

**Meeting Date: January 28, 2025**  
**Agenda Item No. 17**  
**Batch No. 03**

**From:** [Laura Maloney](#)  
**To:** [FGG, Public Comment](#)  
**Subject:** [External] Public Comment on Wildfire Preparedness and Battery Energy Storage Systems (BESS)  
**Date:** Monday, January 27, 2025 6:38:13 PM

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Thank you, Supervisor Jim Desmond, for highlighting the urgent need for San Diego County to strengthen its wildfire risk reduction efforts. I fully support agenda items 16, 17, and 18, as wildfire preparedness must remain a top priority for our county.

However, I urge you to include an additional critical measure in the plan: prohibiting the construction of Battery Energy Storage System (BESS) facilities in California.

The risk these facilities pose is undeniable. Too many BESS facilities have caught fire, endangering public safety and our environment, all for the benefit of corporate profits. The recent fire at the Moss Landing facility is a stark example of the catastrophic consequences that can occur, and we cannot afford to let such disasters happen again.

I strongly oppose the establishment of any BESS facilities, as they have proven to be unsafe. At the very least, they must never be sited in areas designated as having the highest wildfire risk. Despite assurances from companies, the reality is clear: these facilities are prone to fires that release toxic chemicals into our environment, putting our communities and first responders in grave danger.

San Diego County has a responsibility to protect its citizens. Please take further action to *prohibit* BESS facilities as part of your wildfire preparedness strategy and strengthen our defenses against fire risks.

Thank you for your attention to this critical matter.

Sincerely,  
Laura Maloney

From: William E. Simpson II  
To: FSG, Public Comment; Desmond, Jim; McDonald, Hunter; Anderson, Joel; District 3 Grants; FSG, District 4 Grants; District 1 Grants; Montgomery/Steppe, Monica  
Cc: shea.mccarron@gmail.com; Kathleen Hayden; chamise\_plink@icloud.com; captainlenhorgan@yahoo.com; Sandiego; CAP; Kelly, Meghan; LUEG, PDS.PlanningCommission; Kathleen Hayden  
Subject: [External] Re: Jan. 28th 2025 905 Meeting - Agenda Item 17 - Grass & Brush Fuels Management  
Dates: Tuesday, January 26, 2025 2:13:11 PM  
Attachments: Screenshot 2025-01-19 at 1.16.14 PM.png  
Screenshot 2025-01-25 at 12.38.27 PM.png  
Screenshot 2025-01-25 at 12.42.28 PM.png  
Screenshot 2025-01-23 at 7.35.37 PM.png  
Screenshot 2025-01-17 at 2.22.22 PM.png  
Screenshot 2025-12-01 at 6.53.23 PM ooo.png  
Screenshot 2024-11-20 at 9.59.54 PM.png  
Screenshot 2024-12-03 at 1.40.33 PM.png  
Screenshot 2024-12-03 at 1.03.56 PM.png

I waited for 5-hours to give a comment that I drafted **for the 2-minutes** that is minimally reasonable for any constructive comment, let alone one on such a complex issue. Then I find out I had 56 seconds.

That is really disrespectful for the time a professional such as myself has put into offering the County a bona-fide proven solution for wildfire fuels management. Today, I wasted valuable time.

Capt. William E. Simpson II - USMM Ret.  
**Founder - Exec. Director - Wild Horse Fire Brigade**  
Ethologist - Author - Conservationist  
**Wild Horse Ranch**  
P.O. Box 202 - Yreka, CA 96097  
Phone: 858-212-5762  
[Wild Horse Fire Brigade \(https://www.wildhorsefirebrigade.org/\)](https://www.wildhorsefirebrigade.org/)

On Monday, January 27, 2025 at 12:21:55 PM PST, William E. Simpson II <gemmaster7@aol.com> wrote:

**TO: San Diego County Board of Supervisors**

RE: A Proven Cash-Positive Grass & Brush Wildfire Fuels Management Plan

VIA EMAIL ONLY - OPEN LETTER-COMMENT - **Item 17, Jan. 28th Meeting**

**Greetings Supervisors:**

Let me start by saying that the insurance industry analysts at **AM BEST** (since 1898) were so impressed with my experience and Proven, Nature-based, cost effective wildfire fuels management plan, that they financed a documentary about the Plan: HERE is the Link:

<https://www.ambest.com/video/video.aspx?s=1&rc=wildhorses323>

In July of 2018, a wind-driven grass and brush fueled wildfire broke out on the I-5 Freeway corridor in the town of Henley-Hornbrook. That deadly wildfire (Klamathon Fire) raced over the privately-owned, state and federally owned landscape that was choked with grass and brush (*where our cultural-heritage horses did not graze*), and headed towards the old growth forest (Cascade-Siskiyou Monument) and the college town of Ashland Oregon, which was placed on 'standby' for immediate evacuation.

