
Final Report

on

Fire Management Policy

May 5, 1989



REPORT ON FIRE MANAGEMENT POLICY

Table of Contents

Summary	i
Background	1
Establishment of the National Fire Management Policy Review Team	2
Concerns and Views	3
Policy Options	4
Federal Fire Policies	4
History and Experience with Natural Fire Programs	5
Findings	8
Recommendations	12
Issues Needing Further Analysis	16
Appendix	17

SUMMARY

The Fire Management Policy Review Team was established on September 28, 1988 to review national policies and their application for fire management in national parks and wilderness and to recommend actions to address the problems experienced during the 1988 fire season. The Team draft report was submitted to the Secretaries of the Interior and Agriculture on December 15, 1988. A 60 day public review and comment period, incorporating a series of public hearings, began with publication of that report in the Federal Register on December 20, 1988. Having reviewed and considered the public comments, this final report is submitted in culmination of the Team's charter.

The Fire Management Policy Review Team finds that:

- The objectives of prescribed natural fire programs in national parks and wildernesses are sound, but the policies need to be refined, strengthened, and reaffirmed. These policies permit fires to burn under predetermined conditions.
- Many current fire management plans do not meet current policies; the prescriptions in them are inadequate; and decision-making needs to be tightened.
- There are risks inherent in managing wildland fires. These risks can be reduced by careful planning and preparation. Use of planned burning and other efforts to reduce hazard fuels near high value structures and to create fuel breaks along boundaries help to reduce risks from both prescribed natural fires and wildfires.
- The ecological effects of prescribed natural fire support resource objectives in parks and wilderness, but in some cases the social and economic effects may be unacceptable. Prescribed natural fires may affect permitted uses of parks and wilderness, such as recreation, and impact outside areas through such phenomena as smoke and stream sedimentation.
- Dissemination of information before and during prescribed natural fires needs to be improved. There needs to be greater public participation in the development of fire management plans.
- Internal management processes, such as training more personnel, developing uniform terminology, and utilizing similar budget structures, would significantly improve fire management.
- Claims were heard that some managers support "naturalness" above all else, allowing fires to burn outside of prescription requirements without appropriate suppression actions.

The Team recommends that:

- Prescribed natural fire policies in the agencies be reaffirmed and strengthened.
- Fire management plans be reviewed to assure that current policy requirements are met and expanded to include interagency planning, stronger prescriptions, and additional decision criteria.
- Line officers certify daily that adequate resources are available to ensure that prescribed fires will remain within prescription, given reasonably foreseeable weather conditions and fire behavior.

FINAL REPORT OF THE FIRE MANAGEMENT POLICY REVIEW TEAM

May 5, 1989

BACKGROUND

The 1988 fire season was severe in many parts of the western United States. Near record acreages were burned over, and more than one-half billion dollars were expended on suppression efforts. Additional resources will be required for rehabilitation and other follow-up needs.

Although the western United States experienced wildland fires exceeding recent history, the extraordinary fire situation in 1988 in the Greater Yellowstone Area was the focal point for public concern and agency criticism. Yellowstone National Park enjoys a special place in the hearts of Americans and, indeed, people worldwide. Vivid accounts of the Yellowstone fires appeared daily on television and in the newspapers from July through September. Visitor use was interrupted; smoke episodes disturbed local communities; and some summer businesses were hurt. A total of 249 separate fires were counted during the summer in the Greater Yellowstone Area, burning over a million acres. Twenty-eight of the 249 fires began as prescribed natural fires as permitted under current Department of the Interior (USDI) and Department of Agriculture (USDA) policy. Controversy arose over the adequacy of fire suppression. We have to ask ourselves:

- Is the policy allowing fire to play its natural ecological role in parks and wilderness under certain conditions flawed or inappropriate? What are the alternatives, and what are their effects?
- Should more of the fires have been declared wildfires and suppressed earlier, particularly given the drought? Should early suppression action have been more vigorous?
- Are surrounding communities being put at risks unacceptable to them by natural prescribed fire programs or from policies that restrict fire suppression tactics? Or do management ignited prescribed fires and prescribed natural fires result in an appreciable net reduction in risks?
- Are offsite effects, such as smoke and air and water pollution, acceptable, and are they adequately assessed in planning for these programs? How do they compare to offsite effects to that which would occur without such programs?
- Is the public aware of the ramifications of current policy and alternatives, such as immediate suppression of all fires or letting all fires burn unchecked?
- Did Federal and State agencies spend too much money on suppressing the fires? Would they have spent less if prescribed natural fire programs had not been implemented or if there had been better public understanding of and support for natural fires?
- Are agencies perceived as incompetent when large, numerous fires occur that partially result from natural prescribed fire programs or from policies that restrict fire suppression tactics?
- To what extent has a long-term credibility and communication problem been created between the public and agencies, and, if so, how can it be corrected?

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the National Fire Protection Association, Paul Cunningham, Vice President of the Western Governors Association, Dr. Robert Lee of the University of Washington, and Dr. Ronald Wakimoto of the University of Montana were helpful in facilitating the supply of information about fire management policies and their applications from outside organizations and academia.

CONCERNS AND VIEWS

As stated in the Team's charter, "the objective of the review process is to determine the appropriate fire policies for national parks and wildernesses which addresses the concerns expressed by citizens and public officials about the management of fires on these lands as a result of the Yellowstone fire situation."

To gather information about those concerns, individual members of the team, assisted by representatives of the National Fire Protection Association, the Western Governors Association, and the academic community, met with or called a number of knowledgeable persons, including governors, local government officials, concessioners and outfitters, individuals with businesses in nearby communities, organizations with an interest in parks and wildernesses, academicians, and others. The Team also reviewed letters, summaries of correspondence, and many newspaper and journal articles related to fire management policy.

The concerns can be summarized as follows:

- Definition of prescribed fire conditions and limitations was inadequate.
- There was little opportunity for citizen participation in the development of fire management plans.
- The interdependence of park/wilderness and nearby communities was ignored in the implementation of fire management programs.
- Adequate communication and information before and during fires, whether wildfires or prescribed, was lacking.
- There appeared to be waste in the application of fire management policies, in natural resources that might have been utilized rather than burned, in the on- and off-site effects of fire on available recreation sites, wildlife habitat and forage, soil erosion, and damage to watershed, and in the costs of firefighting.
- An inadequate number of management ignited prescribed fires have been conducted to significantly reduce the amount of hazard fuels.
- There were unnecessary interagency conflicts.
- Authority for action in fire management needed to remain with line officials in the field, not centralized in Washington.

There are also concerns with strongly held conflicting views. The three principal areas are:

- the definition of "naturalness" and its application in driving fire management policy;

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These policies as applied to parks and wildernesses, implemented in 1968-85, allow for the prescribed use of fire, either by natural causes or management ignited, in support of land management objectives. The suppression of all wildfires is required, using economically efficient and environmentally compatible methods. All prescribed fires require pre-planning and decision criteria addressing expected fire behavior and effects.

