

August 10, 2021

Randy Moore, Chief
USDA, Forest Service
1400 Independence Ave., SW
Washington, D.C. 20250-0003

RE: Wildland Fire Management

Dear Chief Randy Moore,

We are a group of fire and forest scientists who study the range of interactions of fuels, fire, climate, and management. We are writing to express concern over your new directives to stop managing fire for resource benefit and requiring regional Planning Level 2 and Regional Forester approval for prescribed burning. Certainly, we recognize the underlying rationale to address short-term risks of escaped wildfires. Even if temporary, these directives will significantly limit options for resource managers in a time when increasing the pace and scale of forest restoration and fuel reduction is of critical importance. We request that you consider modifying the order, returning decision making about managed fire and prescribed burning to the forest and district levels.

Forests across the western US are naturally fire-prone, with fire return intervals ranging from years to decades and even centuries. Fire exclusion, along with historic logging that removed larger fire-resistant trees, are in part responsible for our current fire and forest management challenges, with changing climate increasingly acting as a force multiplier. Both the science and management experience around wildfire are clear – we are not able to exclude fire from these systems indefinitely, no matter how much we invest in direct suppression. Unintentionally, a policy of full suppression contributes to fuel accumulation across fire-prone landscapes and only allows for escaped wildfires in the height of fire season to burn. If we seek to modify the way fire burns across our landscapes, we cannot afford to lose any more management opportunities. Our choices are to manage fuels and change the way fire behaves or continue suffering significant impacts indefinitely.

Given the challenges associated with increasing the pace and scale of restoration thinning and prescribed burning, managing natural ignitions is one of the only ways to accomplish the needed work, especially on steeper ground and in remote areas. Restoration thinning and prescribed burning are the tools that will allow fire managers to achieve resource benefit from natural ignitions. We need to view these challenges holistically and recognize that when natural ignitions occur during conditions that are within prescription, fire will help us meet a range of objectives including community protection and firefighter safety. That said, managing fire is not without risks, but the cumulative risks are lower than continuing to try and suppress all fires into an increasingly climate-stressed future. Record-setting wildfire events that escape suppression are a testament to why a continued policy of full suppression is risk-prone and unsustainable.

Climate change is increasing the flammability of our wildlands, but climate change is not simply a slow steady march toward warmer and drier conditions. If we have learned anything over the

past decade, increased climate variability on top of warming and drying is leading to record setting extremes over time and space and we have more in store. Managers need tools like managed fire and the ability to make decisions on a forest level to take advantage of the increased variability we are experiencing. For example, while California and the Northwest are burning this summer, the Southwest is having an exceptionally wet monsoon and conditions are now optimal for safe and effective fire use in many locations. This sort of regional variability in climate (and fuel) conditions is common, and to some extent predictable. Favorable climatic windows provide essential opportunities to safely achieve urgent fuel treatments but only if managers are provided the flexibility to be able to react to this variability at the scale of forests and districts. A blanket national policy focused on reducing short-term risks does not account for the fact that our national forests and grasslands cover a large geographic area that experiences a wide variety of climatic conditions.

Your support as Regional Forester for expanded fire use was important for moving Region 5 toward meeting restoration objectives and helping to mitigate the risk of impactful wildfires. That science-based approach is needed nationally, and it is more important than ever that fire managers have a full suite of tools at their disposal. We are in a tough situation from a fire perspective. Our national history of fire exclusion – exacerbated by changing climate and insufficient federal investment in forest and fuels management – means that we need to simultaneously suppress ignitions during the hotter and drier parts of fire season, while working to reintroduce fire during the cooler and moister parts of the season. Our national forest system requires science-based leadership, even when political pressure is high. Decades of research supported your decision to facilitate managed wildfire in the newly amended forest plans in California, and that research supports the same management action across much of the western US.

The scientific literature strongly supports the use of ecologically appropriate fire in many US forest types, and restoring fire is one of the primary tools we have for limiting future risk from additional human-caused warming and drying. Past fires are a critical management tool in wildland firefighting operations. Restoring fire to our forests through prescribed and managed wildfires can lead to long-term reductions in suppression costs and the societal and environmental impacts of severe wildfire seasons. We have far too much fuel buildup stored in most of our forested landscapes, and when combined with extreme fire weather, continued fire exclusion puts firefighters, communities, and historical ecosystems at risk. The US Forest Service and other federal land management agencies should work with their state partners to help local leaders and residents understand the objectives and benefits of managed fire and to help them understand that fire and forest professionals are making science-based decisions about fire management. The number of examples of successfully managing natural ignitions far exceed the few cases with negative outcomes. The US Forest Service needs to advertise its successes and make the linkage to the 2009 decision that allows the flexibility to manage fires in a manner that is appropriate given the conditions.

We appreciate your consideration of this request. We would be happy to provide more information on the diverse and abundant research that emphasizes the urgent imperative of restoring fire to many western ecosystems.