By the time that deadly wind-driven wildfire reached the landscape managed by the cultural-heritage horses, it had already incinerated 38,000-acres of primarily grass and brush. But once it reached the huge fire-breaks grazed-in by the horses, the fire lost its ferocity... less fuel = less heat and less flame. CALFIRE stopped that deadly wildfire in the immediate area where the horses created thousand-acre fire breaks! I know because I was there on the fire-line for 9 long days. Some scientists call that a 'proof'.



William E. Simpson II speaking to investigative film maker, Micah Robin from Colorado College, during primary filming for the documentary '*Fuel, Fire & Wild Horses*' in May 2018, **2-months before** the deadly, 38,000-acre grass and brush fueled *Klamathon Fire*. In the background are the horses managing wildfire fuels, which created several large fire-breaks (including a 3,000 acre fire break at Agate Flat that protected the old-growth forest just 2-miles to the north), which ultimately benefited CALFIRE's suppression efforts in July 2018, two months later. The wind-driven blaze was stopped before it incinerated the college town of Ashland, OR. William Simpson was on the Camp Creek fire-line for 9-days serving as a technical advisor to CALFIRE.



The little family of wild horses seen in the image above stood as guardians of the old growth forest during the deadly Klamathon Fire. They cost-effectively grazed-in large-scale wildfire breaks and maintained them for years that kept the grass and brush fueled wildfire from entering the forest. (Note: this works to keep grass and brush wildfires from entering into urban areas from outside the WUI)



*A family band of wild horses calmly graze wildfire fuels even as the deadly 2018 Klamathon Fire approached. Wild horses have evolved on the North American landscape over millions of years and over that period have been subjected to times of volcanic eruptions and thousands of wildfires. Unlike domestic horses, which usually panic in the face of wildfire, wild horses on the range will calmly graze, even as a wildfire is approaching, instinctively knowing what to do, and when to do it. Photo: William E. Simpson II – July 9, 2018.*

Grass and brush are primary fuels in a vast majority of deadly, costly wildfires, and also serve as the ladder fuels on the ground, delivering fire to other fuels, such as structures and forests.

***This past winter (2024-2025 - ongoing), we've already received a record amount of precipitation, which is currently generating a record amount of flammable vegetative materials, grass & brush.***

Contrary what some people may believe, and according to published science, 66% of ALL wildfires are primarily fueled by grass & brush, not trees or forests. And the vast majority of loss of life and hundreds of \$-Billions in annual costs (property business losses) are from grass and brush fueled wildfires, NOT forest fires. And given the upward trend of loss of life, homes, business and overall costs, we may eclipse \$1-Trillion in wildfire losses in this coming year.

***Thinning forests, will NOT solve the prodigious annual grass and brush problem*** that stems from the collapsed herbivory in California. The ONLY solution is the restoration of the herbivory in a manner that places the most emphasis on cost-effectiveness (ongoing long-term effect) and ecologically-economically sensible implementation.

It's very likely that the collapsed herbivory is the fault of California Dept. of Fish & Wildlife's mismanagement and reckless monetization of our deer and elk populations. They fail to conduct regular and accurate (audited) census of cervids, which is absolutely required for proper management and hunting quotas.

Selling deer and elk hunting tags and thereby increasing the *human predation* upon the cervid populations already in collapse is just ridiculous and demonstrates that hubris and greed have overcome logic and common sense in our government agencies. This MUST end.