Prescribed fires may be used to achieve agency land or resource management objectives defined in fire management plans. The following considerations are to be addressed in such plans: management objectives for the area, historic fire occurrence, natural role of fire, proposed degree of suppression, expected fire behavior, acceptable suppression techniques, adequate buffer zones, smoke management, and effects on adjacent land owners.

Prescribed fires are to be conducted only when the following conditions are met:

- They are conducted by qualified personnel under written prescriptions (prescribed fire plan).
- They are monitored to assure they remain within prescription.

Prescribed fires that exceed the limits of an approved fire plan will be reclassified as a wildfire. Once classified as a wildfire, the fire will be suppressed and can not be returned to prescribed fire status.

The important implications of these policies for parks and wilderness areas are:

- It allows managers to restore and maintain the natural role of fire on land when the land management objective is to perpetuate natural processes and values.
- Fire can be used as an important management tool to reduce fuel accumulation, control fire hazard around developments and along boundaries, and to meet other management needs.
- All fires are treated as wildfires, subject to appropriate suppression action, unless a plan is in place that describes the conditions under which prescribed fire will be allowed to burn. Both natural and management-caused ignitions are allowed.
- A prescribed fire must be declared a wildfire when it exceeds prescribed conditions.
- There is flexibility for fire management plans to address the unique characteristics and objectives of specific parks and wildernesses.

Fire management plans for national parks and wilderness areas are subject to National Environmental Policy Act (NEPA) compliance.

HISTORY AND EXPERIENCE WITH NATURAL FIRE PROGRAMS

Following prescribed burning experience in the Everglades in the 1950's, the National Park Service began to change its fire suppression and prescribed burning policies in 1968 to accept a more natural role of fire in park ecosystems. Lightning-caused fires were allowed to burn under specified conditions in Sequoia-Kings Canyon National Parks that year, followed by a similar program in another 7 parks between 1968 and 1972. In the decade that followed, another 26 parks began some parts of the prescribed fire program (Appendix, Table 1).

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The Bureau of Land Management uses prescribed fire extensively to meet resource and fire management objectives. However, the use is almost exclusively through planned management ignitions. Prescribed natural fire is generally not used due to the predominance of fuel types having a high rate of spread (i.e. grass and brush) commonly found on Bureau-administered lands. Those few fire management plans that identify prescribed natural fire as a management strategy do so for lands located adjacent to wilderness managed by other agencies. The operational plans for these prescribed natural fire areas were developed through coordinated fire planning efforts with the adjacent federal wilderness management agency.

The Bureau of Land Management issued its first policy for the management of lands designated as wilderness study areas in 1979. This policy, which addressed fire management practices, was revised in 1987. Fire management policy for designated wilderness areas was issued in 1981.

The Fish and Wildlife Service manages seventy designated wilderness areas containing approximately 19 million acres; 97 percent of this acreage is in national wildlife refuges located in Alaska. Fires on these refuge wilderness areas are dealt with under the provisions of the Alaska Interagency Fire Plans, which were prepared in cooperation with Federal and State agencies as well as Alaskan Native Corporations. The experience of the period 1982-1988 demonstrates that fires which occur within these wilderness areas have been adequately handled to meet the objectives outlined in these coordinated plans.

Although the Bureau of Indian Affairs has only one Federally designated wilderness area, several tribes have designated areas within their reservations as tribal wilderness. Management of these tribal wilderness areas are based on tribally developed or approved plans and, in most instances, follow closely that outlined in the Wilderness Act of 1964. Lightning-caused fires occurring within these designated areas may be allowed to burn provided they meet all requirements and constraints outlined in the area specific fire management plans. In addition, the use of management ignited prescribed fires to reduce natural fuel buildup has been widely practiced since the early 1940's. Records indicate that only one lightning-caused fire has occurred within the single Federally designated wilderness area on Indian lands, burning an area of approximately 350 acres. No attempt has been made, to date, to separate data on fires occurring on tribally designated wilderness areas from other fires occurring within reservation boundaries.

Results in National Parks:

Since the beginning of these programs in 1968 until 1987, more than 1600 lightning-caused fires have been permitted to burn more than 320,000 acres of national park land. Only one serious problem had developed--the Ouzel Fire on the Rocky Mountain National Park which threatened the adjacent community of Allens Park, Colorado. At the same time, more than 1400 prescribed burns were ignited by the park staff in 46 national park areas that covered more than 325,000 acres. The burns were designed mainly to manage vegetation by simulating the natural role of fire in reducing fuel accumulations in order to modify plant succession and to help maintain ecosystem processes. Some of the benchmark fire management programs in national parks are those found in Sequoia-Kings Canyon and Yosemite National Parks in the Sierra Nevada, the Everglades National Park in Florida and Yellowstone and Grand Teton National Parks in the Rockies.

Results in National Forest wilderness:

Since 1972 when the USDA Forest Service began permitting lightning-caused fires to play a more natural role in wilderness, 503 prescribed natural fires have burned nearly 210,000 acres within wilderness areas in the Northern and Intermountain Regions, the Forest Service Regions having the most active prescribed natural fire management programs. Of these fires, 23 became wildfires burning

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4. Some fire management prescriptions do not place adequate limits on fire management decisions.

- Some prescribed fires that were ultimately declared wildfires were interpreted to be within prescription until they reached an arbitrary limitation of a boundary of a park or wilderness boundary.
- Insufficient attention has been given to values at risk, both inside and outside parks and wilderness boundaries.
- There was insufficient consideration of the cumulative risks associated with multiple fires, large fires, or fires with especially active perimeters.
- Insufficient attention was given to the potential cost and damage associated with a prescribed fire later becoming a wildfire requiring suppression action.

✓ 5. Beyond being brought up to current standards, fire management programs would be strengthened by a combination of improved decision criteria in plans, additional fire expertise, and more direct line officer involvement.

- Critical decision points (e.g. decision trees) are often not identified in plans.
- Lack of resident fire expertise in some locations is critical.
- Lack of coordination of policy application for prescribed natural fire programs among and within agencies results in disparate treatment of fires and inconsistent decisions.
- Documentation of decisions is often lacking and does not demonstrate the involvement of some agency line officers.
- Some fire management plans do not include the latest technology.
- Plans are not complete in terms of indicators of long-term drought and impact on shared suppression resources.
- Variations in planning and decision processes result in decisions that appear illogical, create political and public concern for competence of the agencies, and render decisions to limit fire size ineffective.
- Prescribed natural fire programs do not adequately consider the impact on other interagency programs and resources.

6. The severity of the 1988 fire season in some areas of the West (the most severe on record in the Greater Yellowstone Area) revealed the risks inherent in managing wildland fires. These risks can include high fire suppression costs as well as unacceptable social, environmental and economic impacts, and natural resource losses. The extraordinary weather conditions of last summer resulted in fire behavior that limited the effectiveness of fire suppression decisions and actions, and at times put managers in the position of being responsible for situations beyond their control. Recognition of the fire weather situation and trends, in some cases, was hampered by the departure of fire management plans from policy by not including prescriptions which would have provided managers a better basis for recognizing the severity of the situation.

