

## The Concept of *Managed Wildfire*<sup>1</sup>

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For a day or so, I have been thinking about whether or not I should share my voice on this subject of “managed” wildfire, or not. Nothing suggested lately (i.e., the past 7 years or so) seems to have had any merit for change. While I love the USDA Forest Service, as many have said before me and after, the agency has a super strong core belief of “not invented here.” That is, if they do not think of the notion first, and/or are not forced to comply, the agency feels “we know best.” Most often, candidly, that’s probably true. However, when it comes to the concept of “managed” wildfire, the agency is dead wrong and the blinders will not be removed.

A key piece to address this issue is the annual “Chief’s Letter of Intent [LOI] for Wildfires.” This letter is critical in its importance. In my view, the most important piece of correspondence America’s Chief Forester can send to her/his employees to clearly and compassionately deliver direction on the pending wildfire season. The 2024 LOI was anything but clear, compassionate direction.

It had no soul whatsoever. After reading it three or so time, one was compelled to say, “what is this?” I know, it is far easier to condemn the reader than to ever question *the* Chief. I get it. Still, that does not make the LOI any better. The 2025 LOI, theoretically written by another Chief, falls into the same category as the previous year. It lacks clarity, vibrancy and any life. A small army of really skilled professionals have pleaded with the Forest Service to be more direct in the annual LOI. That is, “First, Put Out the Fire.” So far, nothing changes.

Almost 3 million acres of forests (forests are more than just tress) burned in 2024 that did not have to burn. Let me say this in another way: 2.7 million acres of forests could have been spared from the destruction caused by wildfire if we had strived to put out every wildfire immediately with a strong initial attack. The added consequences were horrific because we decided that “managed”, “beneficial”, “monitoring”, “watching”, “let it burn”, was worth more than the thousands of lives lost if we simply considered increased smoke.

Letting wildfires burn longer creates more smoke. Imagine that. Yet, in spite of all the pleading based on thousands of years of experiences, nothing changes. It’s hard not to get discouraged. But we cannot give up. Putting out wildfires immediately in the right thing to do, for NOW. I try to point out that managing something wild does not typically work as planned. In terms of wildfires, they have a tendency to escape. So, instead of putting a wildfire out within ten acres, we “monitor” it for 13 days and 70,000 later, the fire is contained. The property damage and lives lost are simply consequences. Oh my gosh, I cannot believe the agency that was so inspiring has been so callous. That’s not right.

Then, we get bombarded by the intellectual argument that fire is good for the diversity and health of ecosystems. I agree with that notion. But, NOT NOW. America’s forests, especially the public lands, are in terrible condition.

About 100 million acres are being clogged from the results of 30+years of little or no maintenance. These forests need immediate care. The tactic cannot be letting a wildfire be the management tool; NOT NOW. With excessive fuels, the impacts of a similar climate cycle of thousands of years ago, and an ever-expanding development (i.e., the Wildland-Urban Interface), “monitoring” a wildfire NOW is just plain wrong. Ask yourself, in the last 30 years or so, are the forests more health, resilient and sustainable now? Of course not. Another group will say, that’s because we do not let wildfires burn longer. Well, if we continue to do what we

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<sup>1</sup> Michael T. Rains, Substitute Teacher, Commonwealth of Pennsylvania and former USDA Forest Service employee, May 4, 2025.

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are doing, the great western tree forests, as an example, will be brushfields in 20 years. I know, “what does he know; he’s just a *Sub*.”

The fact is, we know exactly what to do to turn this national emergency around. Yes, it will take time. A really efficient first step is the make your intentions clearly known. A great tool to do this is the annual LOI by the Forest Service. As one senior person still with the agency concluded, “it’s an easy lift.” I am trying to get the 2025 LOI amended. It would simply take one fundamental sentence to be included: “...in 2025, I am directing the agency to put out all wildfires immediately, with a strong initial attack; no exceptions.” That’s it.

While that amendment is being worked on, I would like to refresh your memory with a piece on “managed” wildfires written about 2+ years ago. For your information, the piece in its entirety it is located in the “A Call to Action” (rev. 19.0, November 7, 2024, Appendix A.24). Now that piece, Appendix A.24, as shortened. I have not changed a word so one can see how the thinking is progressing:

“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* 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*. 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* can quickly become an escaped fire. Thus, the notion of effectively directing a wildfire to help restore the forest has become largely an intellectual argument and puts people and property 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.

It is safe to say that *managed wildfire* is an extremely contentious issue. Messages on *managed wildfire* are mixed. The leadership at USDA Forest Service seems to be a strong advocate. Some of the rank and file, not so much. This misguidance may be due to available budgets and candidly, some *stale* Forest Service research that promotes *managed wildfire* regardless of different times and conditions [read, promoting an intellectual narrative] [see Note 1]. Please know that a steady flow of funding from fire suppression is being used to *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

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facto prescribed fire and claiming land restoration credits is simply very wrong. Perhaps an Office of Investigation [OIG] review 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 into 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 wildfire 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 sometimes, 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, the Chief’s letter was *not* corporately followed. In fact, America’s Chief Forester published a letter on December 20, 2021 that reversed his position on August 2, 2021, regarding *managed wildfire*. The 2024 Chief’s Letter of Intent for Wildfires seems to suggest to the field, “do what you think is right.”