**Lets Review What Has Failed For the Past Decades to Reduce Catastrophic Grass and Brush Fires & Why:**

*"Forest fires may get more attention, but a new study reveals that grassland fires are more widespread and destructive across the United States. Almost every year since 1990, the study found, grass and shrub fires burned more land than forest fires did, and they destroyed more homes, too." - NYT*

We needn't look far to see the recent empirical truth of the foregoing statement (*\*denotes grass and brush fueled wildfire*)

**\*2025 Los Angeles Fires:**

AI meta-data report: "According to recent estimates, the Los Angeles wildfires have caused over \$250 billion in damages, with the potential to reach \$275 billion, making it one of the costliest natural disasters in US history; the fires are reported to have damaged or destroyed around 17,027 structures, including homes and businesses, across the affected areas."

**\*McKinney Fire** – The McKinney Fire in Northern California and Southern Oregon in 2022 destroyed at least 118 homes and 185 structures in total. The fire also destroyed the Klamath River Community Hall and a building that housed Karuk tribe archives.

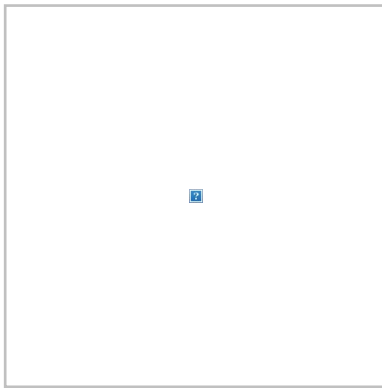
**\*Lahaina Fire** (102 dead, 2,200 structures burned)

**\*Mill Fire** (118 homes destroyed)

**\*Marshall Fire** (1,084 homes burned)

**\*Camp Fire** (85 People died, deadliest in CA History with 18,000 structures burned)

**\*Sonoma Fires** – On the night of October 8, 2017, a historic wind event led to one of the worst firestorms in Sonoma County history, followed by almost three weeks of fire. In total, the Nuns, Tubbs, and Pocket Fires (together comprising the Sonoma Complex Fire) burned over 110,700 acres in Sonoma and Napa counties. 24 lives were lost as a result of the fires. 6,997 structures were destroyed, resulting in direct losses exceeding \$7.8 billion (CA Insurance Commissioner).



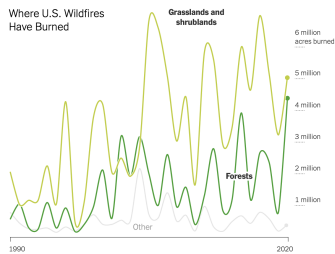
\*Alameda Fire – The Alameda Fire in Oregon destroyed at least 2,357 structures, including over 600 homes, on September 8, 2020. The fire also damaged over 2,500 homes and 600 businesses.

First, we must all understand, accept and make-use of the now well-known settled-science:

Grass and Brush wildfires are the elephant in the room, *not forest fires*.

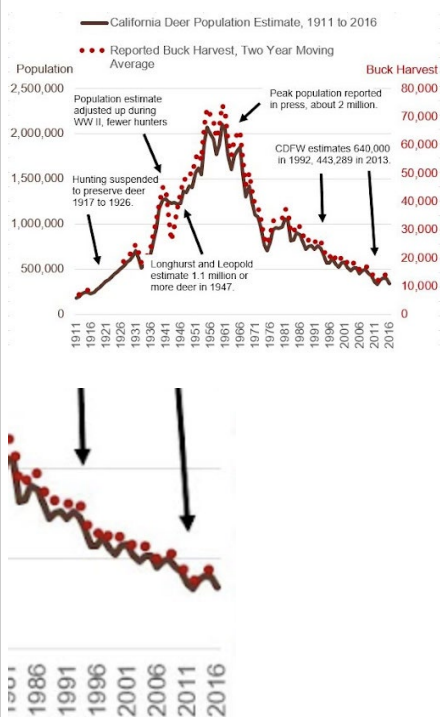
### Why are Grass & Brush wildfires the so-called 'elephant in the room'?

1. Grass and Brush wildfires represent approximately **66% of all wildfires** over the past 35-years, according to a recent published study.