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- There is a great diversity of views within and outside agencies regarding the basis and the primary objectives of prescribed natural fire programs.
- Adequate public involvement may not have occurred in the development of some prescribed natural fire management plans and the public may not have fully understood the risks inherent in prescribed natural fire management.
- The primary message communicated by agencies continued to be the biological value of prescribed natural fire to vegetation and wildlife even after the fires had been declared to be wildfires.
- There was a lack of uniform, consistent, adequate information on the location of the fires, planned fire management actions, and their implications for the public in terms of road closures, smoke, and other effects on local populations and visitors.

12. Budget structure and funding in the Departments of Agriculture and Interior create the following effects:

- The level of expertise and professionalism needed for the broad spectrum of fire management and use program may not be available to support management objectives in all agencies.
- Dissimilarities between the two departments in the ways in which programs are funded and differences in agencies' terminology inhibit the ability to cooperate and coordinate in prescribed fire programs on mutual boundaries.
- These also cause disparate treatment of naturally occurring fires in determining whether they are designated as prescribed fires or wildfires. Forest Service and Bureau of Land Management policies require that prescribed fires be managed with appropriated funds from the benefiting program. The National Park Service manages prescribed natural fires with emergency funds.
- Hazard fuel reduction programs have not been adequately funded in some cases.
- Very limited appropriated funds are allocated to develop expertise and apply prescribed fire in parks and wildernesses.
- There is an inadequate number of professionals in Federal agencies in fire management programs. Fire management planning and application is a collateral duty at some major parks.
- Agency budgets for presuppression activities have declined in real dollars in recent years.
- National Park Service is completing an analysis of normal fire year operations, FIREPRO III, in order to define essential minimum wildland fire program needs.

13. Lack of clear definition and inconsistent implementation of "light hand on the land" suppression tactics raise serious questions over the management of fires in 1988.

- The public, employees, and cooperators became confused by mixed messages about the intensity of suppression efforts and the objectives to be achieved.
- Incident commanders received unclear direction about the use of certain suppression tactics, which were sometimes in conflict with the selected suppression alternative.

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4. Current fire management plans must be strengthened by:
 - a. Developing joint agency fire management plans, agreements, or addendums to existing plans for those areas where fires could cross administrative boundaries. Periodic joint review of these plans should occur. These will include agreement on processes and criteria to be used to make decisions on prescribed vs. wildfire and suppression strategies and tactics.
 - b. Including a comprehensive set of criteria which will be used in deciding whether or not to allow natural ignitions to burn as prescribed fires. In addition to those criteria currently required and commonly used, the following factors will be considered:
 - (1) Energy release component.
 - (2) 1000-hour fuel or duff moisture content.
 - (3) Appropriate consideration of the national and regional fire situation, including the numbers of fires and amount of available resources to suppress them.
 - (4) Limits on numbers of fires burning in the planning unit at one time.
 - (5) Limits on projected length of active perimeter and acreage burned.
 - (6) Indicators of cumulative drought effects on fire behavior.
 - (7) Potential impacts upon visitors, users, and local communities, both on and off site.
 - c. Clearly describing the decision process and factors to be addressed before a fire is declared a prescribed natural fire.
 - d. Including criteria to be used in declaring a prescribed fire a wildfire. There must be interagency agreement on these factors in areas where fire may move across administrative boundaries and shared suppression resources may be required.
 - e. Clearly identifying areas that need protection from fire, such as developments within or adjacent to wilderness and park boundaries. Fire management plans should also include actions that are to be taken, such as hazard fuel reduction or installing fuel breaks, to protect such developments or areas.
 - f. Clearly stating the management objectives being addressed by the prescribed natural fire program, including identification of specific values gained as a result of allowing natural fires to burn unsuppressed within prescribed conditions and areas.
 - g. Clearly describing the process to be used to ensure adequate public involvement and coordination with local governments in both plan development and implementation.
5. Agencies will cooperatively develop regional and national contingency plans and procedures and provide the appropriate program monitoring and direction, including curtailment of prescribed fire activities when necessary because of competition for national and regional fire suppression resources.

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10. Agencies will ensure NEPA compliance for fire management plans. Agencies will increase opportunities for public involvement and coordination with state and local government when revising or developing fire management plans.

11. Interpretation and public information before and during fires will be improved.

- a. Agencies will ensure that timely, accurate, and consistent information is provided for the public on the purpose, presence, and status of prescribed natural fires, as well as impacts on the community due to closed roads, trails, smoke, back country restrictions, and other effects.
- b. Interpretive and fire status messages are for different purposes, and agencies should strive to keep them separate and distinct. There should also be a distinction between the information needs for prescribed fires and wildfires.
- c. Agencies should ensure that the public is informed of the risks involved in fire management programs.
- d. Agencies will use common terminology for prescribed natural fire programs.

12. USDI and USDA will review the methods of funding prescribed fire and fire protection programs with the objective of improving interagency program effectiveness. Planning and presuppression activities should be financed by program funds rather than through emergency fund transfers and supplementals.

13. There is a need for additional research related to fire management programs.

- a. USDI and USDA will develop coordinated research programs utilizing the unique capabilities of both organizations.
- b. The feasibility of prescribed burning forests using stand replacement fire will be investigated and tested by implementing an appropriate interagency field research program.
- c. Research will be increased to improve the ability to predict severe fire behavior, conduct long-term weather forecasting, and identify past abnormal events.
- d. Efforts will be undertaken to develop and implement an expert system that integrates a wide array of fuel, topographic, weather, climatological, fire behavior, post-fire effects, and other information and readily displays such information in an interactive mode for the user at a computer terminal. This expert system would help to assure that important variables are not overlooked as decisions are made regarding long duration fires.
- e. Efforts will also be undertaken to develop comprehensive data bases for park and wilderness resources and provide for state of the art analyses and display as well as an efficient, continuous monitoring system to insure timely update of information.
- f. Development of additional emission factors for wildland fuels and better methods for projecting air quality impacts of prescribed and wildfires are needed, since smoke and air pollution are major considerations in deciding when to terminate prescribed natural fires and in scheduling management ignited prescribed fires.

APPENDIX - Historical Data of Prescribed Fire Programs of the USFS and NPS.

