



- Industrial Fire Precaution and Activity Levels



Background



- NFDRS proposed changes began in 2014
 - Mostly fully implemented 2022 for all other fire danger products
 - Full shutdown of all legacy 78/88 on Jan 31, 2023
- Fuel models, and fuel moisture models changed for V4 NFDRS
 - Indices are the same ERC, IC, SC, BI but numbers do not match
 - New models are hotter than the old
 - More reactive to changes in the weather



Background



- Work on IFPAL began in earnest in 2020.
 - USFS recognized IFPL and PALs involuntarily dismantled
 - USFS R6, R5, ODF, DNR – opportunity to improve system due to forced change
 - Made sense to have single system – Brought BLM in late 2021.



Proposed changes from IFPL to IFPAL



IFPL zones to most representative station

IFPAL Restrictions

Level 1 - no significant changes, 1 hour watch, specifies list of activities

Level 2 – Reduced shutdown time to noon-7pm, specifies equipment times, only restricts mowing mastication welding cutting of metal, but provides RH threshold to automatically waive restrictions

Level 3 – Major changes

Level 4 – not a total shutdown. Allows loading and hauling, equipment servicing, road maintenance

Also specifies application to strictly industrial activities. Pushes things like personal saw use to public use restrictions



Opt-out vs stay involved



- ODF is not currently looking to implement the new restrictions but watching
 - Creating issue of 2 standards in OR and how westside OR BLM will be managed
- USFS planning to move forward with 2024 season implementation
- Opt out – maintain current IFPL restriction levels
 - Indices will over restrict and have to continually be reduced manually
 - Introduce significant subjectivity to restrictions – Trying to reduce subjectivity
 - Varying restrictions as contractors move across land management boundaries and issues with good neighbor authority contracts.
 - May eventually have to change thresholds and create own tracking system to make PV values less subjective
 - Our current IFPL restriction map may need heavy modification to cut out federal lands.
- Stay in – Rule making and public outreach
 - Re-education of both sides of the regulations
 - Within Washington, single restriction system, and single USFS system across west coast
 - High confidence in the system outputs. Switching to representative RAWs can also increase accuracy



How do we get there (moving to IFPAL)



- Rule Making process:
 - CR101 (notification of potential rule change) already drafted and quick to implement
 - CR102 (proposed rule language) requires public comment period
 - CR103 (final rule language) Realistically, 9 months to get done CR101-CR103
- Stakeholder meetings (internally partially vetted)
 - Forest Practices personnel
 - Sales and leasing
 - Washington Farm/Forest Assn
 - WFPA
- USFS leading push to brief US congressional staffers, also may push to State level staffers as well
- Develop more robust public use restrictions to cover personal saw use
- To implement by April 15, 2024 we need a decision to stay or opt out by No later than July 1, 2023.