Source: Radeloff, Mocklin, Helmers, et al., Science. Notes: Area burned was calculated using wildfire perimeters from the Monitoring Trends in Burn Severity (MTBS) program. Data is for the contiguous U.S. By The New YorkTimes

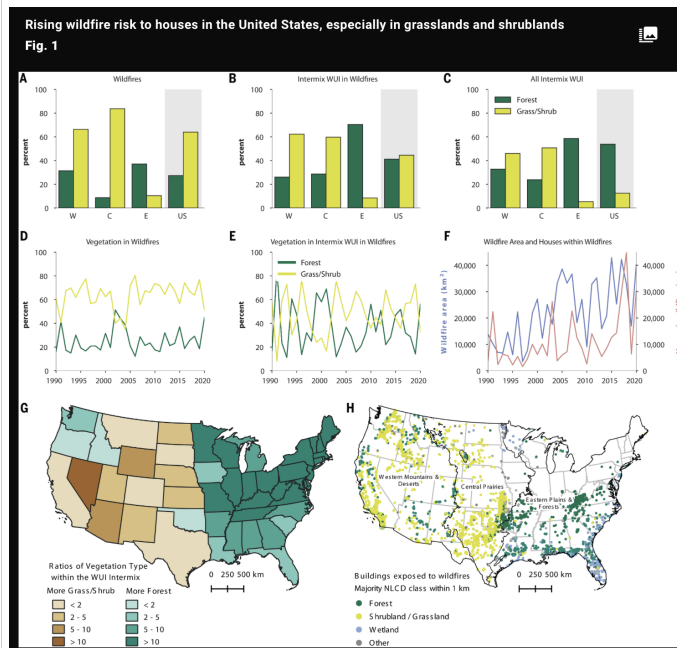
And if we compare the graph above showing increase in grass & brush fires, to the graph below showing the collapse of the cervid (deer) population in California, the inverse correlation is very very clear... when we lose of herbivores, catastrophic wildfire evolves, and has evolved.



The deer population has continued its collapse in CA since 2016, to the present. Current population estimates suggest *less than 400,000 deer* in the entire state of California. Today there is just one deer for every 250-

acres in CA. Just 65 years ago, there was one deer for every 46-acres, if we use candy-coated data. Many hunting guides I have spoken with, *who have a lifetime of experience*, suggest there are far less deer and elk than are even being reported by State officials.

2. Grass and Brush fueled wildfires cause far more loss of life and economic damages (not including suppression costs) than forest fires. The Los Angeles fires have already eclipsed \$250-Billion in economic damages. In 2017, *Courthouse News* reported that wildfires in CA caused approx. \$180-Billion in total losses. A vast majority of those wildfires were fueled by grass & brush, **not forests**.



Excerpt from Study by: Volker Radeloff - professor of forest ecology University of Wisconsin-Madison, Et, Al.

3. Published peer-reviewed *Studies* show that **restoring the herbivory** (using species that consume grass and brush) **will reduce the frequency, size and intensity of catastrophic grass and brush wildfires**. <https://royalsocietypublishing.org/doi/10.1098/rstb.2017.0443>

It's a fact that forest fires are a serious problem, and logging makes sense when done right. But, according to all the empirical data from wildfire forensic reports, InciWeb, published scientific studies and Insurance Industry Data, *Grass and Brush fueled wildfires are the biggest problem we face by a very large margin*.

### 3. We Know How To Reduce Grass & Brush Wildfires.

**We also now know what didn't and won't work cost-effectively at-scale and why.**

#### a. Prescribed Fire (aka: RxFire and Controlled Fire):

RxFire is NOT scalable onto the hundreds of millions of acres in western states requiring annual grass and brush fuels management. It's not even scalable or guaranteed safe for use on thousands of acres. And it **doesn't matter whose doing the burning (BLM, USFS, Indigenous)** as experience shows. Facts how that the risks of using RxFire far outweigh any benefits, and in fact, cause harm to soils, native seed banks, watersheds, and ecosystems, including flora and fauna. And that's because the use of Rxfire on landscapes with abnormal (unnatural) fuel loads stemming from a collapsed herbivory burns so hot, it damages the ecosystem. Study from DRI: <https://www.dri.edu/low-severity-wildfires-impact-soils-more-than-previously-believed/#:~:text=According%20to%20two%20new%20studies,ways%20that%20are%20not%20immediately>

And using RxFire on landscapes with excessive fuels damages the ecosystem, according to many studies, and is cited in recent U.S. Forest Service (USFS) and Bureau of Land Management ("BLM") Resource Management Plans ("RMPs") as a issue of concern, limiting any proposed use of RxFire only after 'pretreatment' of fuels (very costly).