TABLE 1. PRESCRIBED FIRE OCCURRENCE THE NATIONAL PARKS SERVICE 1968-1988
(data obtained from NPS Wildland Fire Management Computer System, 1988)

NPS Units by Region	Area Size Acres	PRESCRIBED FIRE		Management Ignitions: No. Acres:
		Lightning Ignitions No. Acres		
<u>Alaska Region</u>				
Bering Land Bridge	2,784,960	6	452	
Denali	6,028,091	23	44,110	
Gates of the Arctic	8,472,517	23	8,560	
Noatak	6,574,481	13	28,961	
Wrangell-St. Elias	13,188,325	7	134	
Yukon-Charley Rivers	2,523,509	13	44,778	
<u>Mid-Atlantic Region</u>				
Delaware Water Gap	66,637			2 11
<u>Midwest Region</u>				
Fort Larned	718			20 572
George Washington Carver	210			14 66
Herbert Hoover	187			7 50
Homestead	195			20 327
Indiana Dunes	13,815			8 333
Isle Royale	571,790	6	1	
Ozark	80,788			69 889
Pipestone	282			25 708
Scotts Bluff	2,997			6 1,871
<u>National Capital Region</u>				
George Washington Memorial Parkway	7,131			2 1
Rock Creek	1,754			5 1
<u>North Atlantic Region</u>				
Cape Cod	43,556			8 3
<u>Pacific Northwest Region</u>				
Crater Lake	183,224	44	682	21 5,402
John Day Fossil Beds	14,014			3 15
North Cascades	504,781	58	231	
Olympic	921,935	3	179	
San Juan Island	1,752			3 1
Whitman Mission	98			6 105

PRESCRIBED FIRE

Parks and Monuments
by Region

Western Region

	Area Size Acres		Lightning Ignitions No. Acres	Managemen Ignition No. Acre	
Golden Gate	73,117			6	17
Grand Canyon	1,218,375	81	3,723	19	3,148
Joshua Tree	559,954	4	20	3	12
Lassen Volcanic	106,372	18	9		
Lava Beds	46,560	3	32	4	461
Pinnacles	16,265	8	1,993	86	7,861
Point Reyes	71,046	12	653	57	2,504
Redwood	110,178	2	2	6	138
Saguaro	83,574	36	42	3	108
Santa Monica Mountains	150,000			3	108
Sequoia and Kings Canyon	863,683	384	32,518	48	8,247
Whiskeytown	42,503			8	99
Yosemite	761,170	333	34,998	75	26,802
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Totals	1,921	391,538	1,131	334,931	

Fire Management Review Team

May 5, 1989

Department of Agriculture

Department of the Interior

Memorandum

**To: Secretary of Agriculture
Secretary of the Interior**

**Through: Deputy Secretary, Department of Agriculture
Under Secretary, Department of the Interior**

From: Fire Management Policy Review Team

**Subject: Final Report Concerning Fire Management Policy
for National Parks and Wilderness Areas**

We are submitting our final report in accordance with the direction and schedule laid out by your predecessors. The Team's earlier report has undergone public review. The Team has reviewed the public comments and made some revisions in its report.

Both the Team's final report and the summary of public comments are attached. The Team feels that those reviewing and implementing its recommendations should also be aware of the range of public concerns reflected in the summary. Although the overwhelming majority of public comments were incorporated in or favorable to the Team's recommendations, other viewpoints are valuable in defining options and placing implementation actions in perspective.

Our recommendations include a number of significant changes in fire policy and its application to national parks and wilderness areas. While recognizing the important role of fire in natural ecosystems, we believe that these suggested improvements in fire management policy will reduce the risk of repeating the experience of the summer of 1988.

Implementation of the recommendations in this report should be assigned to and rest with line managers in the agencies involved in this effort, with coordination through established interagency fire coordinating groups. Both line managers and these interagency groups can ensure that prescribed fire policies and actions are logically integrated with the missions of the individual agencies and Federal lands, and the full range of suppression actions for wildfires.

The Team was established to review current U.S. Department of Agriculture and U.S. Department of the Interior policies on fire management in light of the extreme fire situation experienced in the Greater Yellowstone Area during the summer of 1988. The Team conducted a thorough review of fire policies for national parks and

FINAL REPORT OF THE FIRE MANAGEMENT POLICY REVIEW TEAM

May 5, 1989

RECOMMENDATIONS

The Team recommends that the Secretaries of Agriculture and the Interior implement the following policy and direction:

1. Existing USDI and USDA fire management policies governing wilderness and parks must be strengthened and reaffirmed to limit their application to legitimate prescribed fire programs. Clarification is needed to prevent inappropriate use of fundamentally sound policies.
2. The agencies reaffirm their policies that fires are either prescribed fires or wildfires. The agencies reject as impractical and unprofessional the practice that fires can be allowed to burn free of prescriptions or appropriate suppression action.
3. USDA and USDI agencies will periodically review fire management plans for parks and wilderness for compliance with current policy, direction, and the additional requirements recommended by this report. No prescribed natural fires are to be allowed until fire management plans meet these standards.
4. Current fire management plans must be strengthened by:
 - a. Developing joint agency fire management plans, agreements, or addendums to existing plans for those areas where fires could cross administrative boundaries. Periodic joint review of these plans should occur. These will include agreement on processes and criteria to be used to make decisions on prescribed vs. wildfire and suppression strategies and tactics.
 - b. Including a comprehensive set of criteria which will be used in deciding whether or not to allow natural ignitions to burn as prescribed fires. In addition to those criteria currently required and commonly used, the following factors will be considered:
 - (1) Energy release component.
 - (2) 1000-hour fuel or duff moisture content.
 - (3) Appropriate consideration of the national and regional fire situation, including the numbers of fires and amount of available resources to suppress them.
 - (4) Limits on numbers of fires burning in the planning unit at one time.
 - (5) Limits on projected length of active perimeter and acreage burned.
 - (6) Indicators of cumulative drought effects on fire behavior.
 - (7) Potential impacts upon visitors, users, and local communities, both on and off site.

9. Additional interagency emphasis will be given to addressing opportunities for improving fire management programs.

- a. The National Wildfire Coordinating Group (NWCG) charter should be expanded specifically to include prescribed fire program coordination.
- b. The NWCG should take the lead in developing common terminology for prescribed burning programs and describing wildfire suppression alternatives.
- c. Agencies will develop joint criteria for selecting appropriate suppression tactics in wilderness and parks.
- d. Agencies will improve public and agency understanding and acceptance of using appropriate suppression tactics that meet fire management objectives and minimize the adverse impact on wilderness values and park resources.

10. Agencies will ensure NEPA compliance for fire management plans. Agencies will increase opportunities for public involvement and coordination with state and local government when revising or developing fire management plans.

11. Interpretation and public information before and during fires will be improved.

- a. Agencies will ensure that timely, accurate, and consistent information is provided for the public on the purpose, presence, and status of prescribed natural fires, as well as impacts on the community due to closed roads, trails, smoke, back country restrictions, and other effects.
- b. Interpretive and fire status messages are for different purposes, and agencies should strive to keep them separate and distinct. There should also be a distinction between the information needs for prescribed fires and wildfires.
- c. Agencies should ensure that the public is informed of the risks involved in fire management programs.
- d. Agencies will use common terminology for prescribed natural fire programs.

