



The Caldor Fire burned 221,835 acres within California's El Dorado National Forest between August and October, 2021. It was the largest wildfire in El Dorado history and only the second wildfire to cross the High Sierras from California into Nevada - the first being the 963,309 acre Dixie Fire which crossed on August 18, 2021 after wiping out historic Greenville, California, population 1,100, in 30 minutes. iStock by Getty Images

Our managed fire debate is now a political firestorm: Part 2:

JULY 23, 2024

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“An increasing percentage of the [Forest Service's] resources have been spent each year to provide for wildfire suppression, resulting in fewer resources available for other management activities such as restoration.

In 1995, wildland fire management funding made up 16 percent of the Forest Service’s annual spending, compared to 57 percent in 2018. Along with a shift in funding there has been a corresponding shift in staff from non-fire to fire programs, with a 39 percent reduction in all non-fire personnel since 1995.”

Federal Register, Vol. 84, No. 114, Thursday, July 13, 2019/proposed rules

It has been more than three years since we first interviewed Chris Dunn, the former Forest Service hotshot crew boss and now an Oregon State University forest scientist whose research is focused on where, when and how managed fire could be used safely.

What you are reading here is an update of that interview that includes some useful suggestions from a friend and Forest Service retiree who is well respected for his work with western counties and the forest planning guidance he offers to Forest Supervisory staffs that ask for his help, especially as it concerns Environmental Impact Statements [EIS's] and Environmental Assessments [EA's].

Chris Dunn has come a long way since his hotshot days on fire lines. He completed his PhD at Oregon State in 2015 and is now a post-doctoral researcher in OSU's Department of Forest Engineering, Resources and Management.

His doctoral dissertation is titled *“Mixed-Severity Fire Effects on Biological Legacies and Vegetation Response in Pseudotsuga Forests of Western Oregon’s Central Cascades, USA.”*

I'll spare you the agony. *Pseudotsuga* is the genus for Douglas-fir, the most common evergreen tree growing in western Oregon, Washington and British Columbia. Its range is so vast and dominant that it is its own monoculture.

We first tracked Dunn down on the recommendation of Paul Hessburg, a PhD landscape research ecologist we know and respect. Paul retired from the Forest Service a few years ago and now teaches periodically in the forestry graduate school at the University of Washington in Seattle.

He made quite a name for himself with his award winning *Era of Megafires* film and presentation. Produced by North Forty Films, Wenatchee, Washington, the 70 minute program was funded by several public and private sources.

We've seen the film twice and think it's quite good, though it suffers a bit from Paul's very principled view that he could not "take sides" in the wildfire debate while still employed by the Forest Service.

Paul played to a packed house in Sandpoint, Idaho several years ago. Dozens of homeowners had "what should we do" questions that no one present - including state forestry representatives - were prepared to answer. Thankfully, the list of available resources has since grown substantially since then.

Hessburg and Dunn are prolific researchers and writers whose focus on the role wildfire is playing in the West's changing forest landscapes has placed them at the epicenter of the megafire/managed fire debate - a once civil discourse that is now burning out of control because it has been sucked into the vortex of the climate change debate.

In hopes of advancing its own non-political perspective, the well-respected National Association of Forest Service Retirees [NAFSR] recently published a comprehensive science-based explanation titled *Managing Wildland Fire Including the Concept of "Managed Fire."*

Enter a political firestorm.

Dunn's take home message from our first interview was that there aren't many places in western forests where a *wildfire* can be safely managed. The downside risks to already stressed forests, watersheds, threatened and endangered fish, wildlife, plants, communities and people are too great.

Note that I have italicized the word *wildfire* in the preceding paragraph. Managed *fires* are not in the Forest Service's lexicon, which is why the NAFSR paper is titled "Managed Wildland Fire..." and not "Managed Fire..."

The Forest Service has not helped itself in its reluctance to explain or clarify terminologies that are easily corrupted for political purposes.

Managed *wildfires* begin with the decision by the Forest Service to allow a lightning strike to burn for what the agency terms "resource benefit." A nod to the fact that not all forest fires are bad.

Incident Commanders on fire lines are not permitted to unilaterally decide to allow such fires to burn for *any* reason. Their job is to direct the effort to put out the fire as quickly as possible – a politicized task that has become increasingly difficult as the size, frequency and intensity of western wildfires has increased.

The decision to allow a wildfire to burn should only be made by a line officer who is much further up the food chain than are Incident Commanders. What is missing from the decision space is common sense – a clear-eyed assessment of the risks associated with allowing a wildfire to burn for resource benefit.