Sincerely,
Matthew Hurteau, Ph.D.
Professor
Department of Biology
University of New Mexico

Craig D. Allen, Ph.D.
Adjunct Professor
Department of Geography &
Environmental Studies
University of New Mexico

John Abatzoglou, Ph.D.
Associate Professor
School of Engineering
University of California, Merced

James K. Agee, Ph.D.
Emeritus Professor
School of Environmental and
Forest Sciences
University of Washington, Seattle

John Bailey, Ph.D.
Professor
Oregon State University

Brian Buma, Ph.D.
Associate Professor
Integrative Biology
University of Colorado

C. Alina Cansler, Ph.D.
University of Washington

Jonathan Coop, Ph.D.
Professor
Natural & Environmental Sciences
Department
Western Colorado University

Alison C. Cullen, Ph.D.
Daniel J. Evans Endowed Professor
Evans School of Public Policy &
Governance
University of Washington

Susan Prichard, Ph.D.
Research Scientist
School of Environmental and
Forest Sciences
University of Washington

Scott Stephens, Ph.D.
Professor
Department of Environmental Science,
Policy, & Management
University of California, Berkeley

Thomas W. Swetnam, Ph.D.
Emeritus Professor & Director of the
Laboratory of Tree-Ring Research
University of Arizona

Solomon Dobrowski, Ph.D.
Professor
Dept Forest Management
University of Montana

Christopher J. Dunn, Ph.D.
Assistant Professor
College of Forestry
Oregon State University

R. Keala Hagmann, Ph.D.
Affiliate Assistant Professor
University of Washington

Philip Higuera, Ph.D.
Professor of Fire Ecology
University of Montana

Chad Hoffman, Ph.D.
Co-director Western Forest Fire Research
Center
Colorado State University

James Johnston, Ph.D.
Department of Forest Ecosystems & Society
Oregon State University

Jeffrey Kane, Ph.D.
Associate Professor
Department of Forestry &
Wildland Resources
Humboldt State University

Van R. Kane, Ph.D.
Research Assistant Professor
University of Washington

Maureen C. Kennedy, Ph.D.
Assistant Professor in Quantitative Fire
Ecology and Forest Management
University of Washington, Tacoma Campus

Leda Kobziar, Ph.D.
Director, Master of Natural Resources
Associate Professor of Wildland Fire
Science
University of Idaho College of Natural
Resources

Susie Kocher, M.S.
Forestry Advisor, Registered Professional
Forester #2874
University of California Cooperative
Extension
El Dorado, Calaveras, Amador and
Tuolumne Counties

Crystal Kolden, Ph.D.
Assistant Professor of Fire Science
School of Engineering
University of California, Merced

Meg A. Krawchuk, Ph.D.
Associate Professor
Department of Forest Ecosystems and
Society
College of Forestry
Oregon State University

Andrew J. Larson, Ph.D.
Wilderness Institute and Dept. of Forest
Management
University of Montana

Dave McWethy, Ph.D.
Associate Professor
Department of Earth Sciences
Montana State University

Penelope Morgan, Ph.D.
Professor Emerita
University of Idaho

Max Moritz, Ph.D.
UC Cooperative Extension Wildfire
Specialist
Bren School
University of California, Santa Barbara

Lenya N. Quinn-Davidson, M.A.
Area Fire Advisor, University of California
Cooperative Extension
Director, Northern California Prescribed
Fire Council

William H. Romme, Ph.D.
Professor emeritus and Senior Research
Scientist
Department of Forest and Rangeland
Stewardship and Natural Resource Ecology
Laboratory
Colorado State University

Robert Scheller, Ph.D.
Professor of Landscape Ecology
North Carolina State University

Brian Smithers, Ph.D.
Research Assistant Professor
Department of Ecology
Montana State University

Erica A.H. Smithwick, Ph.D.
Distinguished Professor of Geography
Associate Director, Institutes of Energy and
the Environment
The Pennsylvania State University

Camille Stevens-Rumann, Ph.D.
Assistant Professor
Forest and Rangeland Stewardship
Colorado State University

Alan Taylor, Ph.D.
Professor of Geography and Ecology
Interim Director Earth and Environmental
Systems Institute
The Pennsylvania State University

Andi Thode, Ph.D.
Professor
School of Forestry
Northern Arizona University

Ryan Tompkins, M.F.
Forester & Natural Resources Advisor
RPF No. 3108
University of California Cooperative
Extension
Plumas, Sierra, and Lassen Counties

LeRoy Westerling, Ph.D.
Professor of Management of Complex
Systems
University of California, Merced

Park Williams, Ph.D.
Associate Professor
Department of Geography
University of California, Los Angeles

Larissa Yocom, Ph.D.
Assistant Professor
Department of Wildland Resources
Utah State University