12. USDI and USDA will review the methods of funding prescribed fire and fire protection programs with the objective of improving interagency program effectiveness. Planning and presuppression activities should be financed by program funds rather than through emergency fund transfers and supplementals.

13. There is a need for additional research related to fire management programs.

- a. USDI and USDA will develop coordinated research programs utilizing the unique capabilities of both organizations.
- b. The feasibility of prescribed burning forests using stand replacement fire will be investigated and tested by implementing an appropriate interagency field research program.
- c. Research will be increased to improve the ability to predict severe fire behavior, conduct long-term weather forecasting, and identify past abnormal events.
- d. Efforts will be undertaken to develop and implement an expert system that integrates a wide array of fuel, topographic, weather, climatological, fire behavior, post-fire effects, and other information and readily displays such information in an interactive mode for the user at a computer terminal. This expert system would help to assure that important variables are not overlooked as decisions are made regarding long duration fires.



THE SECRETARY OF THE INTERIOR
WASHINGTON

JUN 1 1989

Memorandum

To: Assistant Secretary, Land Minerals Management
Assistant Secretary, Fish, Wildlife and Parks
Assistant Secretary, Indian Affairs
Assistant Secretary, Policy Budget and
Administration

From: Secretary *M. Mulloy*

Subject: Fire Management Policy

The policy recommendations of the Fire Management Policy Review Team are to be implemented as quickly as possible to ensure the appropriate role of fire in the ecologically sound stewardship of our National parks and federally-designated wilderness areas.

- o The Assistant Secretary--Land and Minerals Management is to take the lead in preparing appropriate changes in the Fire Management Sections of the Departmental Manual, drawing on the resources of the Interior Fire Coordinating Committee for staff assistance. The revision should be complete by October 1, 1989.
- o All Assistant Secretaries are to direct their bureaus to take the necessary actions to implement these recommendations. These include immediate action to ensure that:
 - All fires will be declared either prescribed fires or wildfires. The review team concluded that it is inappropriate to allow fires to burn free of prescriptions or appropriate suppression action.
 - The responsible line officer will certify in writing daily that prescribed natural fires are within prescription and that adequate resources are available to ensure that each prescribed fire will remain within prescription through the next 24 hours, given reasonably foreseeable weather conditions and fire behavior. If these conditions cannot be met, the fire shall be declared a wildfire and suppressed.
 - Fire management plans for parks and wilderness areas will be brought into compliance as soon as possible with the recommendations set out in the report. No prescribed

**SUMMARY OF PUBLIC COMMENTS
ON THE
FIRE MANAGEMENT POLICY REPORT**

April 1989

**United States Department of the Interior / National Park Service
United States Department of Agriculture / Forest Service**

INTRODUCTION

The Fire Management Policy Review Team was established in September 1988 to review national policies and their application for fire management in national parks and wilderness and to recommend actions to address the problems experienced during the 1988 fire season. The goal of the review team is to have improved fire management policies in effect by the end of May 1989.

The team's report was released for public review in mid-December 1988. Responses were received in the form of oral testimony at 11 public meetings held nationwide in February 1989 and letters submitted during the review period. The deadline for receipt of letters was February 21, 1989; however, all letters received by March 3 were coded and summarized. Responses totaled 408 and came from individuals, organizations, governmental entities, commercial firms, chambers of commerce, and academics in 39 states, the District of Columbia, and Canada. Appendix A lists the agencies, organizations, and businesses that responded; appendix B lists the public meeting sites and dates as well as the number of people who attended and who spoke.

SUMMARY METHODS

Working together, the National Park Service and the Forest Service coded and summarized the public comments during a two-week period in early March 1989. All written and oral comments were cataloged and stored using a computerized database management system; information on individuals and organizations that submitted comments was also entered into the system. (The number of comments was considerably larger than the number of responses because letters and oral responses generally contained comments on several subjects.) The comments were then reviewed and coded based on category and subject of comment and support for or opposition to the policy and the review team's recommendations. Specific suggestions were listed and coded at this time.

After the database was completed, similar comments were grouped using the database management system, and the grouped comments were summarized. The system was also used to help identify important concerns and issues, determine general opinion trends, compile specific comments and suggestions on the report and recommendations, and summarize information on individuals and organizations that submitted comments.

The coded comments were not quantified because this was not a voting exercise. Further, most comments contained caveats or qualifiers. For example, many people who indicated opposition to the policy were not totally against it; rather, they disagreed with a part or parts of the policy, or with its implementation, or with some other aspect. Similarly, many supporting comments included reservations ("I support the policy except for . . .") or favored the policy but found fault with the implementation.

A large number of people submitted specific comments and suggestions concerning the review team's report and recommendations. These comments and suggestions are included in appendix C.

SUMMARY RESULTS

Overview

Most people commenting on the fire management policy supported the review team's recommendations concerning the use of prescribed natural fires and planned ignitions under specified conditions, although a substantial number of comments stated that the criteria for prescribed burns are too stringent. Those opposed to the policy for prescribed burns generally felt that it does not adequately consider the risks to property and human safety. Commenters strongly supported the recommendations for increased interagency cooperation and coordination and more research, and many stressed the need for more and better public involvement; most people felt that the policy needed to be strengthened or modified concerning fire management plans, suppression methods and tactics, training, and costs and funding.

Many people expressed support for the use of more planned ignitions. A significant number were puzzled by what they considered to be the agencies' over-reliance on natural ignitions for prescribed fires. Many felt that timely man-caused ignitions might be a way of avoiding the yearly "boom or bust" situation in wildland fires. Some commenters encouraged agencies to allow unplanned human-caused ignitions to burn if they are otherwise within prescription.

A number of people who commented on the use of prescribed fire emphasized the need for defensible prescriptions and early public involvement. Many stated that fires should be closely monitored and controlled to avoid property damage and that the government should notify property owners in advance of prescribed burns.

Some people felt that we should consider alternatives to burning that better utilize our natural resources, such as logging. Several suggested using livestock to keep the fuels down, and some thought that mechanical treatments are appropriate.

A number of commenters expressed opposition to what they called the "let-burn" policy because, as one person put it, "it is as much a non-policy as it is a policy." These people said that the policy implies that the place, time, conditions, and methods of control have not been predetermined and suggests that man has no managerial responsibility and places theories first and concerns of the public, parks, and resources last.

Other comments included the following:

Prescribed natural fire is preferable to planned ignition.

Prescribed natural fire shouldn't be done under last year's conditions.

Prescribed natural fire should be used around developed areas in parks, but should be controlled and managed properly.

Prescribed natural fire is appropriate as long as consideration is given to fire behavior factors, topography, density and type, fuel moisture, weather conditions, source, 1,000-hour fuels, and regional drought indices.

Comments concerning fire in wilderness areas were generally in favor of using prescribed fire to restore the landscape mosaic and increase wildlife diversity. One person wrote that prescribed fire should be used in wilderness only to improve wildlife habitat; another was concerned with how fire fit with the concept of wilderness. One commenter stated that "federal agencies have a duty to preserve the wilderness character of designated areas and to use the least disruptive means available to carry out this task." The comment further indicated that if suppression of wildfires interferes with a fire-dependent ecosystem, then the Forest Service is in violation of a legal mandate to preserve the natural character of the wilderness.