More here on adverse impacts of RxFire: <https://www.abc27.com/business/press-releases/ein-presswire/610215807/prescribed-burns-are-not-the-silver-bullet-suggested-for-wildfires/>

The costs incurred by loss of lives, homes and businesses from using Prescribed Fire over the last decade has been in the \$-Billions. The recent experience with RxFire in New Mexico fully supports this observation. Report Here: <https://sourcenm.com/2024/12/17/new-report-totals-hermits-peak-cal-canyon-fire-losses-at-5-14b-as-extra-funds-hang-in-balance/>

Added to all the foregoing, a recent *UCLA Study* shows that toxins in wildfire smoke (includes RxFire) is killing thousands of Californians each year, and over their 10-year Study, ~55,000 Californians died prematurely and the economic loss from that was about \$435-Billion. <https://e360.yale.edu/digest/wildfire-smoke-deaths-california>

b. Mowing, mulching and bio-massing: The simple truth is that limited access to remote vacant wild-lands and rugged terrain, radically reduce any areas suited to this treatment, and is nevertheless time consuming and costly, and here again, is required annually and is expensive.

c. Proposed use of herbicides: It almost goes without saying that using chemicals in remote wilderness is begging for an ecological disaster on many levels, including the loss of soils stabilization by grass and brush, which leads to catastrophic erosion and impacts on water quality and fisheries, just to start.

d. Logging and thinning forests. While thinning forests make sense for forest health, and modern ecologically sensible logging must be implemented in appropriate areas, it fails to address the much larger problem related to managing Grass and Brush.

### What Does Work?

We can and must reestablish the herbivory in the order that is expedient and logical:

1. We have 70,000 publicly-owned wild horses languishing in off-range holding corrals (feed lots). These horses are castrated and sterilized (non-breeding). These horses are currently costing taxpayers about \$150-Million/year to feed ... grass.

These horses (any number from 1 to a 1,000) are available to ANY government body (town, city, state, county fire dept, etc.) via the 'Humane Transfer of Excess Animals Act'. The law allows these horses to be taken and used as 'work animals' under the [existing Law](#). And using them for wildfire fuels management in the appropriate vacant lands is work.

The details of how that Law would work to get these important herbivores located into remote vacant wild-land areas, not suited for cattle, sheep or goats, was covered by two lawyers who are known experts in this Law. HERE:

Legal Path To Rewilding Horses Under H.R. 1625: <https://www.siskiyou.news/2024/01/02/a-legal-path-to-rewilding-horses-under-h-r-1625/>

Geldings and sterilized mares from this path (#1) are gentle-giants and just want to eat and nap under a tree. As such, can provide fire fuel breaks in the hills around urban areas unsuited for goats, sheep or cattle due to predators (wolves, cougars and coyotes). They are easily confined with standard ranch fencing, while is the only relevant cost other than provision of a water trough.

More in this ABC NEWS video:

ABC NEWS Medford: [https://www.kdvr.com/video/more-wild-horses-equals-less-fire-fuels/video\\_8b3c4ab9-9e43-5c6f-ae4b-89351b795ab1.html](https://www.kdvr.com/video/more-wild-horses-equals-less-fire-fuels/video_8b3c4ab9-9e43-5c6f-ae4b-89351b795ab1.html)



Here are a few important 2-min videos for your consideration... Please watch them...

1. <https://www.youtube.com/watch?v=XEFZq47Xmw>
2. <https://www.youtube.com/watch?v=yRUNEYgiSnc>
3. <https://www.youtube.com/watch?v=Sr-Y9kcSRbA>
4. <https://www.youtube.com/watch?v=XFAK798pgGw>

Finally, Wild Horses bring tourism dollars into counties that have even small herds!



Unlike ruminants that digest the seeds of grasses and plants, horses do not digest these important seeds. The trick is to manage grass and brush but also allow the soils to be stabilized from erosion. Goats, sheep and cows are all ruminants and digest the seeds they consume. Science has proven

that ruminant grazing results in a depleted seed-bank (un-germinated seeds on the ground). Therefore, in areas where erosion is not a concern (industrial areas, airport surrounds, etc,) goats make sense. In hillsides and mountains that need soil stability, horses are the clear choice.

I am considered an expert by local, state and federal officials in this regards, as you can read below And I am available to consult on all aspects of such a project, based upon my experience with our herd.

