

Appendix A.24. The Concept of *Managed Wildfire* [Expanded]¹

In the October 2022 *Smokejumper* Quarterly Magazine [pages 10-14], I thought the article by Robert Hirning entitled “Forest Fires and National Defense Policy” was especially informative and instructional. I believe much of his piece coincides quite closely with the document entitled, “America’s Forests in the Balance: A National Emergency [*A Call to Action*]” – a continuing text developed by 60 [and counting] professionals over the least three years. The section in *A Call to Action – The Concept of Managed Wildfire* [pages 10-11] – is especially well-linked to Hirning’s contribution. Accordingly, it seems prudent to share *The Concept of Managed Wildfire* in the *Smokejumper*.

Managed wildfires are natural ignitions [some refer to them as “unplanned”] which under suitable weather and soil moisture conditions are allowed to burn to meet desired ecological objectives where pre-planned and approved in Forest Plans for the National Forests. This allows fire to play a natural role in restoring the ecosystems by recycling nutrients into the soil and clearing the forest floor of excessive debris. The key is to identify the right kind of fire at the right time at the right place. However, relying on natural ignitions to instantly create an opportunity for a managed wildfire in a random location, without adequate planning and pre-positioning for resources is “...like playing a game of Russian Roulette” as a very respected colleague once concluded. This [*managed wildfire*] is not to be confused with “Prescribed Fire” which is conducted under very specific conditions.

Action item No. 2 on the list of “Top 10 Action” in *A Call to Action* calls for – without exception – the elimination of *managed wildfire* for the foreseeable future. The reality is, with the clogged-up conditions of our forests; hard to predict weather events; and the extremely high level of expertise required to perfectly “herd” a wildfire, *managed wildfire* quickly becomes an escaped fire. Thus, for now, the notion of effectively directing a wildfire to help restore the forest has become largely an intellectual argument and puts others needlessly in harm’s way; causes deaths due to smoke inhalation; and, significantly increases fire suppression costs that continue to shift more funds away from badly needed traditional forest maintenance and the associated loss of critical habitat, wildlife, and soil stabilization from various plant growth.

Further, with the risks associated with the COVID-19 pandemic, the notion of letting fires burn to help accrue forest restoration targets is unconscionable. There is a strong connection between smoke inhalation and the more dire effects of Covid-19. In addition, coronavirus cases in the United States have recently surged with the spread of the highly transmissible variants.

Messages on *managed wildfire* are extremely mixed. On one hand, national direction from USDA Forest Service leaders seems to suggest no more *managed wildfire* due to current conditions. Events on the ground show a far different scenario. This misguidance may be due to available budgets and candidly, stale Forest Service research that promotes *managed wildfire* regardless of different times and conditions [read, promoting an intellectual narrative] [see Note on page 96]. Please know that a steady flow of funding from fire suppression is being used to

¹ Michael T. Rains, Substitute Teacher, Commonwealth of Pennsylvania and former USDA Forest Service employee, September 30, 2022. Published in *Smokejumper Magazine*.

manage wildfires or in reality, attempt to manage a wildfire. The application of pre-approved and planned prescribed fire comes with a much more constrained budgetary account. Using an unplanned ignition as a de facto prescribed fire and claiming land restoration credits is simply wrong. Perhaps an Office of Investigation [OIG] accounting of this practice is warranted.

As stated above, the practice of *managed wildfire*, especially in the western part of our country, is a huge gamble that can quickly accelerate to an “escaped fire.” This has become all too common in recent years, regardless of good intentions. And, regardless of weather and all the other “fire factors,” the practice of *managed wildfire* requires far too much knowledge and authority by the person making this immediate call; frankly, it’s not a fair fight. There are simply too many factors at risk. The unpredictability of the fire and its destruction in this current time and place will always win.

The outcome of prescribed fire is much more predictable. In recent studies, prescribed fires have shown to be much safer and if deployed carefully and under the right conditions can significantly help reduce hazardous fuels. Increased appropriations by Congress for prescribed burning is a critical step in the right direction.

The concept of *managed wildfire* must be stopped and the careful use of *prescribed fire* needs to be a key tool in a pragmatic forest maintenance regime. It is interesting to note that recently, an extremely well-respected former Forest Supervisor for the USDA Forest Service stated: “...If I were Chief, I would never allow *managed wildfires*; not this year, not EVER.”

Or, as an anonymous Forest Service employee so clearly stated: “...I try to point out the fact that if you’re not out conducting Rx fire [*prescribed fire*] right now, why in the hell do you think you could manage a fire for resource benefit[s].”

Managed wildfire seems to be, as many have suggested, an intellectual theory, that should never be applied, while *prescribed fire* is a great tool that needs much more application and funding.

Here is the bottom line: It is time to declare that all wildfires will be promptly and aggressively extinguished, period; no exceptions. Extremely clear direction is a must. And this direction must be corporately followed. For example, the word “manage” means: to handle or direct with a degree of skill: such as to exercise executive, administrative, and supervisory direction. To us, this means a very hands-on approach. Backing off to the “next best ridge”, while perhaps workable, can hardly be called a “hands on approach.”