Several comments stated that a "no management" concept has seriously degraded wilderness resources, and management plans should be developed. One commenter supported legislation that will "require control of fire, noxious weeds, insects and diseases where they pose a threat to adjacent multiple-use areas and private property on the wilderness area itself." Another person specifically stated that management plans should be in place before allowing nonprescribed fires to burn out.

One commenter supported planned ignitions in wilderness to reduce the fuel buildup and restore (fire-generated) heterogeneity, which influenced the size and shape of natural fires prior to 1900. Another felt that Forest Service policy for planned ignitions in wilderness is so stiff that "it is essentially impossible for such burns to be a part of wilderness."

Of those who disagreed with the "light hand on the land" concept, many felt that the policy needed to be reviewed or reconsidered. A number of people indicated that although this policy may be environmentally sound for large areas under government control, it is inappropriate where there is a mix of landownership or where substantial economic benefits are derived by local communities. The "light hand" approach was also seen as inappropriate for many large wildfires.

There were a number of objections to using political boundaries as fire breaks, as suggested in the recommendations, rather than biological boundaries. Suggestions included using roads, lakes, rivers, and topographic divides. One person felt that if we wait until a fire reaches a park or wilderness boundary before declaring it a wildfire, we may not have the opportunity to take successful suppression action. Another said that fire breaks along boundaries could become an obstacle to future additions to wilderness areas.

A large number of commenters expressed opposition to building roads into roadless areas for suppression of fires. One stated that under no circumstances should there be timbering or road building in wilderness. Some favored the use of heavy equipment as a suppression tactic, some opposed it.

Post-fire activity was recommended, that is, continuing efforts in monitoring and controlling earth movements, debris, flooding, and wildlife food loss. In regard to revegetation, one person felt that it is "entirely inappropriate"; others thought that minimal reseeding and replanting should be done, several specifying along roadways, near facilities, and in recreation areas and some recommending native grasses and trees.

Many of the comments about firefighting tactics dealt with the need for improved communications between managers and front-line officers. It was perceived that in Yellowstone last year there was a general lack of communication concerning suppression activities.

Training

Although some commenters commended firefighting personnel and their efforts, a great number of suggestions dealt with getting additional training for personnel at all levels, perhaps by the military. Some were specific, calling on the agencies to strengthen training of firefighters so that they recognize and react to extreme weather conditions and use proper suppression techniques. Some saw a need for specialized personnel such as hotshot crews; others favored the utilization of local personnel.

Interagency Cooperation

A recurring comment was a call for increased cooperation and coordination among federal and state agencies where fires could cross administrative boundaries. Saying "an individual park is not an isolated, pristine, ecological bubble," one respondent echoed the thoughts of many by emphasizing the need for interagency coordination, cooperation, and communication. These comments were made in reference to the 1988 fires as well as to developing fire management plans. Many stressed the importance of including state and local fire agencies and state wildlife agencies in planning. A few commenters stated that a "unified" federal policy is essential to fire management; some went even further to suggest that there be one federal fire management agency.

Public Information and Involvement

Many commenters stressed the need to strengthen public information and involvement. There was also a general feeling that public information programs should include education aimed at improving awareness of fire management as an ecological tool.

A number of commenters discussed the manner in which fires are being paid for. Recommendations included not using firefighting funds for unplanned ignitions and not using timber and mineral receipts for future fire costs. There were equal numbers of comments for and against using Knutsen-Vandenberg funds from the timber program. One person stated that planning and presuppression activities should be financed by program funds rather than emergency fund transfers and supplements.

Research

The team's recommendations regarding more research received numerous positive responses, with people calling for increased research and development of advanced technology for predicting, fighting, and monitoring fires. Specifically, many commenters felt that the dynamics of stand replacement fires were poorly understood and needed increased research emphasis. Others felt that increased research on fire dynamics must be coupled with more study of fire effects on vegetation and wildlife. One person was less confident regarding the utility of additional research, stating that he had "grave concerns with assumptions that man can ever manage wildland fire, simulating a natural process we have not nearly begun to understand."

Some people advocated additional research on fuel and weather, fire behavior, exploration and use of new and different firefighting techniques (including those that do not involve heavy intrusion and costly intervention), analysis of forest types, fire history and occurrence in times of drought, and the use of geographical barriers as fire breaks.

Greater Yellowstone Area

Almost all of the commenters expressed opinions on the Yellowstone fires and how they were managed. These comments have been consolidated and summarized for reference in evaluating fire policy and the review team's recommendations.

Concerning fire suppression activities, many people commended Yellowstone's firefighters and management for doing a good job and taking proper action, particularly in saving historic structures. However, there were also many negative comments, which centered on faulty objectives; a lack of communication at all levels; a lack of a clear chain of command, especially interagency; and a reluctance of some individuals to apply full suppression tactics. An alternate view on the last point was that political pressure replaced logic at the management level by demanding full suppression. One person suggested that it would have helped if Yellowstone had had a prescribed burning program. Two comments indicated that the Forest Service should have used local resources and knowledge more effectively; although good commanders were seen at the unified area command, it was felt that NPS management should also have been included. The military was described as ineffective because crews and aircraft were not assigned to individual fires. Endangerment to firefighters' lives was criticized, as was the lack of ability to control fires of this magnitude, particularly by the methods used.

Several commenters expressed concern about the firefighting tactics. Some thought suppression efforts should have begun earlier, particularly given the extreme weather conditions, the difficult topography, and heavy fuel loads. Several people commented that damage to soils and vegetation was far worse from suppression than from the fires. A number were concerned that air pollution caused by the fires exceeded federal air pollution requirements, causing severe respiratory ailments and adversely affecting crops and livestock.

There were split views on the relationships and responsibilities of federal land managers and nearby landowners and residents. A large number of commenters felt that, in general, fire management officials in the greater Yellowstone area demonstrated a complete disregard for the health, safety, and livelihood of those in the surrounding communities and that homes and businesses should have been protected. Some felt that commercial operators should have had preference in sustaining their livelihood; a number supported compensation to concessioners, agriculturalists, timber companies,

APPENDIX A: COMMENTS RECEIVED

Written and oral comments were received from the following government agencies, organizations, and businesses.

