

POSITION PAPER

National Wildfire Suppression Association

RE: APPROPRIATE MANAGEMENT RESPONSE

The Department of Agriculture's current program for the management objectives regarding wild fire suppression are referred to as Appropriate Management Response (AMR). In 2003, the *Interagency Strategy for the Implementation of Federal Wildland Fire Policy* fundamentally altered the AMR philosophy of the Federal Wildland Fire Policy. In 2008, proposed amendments that embraced a broader interpretation of AMR and were in alignment with the 2001 Federal Fire Policy, were piloted and evaluated. Upon evaluation of the 2008 piloted changes, a plan of action was created and implemented for the 2009 fire season. The broad application of AMR has led to a "let it burn" policy. After seeing the 2009 plan implemented, we have several key concerns with the current "broad" application of AMR.

1. Broad application of AMR has potential environmental and ecological effects. These effects include, but are not limited to:
 - A. The amount of environmentally damaging particles released in the air due to the broad application of AMR and a "let it burn" policy.

Wildfires are natural events which are not subject to National Ambient Air Quality Standards (NAAQS) or subject to standards for human health and welfare. The focus of smoke monitoring is fine particulate matter, particles less than 10 (PM-10) or 2.5 (PM-2.5), or 150 micrograms per cubic meter average over a 24 hour period, which impacts human health and visibility. The fires in Montana in August of 2000 were more than the NAAQS for several days at Stevensville and Missoula.¹

High smoke concentrations can last for several weeks. Generally the larger the fire, the higher the smoke concentration and larger the area impacted. A broader application of AMR will therefore lead to a dramatic increase of smoke concentration affecting a larger area and higher population of people and wildlife. Additionally, the particles released into the air from larger fires burning for longer periods of time have a detrimental effect on our atmosphere.

- B. Damage to and loss of natural resources, endangered species, watersheds, and old growth timber.

The Tumblebug Complex (September 2009) near Oakridge, Oregon burned 14,370 acres which included hundreds of acres of old growth timber and impacted wildlife such as spotted owl habitat. This was a fire where the broader application of AMR was used and implemented. It appears suppression expenditures were not commensurate with the values at risk on this complex of fires. The Willamette N.F. and Umpqua Land Management plans were updated to reflect the tactics employed and resource loss incurred. The tactics used specifically involved: a) point protection, and b) large scale burnout.

This fire resulted in damage to and loss of years of natural resource enhancement including billions of dollars invested in reforestation projects. From 1993 through 2002, reforestation treatments by the US Forest Service encompassed 3,133,514 acres. Timber Stand Improvement program activities during the same time frame, which include precommercial thinning, pruning, and fertilizing, encompassed another approximately 2,520,000 acres.² The investment by the US Forest Service alone in natural resource enhancement is in the billions of dollars. A broader application of AMR, allowing fires to burn for longer durations and potentially bigger in size puts this investment at risk.

2. Broad application of AMR has safety concerns:

- A. A “let it burn” policy, especially as it relates to larger incidents, produces safety concerns for firefighters and communities near the incident. Lessons learned from the past are not fully engaged in the current policy. Case in point is the Yellowstone fire that consisted of several large fires that burned 793,880 acres (or 36%) of the National Park in 1988. Thousands of firefighters were deployed from all over the United States to fight this fire, including 9,000 assigned at the peak of the fire. The suppression cost totaled \$120 million.

By 1968, the National Park Service had adjusted its fire management policies to reflect changing attitudes regarding the aggressive suppression of fire. From 1972, the National Park Service began allowing natural fires in Yellowstone to burn under controlled conditions recognizing the benefits of cleaning out the understory and dead plant matter, allowing economically important tree species to grow with less competition for nutrients. The “prescribed natural fire policy” appeared to be an effective way to manage fires, especially in the Yellowstone region. After the Yellowstone fires of 1988, these policies were updated to provide for stricter guidelines for the management of natural fires whereby fires that exceed the standards, as well as all human-caused fires, are to be suppressed.³

We are concerned that a broader application of AMR will result in the same sort of firestorms experienced with the Yellowstone fires of 1988. Not suppressing the fires when they are still small can lead to thousands of firefighters being put at risk once the fire becomes a large incident threatening life and property.

3. Broad application of AMR as it relates to NEPA:

- A. We are concerned that the broad application of AMR whereby a natural wildfire is used as a large “controlled burn” violates NEPA. Tactics used under a broad application of AMR often include large burn out operations. One of the prerequisites for wildland fire use is the adoption of a wildfire management plan by each Forest. To date, with the exception of the Rogue-Siskiyou National Forest, these plans have been developed without any public process and without any environmental analysis. We believe these plans should be developed consistent with the NEPA process and either an environmental assessment or environmental impact statement be developed. This would provide the public notice of the proposed action and the opportunity to comment on the proposal and the environmental analysis.

4. Broad application of AMR and its effects on private lands:

- A. The Forest Service does not account for the potential impacts on adjoining non-federal lands. These impacts are in two basic forms: the transfer of cost associated with suppression activities on adjoining lands and the liability for loss of private property. Both of these need to be fully developed and analyzed in the AMR process.

The purpose of this position paper is to influence the AMR policy in the following areas:

- Greater public awareness and transparency.
- A more judicial application of the policy resulting in less resource damage and threats to adjoining lands.
- Recognition of private land and the associated costs of protection and liability
- Greater awareness and accounting for the loss of resource values, both public and private, including but not limited to wildlife habitat, clean air, clean water, water quantity, timber, and aquatic and riparian habitat.
- Carbon accountability.
- NEPA process applied to development of wildfire management plans.

The application of AMR correctly can be a useful and efficient tool. The broader application of AMR can lead to disastrous results both in terms of environmental impact and loss of key ecological resources

Endnotes:

¹ Hammer, Bob (2002). "Bitterroot, 2000, Wildfire Smoke"pp. 1-2.

² United States Forest Service (2003). "National Summary: Reforestation and Timber Stand Improvement Report Fiscal Year 2002", p. 10.

³ Wikipedia. "Yellowstone fires of 1988." pp. 2-4.