

August 10, 2021

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

Dear Chief Moore,

We are writing concerning your recent decision to discontinue the use of wildfire managed for resource objectives as well as all prescribed fire ignitions in areas at PL 3 or greater. The 2021 fire year is an extraordinary situation, and we recognize that you are charged with making a highly complex decision. However, we emphasize here that a federal policy of total fire suppression is unsustainable in the fire-adapted west, and that the national direction outlined in your August 2nd letter should not be permanent. Specifically, we ask that you reconsider this decision on a bi-monthly basis and commit to changing it when resource availability and weather conditions improve.

Collectively, this group represents many decades of experience in federal wildland fire leadership. As front line practitioners, we can attest to the tremendous value and benefit of using wildfire as a tool to help meet our land management objectives. Conditions are rapidly changing before our eyes due to climate change, fire suppression and the relentless pressure on federal/state agencies to put all fires out at all costs. We are here to help your efforts to refine federal fire policy if that is what is needed.

Having come directly from California, you have first-hand experience working and living in some of the most fire-dependent landscapes on the planet. Fire is a natural and essential element to healthy, resilient forests, and recent fire seasons have taught us that continuing to remove fire from these landscapes is not safe, ecologically-sound, or even possible. We also understand you have been inundated by social and political pressure to reverse course on proven successful fire policy of allowing some wildfires to be managed for protection, natural and cultural resource objectives. These are shortsighted political pressures that mislead the public and go against the very grain of what we know about the beneficial use of fire on the landscape.

The value of resource objective wildfires has been confirmed countless times through scientific research. An extensive body of research shows that these wildfires generally burn within the natural range of variation¹ and create heterogeneous landscapes that are more resilient to high severity wildfire². In Yosemite National Park, a successful 50-year fire restoration program in the Illilouette Basin has been shown to increase forest resilience and heterogeneity³, while also increasing

¹ Meyer, Marc D. 2015. Forest Fire Severity Patterns of Resource Objective Wildfires in the Southern Sierra Nevada. *Journal of Forestry* 113(1): 49-56. <http://www.ingentaconnect.com/content/saf/jof/2015/00000113/00000001/art00008>

² Koontz, M.J., North, M.P., Werner, C.M., Fick, S.E., and A.M. Latimer. 2020. Local forest structure variability increases resilience to wildfire in dry western U.S. coniferous forests. *Ecology Letters* doi: 10.1111/ele.13447.

³ Boisramé, Gabrielle; Thompson, Sally; Collins, Brandon; Stephens, Scott. 2017. Managed wildfire effects on forest resilience and water in the Sierra Nevada. *Ecosystems*. 20(4): 717-732. <https://doi.org/10.1007/s10021-016-0048-1>.

downstream water availability and reducing water stress to forests⁴. Research also shows that mechanical treatments are not feasible across broad portions of the landscape due to steep terrain and other limitations⁵, making prescribed fires and wildfires managed for resource objectives the only realistic tools available for fuel reduction in many settings. Between 2016 and 2020 approximately 238,540 acres of wildfire management met resource objectives inside areas with existing NEPA while significant benefits were also gained in wildland areas without plans on National Forest lands.

The necessity of managing wildfires for resource objectives has also been confirmed repeatedly in our practical experience as fire managers. For example, just this last month, fire managers on the Inyo National Forest were able to contain the [Dexter Fire](#), which was ignited by lightning several miles northeast of Mammoth Lakes, by utilizing the footprint of the [Springs Fire](#), which the forest had managed for resource benefits in 2019. Similarly, the 2020 Creek Fire – one of the most fast-moving and severe wildfires in California’s modern history – slowed significantly and moderated when it met the footprint of the [2018 Lions Fire](#) in the Ansel Adams Wilderness.

In recent years, the Forest Service has made enormous progress towards re-aligning agency policy to acknowledge fire’s natural role on our landscapes. Key actions and policies include:

- Region 5 Ecological Restoration Leadership Intent
- A management plan for Giant Sequoia National Monument that allows for and emphasizes wildfire use as an important strategy
- The 2012 Planning Rule emphasis on Ecological Integrity and wildfire use.
- The Forest Service as a co-author and key signatory to the Fire MOU Partnership
- Revised forest plans for the Lake Tahoe Basin Management Unit, Inyo, Sierra, and Sequoia National Forests that allow for wildfire to be managed for multiple resource benefits in appropriate locations and conditions.
- Significant investments in wildfire risk assessments, potential operational delineations, and other wildfire decision-making tools.

These policies are solid and have afforded us many opportunities for enhancing forest health that we otherwise would not have had. Cumulatively they represent hard-fought progress towards a policy environment that actually enables land managers to restore fire resilience to our landscapes rather than forcing them to exacerbate the problem through further fire suppression. Derailing this progress now due to political pressure is shortsighted and will ensure that the vast majority of wildfire acres burn during extreme conditions.

A more comprehensive outreach and education program is needed to help our communities and politicians better comprehend the broad scientific understanding of how our past practices of aggressive suppression response has harmed our public lands. Public land managers will respond to current science and to the will of the American public but they need accurate information to inform

⁴ Boisramé, G. F. S., Thompson, S. E., Tague, C., & S. L. Stephens. 2019. Restoring a natural fire regime alters the water balance of a Sierra Nevada catchment. *Water Resources Research*, 55. <https://doi.org/10.1029/2018WR024098>

⁵ North, M.P., A. Brough, J. Long, B. Collins, P. Bowden, D. Yasuda, J. Miller, and N. Sugihara. 2015. Constraints on mechanical treatment in the Sierra Nevada. *J. of Forestry* 113(1):40-48.

solid values and beliefs about public land management. Fire managers also need the support of states, municipalities, insurance companies, planners, developers, and others in order to re-establish healthy functioning watersheds in perpetuity. Our relentless persecution of wildfire only exacerbates a misguided view of public land management and fails to anticipate the severe consequences climate change can and will have on healthy landscapes.

We look forward to partnering with you to improve wildfire management in California and across the nation.

Sincerely,

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CC

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