Congressional

Subcommittee on National Parks and Public Lands
Senator Steven Symms
Senator Malcolm Wallop
Senator Alan Simpson

International

Canadian Embassy

Federal Agencies

United States Department of the Interior
Bureau of Land Management
Bureau of Indian Affairs
National Park Service
Arkansas Post National Memorial
Bandelier National Monument
Big Thicket National Preserve
Big Bend National Park
Buffalo National River
Chickasaw National Recreation Area
Curecanti National Recreation Area
Guadalupe Mountains National Park
Hot Springs National Park
Indiana Dunes National Lakeshore
Jean Lafitte National Historical Park and Preserve
Lassen Volcanic National Park
Lyndon B. Johnson National Historical Park
Sequoia/Kings Canyon National Parks
Southeast Regional Office
Southwest Regional Office
Statue of Liberty National Monument
Wupatki/Sunset Crater National Monuments

United State Department of Agriculture
Forest Service
Boise National Forest
Custer National Forest
Gallatin National Forest
Kootenai National Forest
Nez Perce National Forest
Region 1
Region 3
Region 5
Region 6
Sawtooth National Forest

United States Environmental Protection Agency

Cody Lumber Company
Contra Costa Resource Conservation District
Contract Fire Fighting Appropriate Design
Dubols Alliance
Earth First!
Florida Wildlife Federation
Florida Farm Bureau Federation
Forests Unlimited
Foundation for North American Wild Sheep
Greater Yellowstone Coalition
Idaho Farm Bureau
Idaho Outfitters & Guides
Idaho Conservation League
Inter-Mountain Forest Industry Association
J.H. Outfitters & Guide
Jackson Hole Alliance
Montana Audubon Council
Mother Lode Miners Association
Mountain States Legal Foundation
National Forest Products Association
National Association of Conservation District
National Campers & Hikers Association
National Association of State Foresters
Nevada Farm Bureau
Northwest Wyoming Resource Council
Northwest Independent Forest Manufacturers
Pahaska Tepee
Public Lands Committee
Public Lands Foundation
Public Lands Council
Public Land Users Association
Public Lands Foundation of Billings, Montana
Public Timber for the Timber Association of California
Rangeland Consulting
Rural Alaska Community Action Program
Sacred Pipe Indian Mission
Sierra Club
Sierra Club, North Plains
Sierra Club, Montana Chapter
Sierra Club Legal Defense Fund
Snake River Audubon Society
Society of American Foresters
Stone Forest Industries, Inc.
Teton County Heritage Society
Uinta County Farm Bureau
Western Mountain Fish & Game Association
Western Wood Products Association
Weyerhaeuser, Corporate Headquarters
Wilderness Society
Wildlife Society, Idaho Chapter
Wildlife Society, Wyoming Chapter
Wind River Multiple Use Advocates
Wyoming Farm Bureau
Wyoming Wildlife Federation
Wyoming Heritage Society
Wyoming Travel Commission
Wyoming Outfitters Association
Yellowstone Park Preservation Council

Seattle, WA	2/9/89	25	3	Press release sent to all media in Idaho, Washington, and Oregon from the Seattle office. Legal ad ran in <i>Seattle Times</i> and <i>Post Intelligence</i> for one day.
Albuquerque, NM	2/9/89	20	3	Press release sent to all New Mexico media. Legal ad ran in the <i>Albuquerque Journal</i> February 6, 7, and 8.
Cody, WY	2/14/8	300	37	Press release sent to local radio stations (5) and newspapers (4). Legal ads ran in two local newspapers.

4b(7) – We are concerned . . . that Recommendation 4(b)7 could lead to excessive restrictions on the National Fire Program.

4f – Add a phrase encouraging development of a concept of values to be gained due to presence of a prescribed natural fire: "(f) Clearly stating the management objectives being addressed by the prescribed natural fire program, including identification of specific values gained as a result of allowing natural fires to burn unsuppressed within the prescription conditions and areas."

4g – Does public involvement and coordination with local government refer to plan development or plan implementation?

5 – Are the contingency plans developed independently or cooperatively by the agencies? Will the activities of one agency affect the operations of another agency?

5 – If we miss our acreage estimate, is control mandated? Size of fire should not be the only input in selecting tactics and strategy.

6 – We question the implication in recommendation No. 6 that a prescribed fire can be "returned to prescription." To most readers, this implies that a prescribed fire can temporarily exceed prescription while avoiding reclassification as a wildfire, which the team earlier states is unacceptable. . . . We recommend that the statement be revised to state that "If the fire exceeds or threatens to exceed prescription and cannot be kept within prescription with available forces and funds, it shall be declared a wildfire and appropriate suppression action initiated."

6 – If resources are not available, is a fire out of prescription? Will resources be held from suppression assignments to ensure their availability for prescribed fires? Exactly what will be accomplished by the line officers daily certifying adequate resource availability is not clear other than to show that resource availability was considered. Other things which should be considered are just as important, i.e. off site effects, public safety, etc.

7 – The use of planned ignitions within wilderness to treat fuels would likely involve a lengthy NEPA and appeals process here in this region but at least in some cases it may well be worth the effort.

7 – One should include evaluation of whether planned ignition burning would really stop wildfire or even reduce the habitat's flammability, with specificity for each plant community. Also, management objectives are not defined. Is this letting the natural process happen or is it manipulation?

7 – We are concerned with Recommendation 7 to use planned burning and other efforts to create fire breaks along the boundaries. Land unit boundaries are often political, but not biological boundaries.

7 – The option should be retained to conduct planned ignitions for fuel treatment purposes along defensible boundaries inside or outside of wilderness and not necessarily on administrative boundaries.

8a – Will this happen by making it a training requirement or selection criteria? If the latter is done, it could tend to affect affirmative action, so be careful.

8c – Finding qualified people will be difficult. This review item needs to be further thought out.

8 – Add a subparagraph (g) to encourage keeping a balanced program: "(g) In meeting this recommendation, agencies will not reduce existing funding and personnel capabilities regarding natural resource management and research. Rather, agencies will seek to increase those capabilities to ensure their contributions to natural resource decision making and program implementation remain in balance with the increased capability for fire control."

9c – [This] concerns agencies developing joint criteria for selecting appropriate suppression tactics in the wilderness and parks. The phrase "minimal impact" should be inserted after "appropriate".

9c – It is not clear exactly what this statement means.

9d – Are we talking about improved understanding within agencies, between agencies, by the public, or all three?

10 – Does this mean we have to make a determination if the NEPA process was adequately followed for plans presently approved?

10 – Recommendation 10 implies NEPA process is not always followed, and doesn't acknowledge USDA's land management planning process and public involvement that occurs.

11 – We concur with recommendation No. 11 concerning improved interpretation but feel that it should be strengthened. It really doesn't stress the critical need to develop and execute the proactive interpretation and

and special habitats. The review only looked at the fire management policy in national parks and wilderness areas.

Our national parks should be preserved as 100% whole, fully functioning, self-sustaining ecosystems following their own respective cycles and evolutions. . . . Parks should and indeed could serve as more accessible adjuncts to our fledgling and still pitiful wilderness system. They should not be "managed" into safe, fairly predictable Disneylands of plants and human-acclimatized or even human-dependent animals.

Prescribed Natural Fire and Planned Ignitions

If the report is suggesting that fires should be suppressed if they are projected to go beyond a certain size, I disagree. Size by itself is an incomplete indicator of the impacts of a burn. It would be far better to base management decisions upon the ultimate geographic area projected to burn and the impacts on other resources.

