Data Submitted (UTC 11): 1/13/2024 5:00:00 AM First name: Michael Last name: Rains Organization: National Wildfire Institute Title: Comments: The National Wildfire Institute urges the Biden Administration, and specifically the USDS Forest Service, to:

1. Please know that we are faced with a National Emergency. That is, horrific damages to property and lives lost due to catastrophic unplanned wildfires.

2. Fully under that forest maintenance, especially on the National Forests, needs to be enhanced. This is the primary cause of the destructive wildfires. Our forestlands are clogged up with vegetation. Hazardous fuel buildups must be removed. Sometimes we take the power of healthy forests for granted. In addition to their role in helping reduce the intensity of

wildfires, healthy forests reduce the impacts of a changing climate by offsetting as much as 20 percent of the country's annual greenhouse gas emissions. The cost for expanded forest maintenance on public lands is \$3.72 billion per year for 5-7 years [including a 3.18 percent inflation adjustment] to show real change in forestland resiliency.

3. Unplanned wildfires must be put out as quickly as possible. The concept of "backing off to the next best ridge" or "managed fire" or "beneficial fire" or "let it burn" must be stopped. For now, prescribed fire is the only truly planned fire that can be carefully managed. Perhaps it is now time for a new, contemporary "10 AM" Policy. See page 166 of

A Call to Action (rev. 17.4).

And, we urge the Biden Administration and the Department of Agriculture and the Forest Service to please become more aware of the specifics in A Call to Action and the new proposed Amendment by the United States Department of Agriculture regarding old-growth forests:

4. Be more aware of the foundational document known as A Call to Action. This document, started almost three years ago, now has 72 contributors that are professionals advancing landscape scale conservation. Several outside the current contributors have concluded that it is one of the most comprehensive documents about forests and fire that is

available today.

5. The proposed National Forest Plan Amendment designed to conserve old-growth forests. We believe this proposed amendment is extremely short-sighted. America's forests are already clogged up. The futility of trying to save or emphasize late successional and old-growth forests is only going to succeed if [a] the adverse effects of unplanned wildfires are minimized through expanded forest maintenance and [b] knowing the way to accomplish this

requires implementation of A Call to Action - including the declaration of a national emergency.

Review again, proposition No. 2, above. We believe the basic principles of A Call to Action should be part of any proposed legislation, including a more contemporary Organic Act, addressing unplanned wildfires and forest maintenance. We can help.

We strongly recommend Congress hold Hearings on this critical subject. The National Wildfire Institute can assist.