SEE BELOW FOR BONA-FIDES

Respectfully Submitted,

William E. Simpson II  
Founder - Exec. Director - Wild Horse Fire Brigade  
Ethologist - Author - Conservationist  
Wild Horse Ranch



From the Office of

## OREGON STATE REPRESENTATIVE COURT BOICE

November 15, 2024

Court Boice - Oregon State Representative, District 1:

Captain Bill Simpson is highly respected throughout the Western United States. He is a True Patriot, Principled, Hard Working, a Cost Cutter and completely Ethical. Captain Bill is a logger, rancher, and scientist. He is a strong philosophical, historical and fiscal conservative. His empirical experience in Natural Resources, Wildlife, Fire Fighting, Wise Timber Management, and protecting our Environment is without equal in the USA and in particular when it comes to our North American Wild Horses. I have worked with Bill Simpson for almost 10 years; however, he has been a good friend much longer. I can offer substantial evidence that Captain Bill is the premiere knowledgeable person in the World related to North American Wild Horses and Burros. He has a solid background and in my view is unquestionably your best choice for Director of the BLM Wild Horse and Burro Program. I urge you to immediately take advantage of his superior experience! We need Bill Simpson in this very important position. I can personally attest (and thank goodness) Captain Bill has always been a Donald Trump supporter. Please do not hesitate to contact me for any additional information. 541.661.6150

**COURT BOICE, Oregon State Representative – District 1** - including Curry and parts of Coos and Douglas Counties. [Rep.CourtBoice@OregonLegislature.gov](mailto:Rep.CourtBoice@OregonLegislature.gov) Phone (503) 986-1401

*Coos, Curry, and Douglas Counties – The beautiful Southwest Corner of Oregon - The Timber Capitol of the World, Greatest Ocean, Most Pristine Rivers, Best Fishing, Finest Wines, Healthiest Cranberries, Rarest Easter Lilies, Best Golfing, and our World Wildlife Safaris – We invite you to visit soon.*

[https://www.wildhorsefirebrigade.org/\\_files/ugd/b50928\\_d4424087009e4d319c0915981ebcbf25.pdf](https://www.wildhorsefirebrigade.org/_files/ugd/b50928_d4424087009e4d319c0915981ebcbf25.pdf)

GREG WALDEN  
SECOND DISTRICT, OREGON  
ENERGY AND COMMERCE  
COMMISSIONER

3-8466 VIA WEBSITE  
<http://www.gregwalden.com>



Congress of the United States  
House of Representatives

April 1, 2019

Dorothea Boothe  
Acting Wild Horse and Burro Program Specialist  
Bureau of Land Management  
1849 C Street NW, Room 2134 LM  
Washington, DC 20240

Ms. Boothe,

As you know, the management of wild horses continues to be a challenge across Oregon and the West. As the Bureau of Land Management continues to work towards long term solutions, the Wild Horse and Burro Advisory Board (Board) will play an important role. I have been contacted by Mr. William Simpson regarding his interest in service on the board and ask that you give his application full and fair consideration.

As you will see in Mr. Simpson's resume, he brings a diverse background as well as firsthand experience with managing wild horses on his own property. Most recently, he has been actively engaged in the public discourse around wild horses and wildfire management. He strongly believes this background will be a solid asset to the Board.

As you work to fill the vacant seats on the Board, I again strongly urge you to give full and fair consideration to Mr. Simpson's application.

Best regards,

  
Greg Walden  
Member of Congress

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## Elko County Board of Commissioners

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Jon Karr  
Rex Steninger

**Elko County Manager**  
Amanda Osborne

**Executive Assistant**  
Michele Petty

**Receptionist/Clerical**  
Ashley Dent

April 12, 2024

To Whom it May Concern:

On April 3, 2024, the Elko County Board of Commissioners unanimously supported development of the plan put forth by Mr. William Simpson of the Wild Horse Fire Brigade to humanely remove horses from areas of conflict in Elko County and "re-wild" them as families to the forests of the Pacific Northwest.

Commissioner Rex Steninger explained it was obvious the status quo regarding wild horse management is not working and is costing the taxpayers billions of dollars. "We urge you to consider something different. Please allow us to develop this program."

Commissioner Delmo Andreozzi described the plan as an example of American ingenuity.

Mr. Simpson's personal commitments towards advocating for better treatment and utilization of wild horses through a multi-faceted, science-based approach indicates the program could be an