On August 2, 2021, the newly appointed Forest Service Chief sent a letter to his leadership team regarding the use of managed wildfire. The key points of the letter: managing wildfire for resource benefits is a strategy we will not use. In addition, “...until further notice, ignited prescribed fire operations will be considered only in specific geographic areas and only with approval by the national office.”

We must be diligent to ensure that clear direction is followed, and for the foreseeable future, all wildfires are to be extinguished immediately; no exceptions. Unfortunately, it looks like the Chief’s letter is *not* being corporately followed. Examples include the recent Tamarack, Dixie

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and Caldor Fires in California. In fact, America's Chief Forester published a letter on December 20, 2021 that seems to reverse his position on August 2, 2021, regarding *managed fire*. Where we are now is so unclear. This is unfortunate. The American people deserve better.

Some have called me out on my current stance regarding *managed fire*. That's fair. In 2018, my colleague Tom Harbour and myself wrote an essay in "193 Million Acres: Toward a Healthier and More Resilient US Forest Service" entitled, "Restoring Fire as a Landscape Conservation Tool: Nontraditional Thoughts for a Traditional Organization." From an intellectual point of view, I love this essay. But, NOT NOW. These are different times. With the current land conditions and the impacts of a changing climate, the notion of allowing a fire to burn anywhere, for whatever reason, for the foreseeable future, is unacceptable and must be stopped now; no exceptions.

In my view, for now, a dominant Forest Service goal in 2023 and ahead, should be to put out all unplanned wildfire ignitions within 24 hours, no exceptions. I beg you, please help make this a cornerstone of America's Chief Forester's annual Letter of Intent for the next decade, at least. The credibility this stance will afford the USDA Forest Service, if corporately deployed, will be immeasurable. We believe the American people expect this on *their* lands. The current landscape conditions will not enable "managed fires" or "beneficial fires" or a "let it burn" policy.

Note: Perhaps I² should have used a different phrase than "intellectual argument" when referring to "manage" or "beneficial" fire. Clearly, the phrase is correctly attributed to me. The phrase is coming from my background as the Director of the Northern Research Station and the Forest Products Laboratory, USDA Forest Service. Forest Service scientists, who make productive careers out of a particular line of science can be very reluctant to adjust with the times. The rewards system in science is not very conducive to change. Thus, some things become "intellectual" arguments. That is, the "science-based" narrative does not reflect the current times or land conditions, in this example. For me, it doesn't do any good to reference fire tactics that may or may not have been used 100 years ago. We must be more contemporary to address the practicality of using "fire on the landscape." Ask the people in Paradise, Greenville or Weed, California what they think.

Clearly, I do not believe that fire as a forest maintenance tool has always been an intellectual argument, in total. I refer you to my essay with Tom Harbour, "193 Million Acres: Toward a Healthier and More Resilient US Forest Service, page 129, "Restoring Fire as a Landscape Conservation Tool: Nontraditional Thoughts for a Traditional Organization", 2018, The Society of American Foresters, Steve Wilent, Editor.

If you read the essay, you can clearly see that I believe in fire as a forest maintenance tool, when it is "...at the right time, at the right place and the fire is right." Frankly, since I crafted the *National Fire Plan* twenty years ago, I have not seen too many of these situations [i.e., the three "rights"]. Thus, I conclude for NOW, it is not the time to "back off to the next best ridge." The conditions won't allow it. And, let's look at the facts. Over the last decade especially, when we *manage* fire with the current land conditions and the current operative skill set, it has been largely a mess [Dixie, Caldor, Tamarack Fires, as examples].

² Rains, Michael T. A phrase, "intellectual argument", when referring to "manage" or "beneficial" fire.

So, all I am saying is, for NOW, until the forests are in a better condition to accept fire as a maintenance tool, let us have an objective to put all fires out immediately. Then, when the forests [forests are more than just trees] are more accepting, we can and should use fire, under prescription, to meet resiliency objectives. Yes, this will take time. But like our former Chief, F. Dale Robertson often said, "...the Forest Service is in it for the long haul." The Chief's annual Letter of Intent for Wildfire for 2024 would be a grand step forward if the letter included the aforesaid objective.

Note: We must continually understand that the current concept called "managed fire" is not the same as "prescribed fire." Prescribed fires, also known as prescribed burns, refer to the controlled application of fire by a team of fire experts under specified weather conditions to restore health to ecosystems that depend on fire. Prescribed fire is often used to mimic the low-intensity fire that would have naturally occurred on the landscape. It's an important forest maintenance tool that benefits forests and wildlife, while also helping to reduce the impact of wildfire hazards. Prescribed fire is truly a planned fire that is being carefully managed. Please read the very instructional and impacting article in Evergreen™ by Jim Peterson, entitled [*Managed Fire or Misfire?*](#), August 29, 2020, to help better understand the differences between "prescribed fire" and the current notion called "managed fire."