What Chris Dunn and others are attempting to do is define when, where, why and how a wildland fire can be managed – in other words allowed to burn for resource benefit. This question runs headlong into objections from savvy foresters and Forest Service retirees who often remind us that managing a *forest* is much cheaper and less risky than managing a *wildfire*.

Then there are the avoidable natural resource losses: Trees, fish, wildlife, plant and bird habitat, recreation areas and watersheds. Intrinsic cultural, historic and ecological values that

are sacrificed for “resource benefit. “

Where do we draw the line? The damage many of these wildfires do is so great that a natural recovery can take more than one hundred years! Is this necessary when we have many science-based options that feature more rapid response times?

I think [1] the Forest Service needs to publicly clarify what managed *wildfire* means and what it doesn't mean and [2] what resource benefits will accrue to lands where managed wildfires are allowed to burn until there is nothing left to burn or rain and snow extinguish the embers. Fires that burn their way into tree roots have been known to burst into flames the following spring. Not good.

There needs to be an internal review process that establishes unambiguous and clearly stated guidelines for determining when, where, why and how a wildland fire can be safely managed *for resource benefit*.

There is only one person in the U.S. Forest Service who should make the decision to manage a wildfire *for resource benefit*: The Chief. His or her decision should be made in writing – one for each of the agency's nine regions - in early spring before wildfire season begins in earnest.

The decision should stand until the Chief sees a good reason to modify the order based on deteriorating or improving conditions in a particular region or regions.

The documentation that accompanies this decision should be available for public inspection. There is no other way to quiet critics and skeptics who believe – with some justification – that the decision to manage a wildfire is an impulsive choice made by an Incident Commander or inexperienced line officer.

No matter the decision the Chief makes, there will be wildfires that get away from fire fighting crews. Do we take managed wildfire out of the toolbox because the attempt failed? Or do we bear down on training and execution?

I'd opt for the latter because training and execution are critical components in every wildfire fighting effort, including full suppression. This is why post-fire internal reviews and unambiguous guidelines from the Chief are essential.

Every decision to manage a wildfire must be accompanied by a Chief's level review that answers these questions:

- . Was it the right decision?

- Was everything possible done to protect lives, homes and communities?

- What additional training is needed to improve execution?

Managing a wildfire for resource benefit bears *no resemblance* to purposefully set backfires or prescribed burns. Back-firing is designed to slow or stop an advancing wildfire. It has a long and successful history - as do prescribed burns that are set to dispose of woody debris and logging slash.

Yes, l-o-g-g-i-n-g slash. Managed wildfire should not be seen as a substitute for doing the carefully planned thinning and stand tending work necessary to reduce the increasing risk of catastrophic wildfire in forests that hold too many trees for the natural carrying capacity of the land.

Many argue that catastrophic wildfires are the result of climate change. Therefore, we should stand aside while nature resets the biological clock.

Will most Americans accept this rationale? I doubt it. Most want wildfires in forests they love extinguished as quickly as possible.

Our climate is changing, but I disagree with the attempt to connect climate change to the increasing size, frequency and intensity of our wildfires – a problem that was festering long before climate change became its own lightning rod.

What we are currently facing is a direct result of congressional and agency failure to find a way to continue managing forest growth and mortality *after* the federal government listed the northern spotted owl as a threatened species in June 1990.

In the aftermath, agency budget priorities shifted from managing forest density and forest health to building a larger and larger fire department that hasn't had much luck dealing with the size, frequency and severity of the marquee wildfires we see in the West every summer.

For 2021, think California's Paradise, August Complex and Dixie wildfires.

NICC 2021

National Interagency Fire Report for 2021

NICC 2021.pdf • 4 MB



For 2022, think Hermits Peak in New Mexico and Alaska's Lime Complex.

2022 NICC report

National Interagency Fire Report for 2022

2022 NICC report.pdf • 4 MB



For 2023, think the Smith River Complex and York, both in California.

NICC 2023

National Interagency Fire Report for 2023

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The multi-agency National Interagency Fire Center, based in Boise, Idaho is the keeper of all national wildfire statistics. It reports that as of today - July 22 - some 3,447,182 acres have been scorched including 1,125,770 acres in what it calls "large fires." [A large fire is defined as one that has burned more than 100,00 acres].

What we are witnessing is the downstream result of 25 years of shifting Forest Service budget priorities discussed in NAFSR's 2019 *Workforce Capacity Study*.

