

February 8, 2022

Commissioner Joel Bousman  
Chair, Public Lands Steering Committee  
National Association of Counties

RE: Wildland Fire Management

Dear Commissioner Bousman,

We are writing you as fire and forest scientists who work closely with land managers to study wildland fire management issues around climate, vegetation and fuel buildup, and fire. We recognize and appreciate the challenges and impacts that communities have experienced from wildfire, in large part because many of us live and work in areas that are at risk from wildfire. Many of us have been evacuated from our homes and have first-hand experience with the serious impacts that wildfires and smoke are having on communities. However, we are gravely concerned about the recent proposed interim resolution requesting the US Forest Service undertake NEPA analysis of national wildland fire policy and immediately suppress all fires until a decision is reached. Attempting to extinguish all fires<sup>1</sup> is a losing proposition that is based on a misunderstanding of current policy and an outdated notion of what is operationally feasible. It takes tools out of the management toolbox at a time when we need them the most, and it disregards local knowledge, ecology, needs, and opportunities.

*Wildfire management policy and tactics*

The discussion around managed wildfire has long been fraught with unclear terminology and dangerous mischaracterizations about US Forest Service policy. Contrary to popular thought, the USFS does not have a “let burn” policy. The 2009 Guidance for Implementation of Federal Wildland Fire Management Policy allows federal agencies to manage natural ignitions for resource benefit if specific planning documents are in place and conditions are appropriate. This management decision is only ever made when weather and fuels conditions are conducive to fire having beneficial effects on the ecosystem. However, it is not uncommon for other fires to be mislabeled as managed wildfires, causing confusion and distaste for the 2009 guidance.

The 2021 Tamarack Fire in California, which started in the Mokelumne Wilderness and was initially being monitored, is a good example of a fire that was *not* being managed for resource benefit, but was wrongly labeled and politicized as such by the public and legislators. In that particular case, the country was at Preparedness Level 5 (PL5, the highest level of resource drawdown), and there were insufficient resources to allocate to a fire in a wilderness area when there were towns to protect. Tactical decisions like these—which are often made in triage mode and based on resource availability, unprecedented fire weather and fire behavior, and/or serious

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<sup>1</sup> *"NACo urges the United States Forest Service to immediately issue the Wildland Fire Management Direction of Initial Fire Attack (to extinguish immediately) for the pending fire season and throughout the year to extinguish and contain wildland fire and any prescribed fire that for any reason breaches containment."*

safety concerns—are often misinterpreted as managed wildfire, threatening a management tool that is in reality used only with careful consideration and planning.

*Keeping tools in the toolbox*

As we have seen over the past few years, especially in California and Colorado, we are now experiencing conditions that are causing extreme fire behavior, which is in part due to past full suppression policy. The best management approach we have to combat this phenomenon is reducing the amount of fuel available to burn. Similar to how important thinning and prescribed burning are around our communities, the ability to manage wildland fires at appropriate times is equally important for reducing fuels in the wildland environment. We will never be able to reduce fire risk to communities with thinning or prescribed fire alone—we need all hands on deck, and all the tools in the toolbox.

The infrastructure bill will give the USFS much-needed resources to implement thinning and prescribed burning treatments to start tackling the enormous backlog of fuels reduction treatments needed in the wildland-urban interface. However, wildfires in the backcountry and wilderness areas still pose many direct and indirect threats to communities, and there is simply not enough money, time, or physical access to manage this risk with anything other than fire. When wildland fires are managed for resource benefit, the consumption of fuel limits the amount of energy the next fire has to burn. Managing wildland fires for resource benefit when weather and fuel conditions will support good outcomes (such as fuel reduction) will help prevent fires from blowing up and threatening communities when it is hot, dry and windy.

*Blanket policies disregard local knowledge and ecology*

Each place has its own needs and opportunities, and land management must be considered within the context of local knowledge, ecology, and community. Blanket national policies, like this proposed resolution and USFS Chief Moore's order last summer, can actually place communities at greater risk. While California was burning during 2021, the southwest and southeast were getting the kind of moisture that creates excellent burning conditions. A blanket policy tied manager's hands and limited their ability to burn all of the new growth the rains caused. Rather than pushing for a national fire suppression policy centered on mischaracterized tactics, let's work together to find ways to better incorporate local knowledge and priorities into future fire management and response.

There is no possibility of a future without fire, but there can be a future with better fire. We would welcome an opportunity to speak with you about our concerns, and to come up with long-term solutions to meet our shared goals of wildfire risk reduction and community resiliency.

Sincerely,

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