Some have called me out on my current stance regarding *managed wildfire*. 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. Maybe NEVER. These are different times. With the current land conditions; the impacts of a changing climate; and, the

ever-expanding Wildland-Urban Interface, the notion of allowing a fire to burn anywhere, for whatever reason, is unacceptable and must be stopped now; no exceptions.

In the view of our group, a dominant Forest Service goal in 2024 and ahead, should be to try to put all wildfire ignitions out 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 wildfires” or “beneficial wildfires” or a “let it burn” policy.

See the following Notes 1, 2 and 3.

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**Note 1: Intellectual Argument.** Perhaps I<sup>2</sup> 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 very 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, for the use of *managed wildfire*. For me, it doesn’t do any good to reference fire tactics that may or may not have been used before now. We must be more contemporary to address the practicality of using “fire on the landscape” with today’s conditions. 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* over twenty years ago, I have not seen too many of these situations [i.e., the three “rights”]. Thus, I conclude 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 wildfires* with the current land conditions and the current operative skill set, it has not gone well [Tamarack Fire, California, as an example].

So, all I am saying, pleading actually, is until the forests are in a better condition to accept fire as a maintenance tool, let us have an objective to put all wildfires 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 Wildfires for 2024 would [could have] be [been] a grand step forward, if the letter included the aforesaid objective.<sup>3</sup>

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<sup>2</sup> Rains, Michael T. A phrase, “intellectual argument”, when referring to “manage wildfire” or “beneficial” wildfire.

<sup>3</sup> For the record, nothing that the *NWI and Others Group* recommended was included in the final 2024 Chief’s Letter of Intent for Wildfires.

**Note 2: An Impromptu Email Sent to the [NWI and Others Group](#).** What I am learning lately, I bet is not new to you all. But, it was a bit surprising to me.

First, the body of citizenry that strongly disagrees with the current USDA Forest Service policy on “managed wildfire” (let burn while taking inventory of the destruction) is much larger than I thought, including a wide-range of Forest Service employees who are very skilled in this content area.

Over the last several weeks I have been reaching out. I watch legislation being formed that initially included the stopping of “manage wildfires” and even the restoration of a more contemporary “10 AM policy” — only to have it dropped and replaced by a listing of foolishness that will not help with this National Emergency. Many of my still friends in the Forest Service will speak to me off the record, for fear of reprisal. They are embarrassed with the policy.

When I talk to others outside of our “group”, almost 8 out of 10 hate this tactic [“managed wildfire”]. When I talk to Hill staffers, the overwhelming majority think letting fires burn to see if restoration “accomplishments” can be accrued are ashamed at what is happening. So, I wonder who has USDA’s attention. And, accordingly, America’s Chief Forester’s attention. I have some ideas. My guess is that you all probably know. [One immediate response to this note, stated the “Wildfire Industrial Complex”].

I am heartened by the fact that so many still in the Forest Service and a lot of Forest Service retirees outside of our group are disgusted. I feel stronger than ever that this really destructive policy needs to be curtailed. I am committed to keep sharing my voice. I hope you will too. Clearly, we are not alone.

...Michael T. Rains, July 13, 2024

**Note 3: A Response to Note 2:**

First, we know where this poorly conceived notion of "**managed wildfire**" comes from; where it originated. Note that the proper term is "managed wildfire." Let's not head off on a rabbit [chase] by using "managed fire." The term to use and refer to is "managed WILDfire." Designed in the Rocky Mtn. Research Station by and then promoted by the then Deputy Chief for State and Private, supposedly for "long term ecosystem benefit." (**Note:** they did not, and have not, indicated the "short- and long-term ecosystem losses or impacts," such as: critical habitat, soil binding plants, erosive hydrophobic conditions, economically valued timber, to name a few. Some say the agency is now counting those purposely burned acres as "restoration accomplishments.")

This issue isn't up for debate; it's a FACT. The Chief has endorsed it openly.

Secondly, we are in a "National Emergency" situation. Why? Because there are now close to 100 million acres of National Forest that are in "dead and dying" conditions. Some States have already totaled those acres while others are estimated. USDA Secretary Vilsack refuses to acknowledge an acreage figure over 50,000 and therefore has not declared this massive fuel overloading as an "emergency" to take special action on.

This is where we are. In summary, it strikes me that neither the Sec. of Agri. nor the Chief of the USFS has the determination to change their current direction to adjust to the changing weather, or "burning hotter fuel conditions."

...Ted Stubblefield, July 13, 2024