest Service allowed private contractors to complete a fireline miles upwind from the fire perimeter, even after the wildfire was no longer a threat to the area.<sup>8</sup>

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<sup>1</sup> Friends of the Bitterroot, P.O. Box 442, Hamilton, Montana 59840, news@friendsofthebitterroot.net, <https://www.friendsofthebitterroot.net/>

<sup>2</sup> Friends of the Clearwater, P.O. Box 9241, Moscow, Idaho 83843, katie@friendsoftheclearwater.org, <https://www.friendsoftheclearwater.org/>

<sup>3</sup> Klamath Forest Alliance, P.O. Box 1155, Jacksonville, Oregon 97530, siskiyoucrest@gmail.com, <https://www.klamathforestalliance.org>.

<sup>4</sup> Cohen, J.D. 2000. Preventing Disaster: Home Ignitability in the Wildland-Urban Interface, Journal of Forestry, pp. 15-21.

<sup>5</sup> Firefighters United for Safety, Ethics and Ecology 2019. *We Had To Do Something: Futility and Fatality in Fighting the 2018 Mendocino Complex Fire*.

<sup>6</sup> 2018 Carr Fire CATlines - Dramatic Drone Imagery, available at <https://www.youtube.com/watch?v=CmVFBJCAO7Q&t=5s>.

<sup>7</sup> Lunder, Zeke. 2021. The Lookout Blog. Dixie Fire – 8/29/21. Ongoing updates. <https://the-lookout.org/2021/08/29/dixie-fire-updates/>; Lunder, Zeke. 2021. The Lookout Blog. Dixie Fire – 9/3/21. <https://the-lookout.org/2021/09/03/dixie-fire-9-3-2021/>.

<sup>8</sup> [Sequence of satellite pictures of the Trail Creek Fire activity from beginning to end.pdf](#).