072619 Workforce Capacity Study

Forest Service Retirees study

072619 Workforce Capacity Study.pdf • 2 MB



The Forest Service is currently between 8,000 and 12,000 specialists short on the forestry side: engineers, silviculturists, biologists, botanists and technicians. It has hired about 4,000 over the last two years per Infrastructure funding and law, but many of the most needed field positions were not filled. Worse is the exceptionally high attrition rate caused by low morale and poor pay.

Rebuilding system-wide capacity is proving to be a big challenge. Hiring, training and deploying new people will take years. Meantime, there are fewer people in the Forest Service who know how to execute a planned fire for resource benefit.

This is unfortunate. Fire can be an extremely useful forest management tool in the hands of people who know what they are doing. But in the hands of people who lack experience it can quickly turn into a nightmare. And has.

What to do? If the decision were mine, I would use federal contracting authority to hire Forest Service retirees and others who know how to do what needs doing and I would pair them with the next generation of wildfire experts. in training.

I would also give firefighters a *big* pay raise. Youngsters make more money flipping hamburgers than firefighters earn while risking their lives.

NAFSR deserves credit for taking on the managed wildfire debate, but they buried their best thinking in the weeds on the last page of their report. Yes, the wildfire decision space needs to be widened, not narrowed.

The federal forestry window through which we should be managing forest growth and insect and disease infestations has been closing since the spotted owl listing in 1990 - through six presidential administrations: Bush 1, Clinton, Bush 2, Obama, Trump and Biden.

Congress has held hearings and done reports ad nauseum in hopes of identifying productive pathways forward, but we still have not seen a serious attempt to deal with the underlying ecological causes of the West's wildfire pandemic.

Most of you know the reasons why as well as we know them:

[1] A public that does not understand forestry and remains deeply suspicious of the motives of loggers and lumbermen.

[2] Anti-forestry activists who have done a masterful job of capitalizing on public and congressional fears.

[3] Layers and layers of conflicting federal rules and regulations that have made it increasingly difficult for the Forest Service and the Bureau of Land Management to develop landscape scale projects that call for thinning and prescribed burning to reduce the risk on uncontrollable wildfire.

[4] Lawyers representing organizations like the Sierra Club that have blocked many Forest Service attempts to thin dense and dying forests that will inevitably burn in killing wildfires.

The Supreme Court's June 28 ruling in *Loper Bright Enterprises v Raimondo* overturned *Chevron v Natural Resources Defense Council*, a 1984 ruling in which the Justices sided with NRDC, establishing the "Chevron Doctrine" requiring lower courts to defer to permissible agency interpretations of statutes the agencies administered – even when the reviewing court read the statute differently.

The result has been 40 years of federal rulemaking and procedural tinkering that violate the 1946 Administrative Procedures Act, which stipulated that such authority belongs to Congress and not un-elected bureaucrats.

NAFSR's many studies provide important cause-and-effect insight into the nation's wildfire pandemic. Many other organizations, including the National Wildfire Institute, established by the late Bruce Courtright, also did impressive research. Bruce was a Forest Service retiree and colleague for many years.

Nick Smith's *Healthy Forests, Healthy Communities*, Bob Zybach's *Northwest Maps* and Michael Rains *Call to Action* have also done impressive work. For our part, we have been writing about the wide ranging impacts of the West's wildfire pandemic for almost 40 years. Not much progress yet.

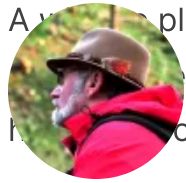
The Forest Service must move past what our colleague, Frank Carroll, calls "blowtorch forestry," the agency's love affair with what it calls "managed fire" or "managed wildfire." Call it what you like. It is killing us.

Blowtorch forestry is a product of Forest Service and BLM leadership reluctance to anger the anti-forestry mob or its House and Senate supporters or unelected bureaucrats at the Council of Environmental Quality, the departments of Agriculture and Interior and the West Wing of the White House.

Meantime, millions of Americans living and working in the rural West face increasingly significant risks to their health and safety. Wildfires have killed hundreds but carcinogenic wildfire smoke has killed thousands.



AUTHOR



Jim Petersen

A young plunger in Portola, California, July 22, 2024. A logger working less than five miles from the fire had to haul his equipment to the fire to help extinguish it. The Forest Service told Jim Petersen is a co-founder of the *Forest Foundation*. He is still waiting. Blowtorch forestry? *Nadine Bailey photo*

Jim Petersen is a co-founder of the *Forest Foundation*, the publisher of *Evergreen*, the Foundation's periodic journal.

This arrogant disregard for forests and people must stop NOW!

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