Several terms are used which generate questions about proposed operational requirements. These are: "Natural fire," "Prescribed fire," and "Natural prescribed fire." Their meanings are extremely important when defining suppression actions. The national definitions should be compatible with protection categories of Alaska Interagency Fire Plans to protect established management objectives. I urge you to carefully review the definitions.

It should be recognized that occasional high-intensity fires will occur under severe weather conditions. These naturally occurring fires are a potent force for ecological change and play an essential role in maintaining the health and biological diversity of the ecosystem.

The use of prescribed fires to manage wilderness areas is desperately needed. . . . It has been impossible to get federal agencies concerned about the role of fire in natural succession. As a result, crucial habitats for species like bighorn sheep are being lost because of vegetative changes, primarily conifer invasion.

Suggest that the term "human ignited" fires implies all man-caused; and that a better term would be "management ignited," to describe prescribed fires.

I think it would be beneficial to institute a regular prescribed burning program around properties to reduce the likelihood of catastrophic losses where inholdings do occur.

Planned ignition cannot be a substitute for natural fire and be consistent with wilderness objectives. It serves a useful purpose as a supplement or interim measure in attempting to restore natural fuel loadings.

Reduce natural fuels around towns.

Fire Management Plans

We need to be careful not to remove the decision making responsibility from the on-the-ground line officer yet develop and maintain or regain credibility with the public.

It is requested that the Fire Management Policy allow and provide for maintenance of adequate rights-of-way for utility facilities. Staff field inspections have shown that, in many cases, proper tree and fuel clearance has not been maintained in and along these rights-of-way. These rights-of-way must be kept free from trees and fuel to aid in the prevention of outages.

In addition to the current proposal, I recommend that decision criteria be included that will terminate prescribed burning and suppress lightning fires when wildfire conditions exist.

Define what fires we will control and whose methods can be used. Concentrate on initial responses to all fires. Stop profiteering on forest fires.

We need clarification of our role and responsibilities for public safety.

If resource availability other than what is adequate for current prescription becomes a criterion which would result in changing the status to "wildfire", then we might want to allow a return to "prescribed" status when that resource availability changed to more favorable.

The role of fire manager needs to be clarified.

Use consultants - use retired federal employees who have the expertise in fire management and have set up their own businesses. Use them for planning and reviewing plans, for inspections, and for reviews of accomplishment and performance.

Public Information and Involvement

The NPS should continue to accept wilderness and environmental education as part of its duties. It is not the responsibility of the NPS to protect the public from natural phenomena such as fire. Instead, NPS should educate the public about the risks they may encounter in dealing with such factors.

The report does little to recommend that Parks containing significant hazardous fuels review their present organization and public relations program.

We suggest improvement and better funded public information and wildland fire interpretation before, during, and after major fires.

We feel there is one aspect of the team's finding that needs to be more strongly addressed and that is education.

Costs and Funding

The whole cost picture must be examined, including potential costs and damages associated with a prescribed fire that later becomes a wildfire which requires aggressive suppression action. Cost statements must include federal suppression monitoring costs, and cooperating agency increased suppression costs resulting from reduction in local resources. The Department is also concerned with the higher per-acre suppression costs experienced by federal agencies.

We need to put our effort and funding into the relatively cheap action of fire proofing small areas around structures rather than attempting to change the fire history of the entire west.

Sufficient personnel and financial resources should be dedicated to this review task to expedite the process and minimize interruptions.

Research

Fire cycle data is nonexistent for many of the wilderness areas in Wyoming. Collection and analysis of such data, particularly its relationship to different successional stages, should be a prerequisite for preparation of Fire Management Plans and also a high priority for funding.

Recommend continued research and implementation of remote sensing/geographic information system technologies for use in assessing the fuels conditions, prescribing fuels management, and modeling real time fire behavior.

Other research recommendations:

- Identify the influence of smoke columns on fire growth and behavior and on spotting.

- Identify meteorological thresholds that result in rapid changes of fire behavior.

- Develop a system to identify drought conditions that forecasts potential fire season severity.

- Verify current fire behavior predictive systems; enlarge database to increase applicability of predictive systems if possible.

- Develop or identify models to predict winds over high elevation terrain.

- Identify factors causing transition from surface fire to crown fire.

- Develop a system for predicting growth of large fires.

- Identify the impact of fire exclusion on fire severity and the wildland/urban interface.

Greater Yellowstone Area

The fire team must go back and answer the President's question of the pre-fire management policies which caused the size and intensity of these fires.

We encourage further review and development of alternative means of analyzing the damage and off-site effects of suppression activities as well as of the fires themselves.

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DEPARTMENT of the INTERIOR

news release

OFFICE OF THE SECRETARY

For Release June 1, 1989

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NEW U.S. FIRE MANAGEMENT RECOMMENDATIONS APPROVED BY SECRETARIES OF INTERIOR AND AGRICULTURE

Secretary of the Interior Manuel Lujan and Secretary of Agriculture Clayton Yeutter today directed federal officials to suppress all natural fires in national parks and wilderness areas until individual fire management plans for the areas are determined to be in compliance with new federal recommendations.

The directive was one of fifteen the two cabinet members adopted from the recommendations of the federal interagency Fire Management Policy Review Team. The team was established last year to analyze U.S. Department of the Interior and U.S. Department of Agriculture fire management policies in national parks and wilderness areas.

The recommendations affect fire management policies of USDI's National Park Service, Bureau of Land Management, Fish and Wildlife Service and Bureau of Indian Affairs, and USDA's Forest Service.

Lujan and Yeutter said many of the fifteen recommendations will require long-range planning and coordination for implementation, but that others will become effective immediately.

In addition to the recommendation to suppress for the interim all natural fires in national parks and wilderness areas, other directives to be adopted immediately include the following:

(more)

Fire Management Review Team

May 5, 1989

Department of Agriculture

Department of the Interior

Memorandum

**To: Secretary of Agriculture
Secretary of the Interior**

**Through: Deputy Secretary, Department of Agriculture
Under Secretary, Department of the Interior**

From: Fire Management Policy Review Team

**Subject: Final Report Concerning Fire Management Policy
for National Parks and Wilderness Areas**

We are submitting our final report in accordance with the direction and schedule laid out by your predecessors. The Team's earlier report has undergone public review. The Team has reviewed the public comments and made some revisions in its report.

Both the Team's final report and the summary of public comments are attached. The Team feels that those reviewing and implementing its recommendations should also be aware of the range of public concerns reflected in the summary. Although the overwhelming majority of public comments were incorporated in or favorable to the Team's recommendations, other viewpoints are valuable in defining options and placing implementation actions in perspective.

Our recommendations include a number of significant changes in fire policy and its application to national parks and wilderness areas. While recognizing the important role of fire in natural ecosystems, we believe that these suggested improvements in fire management policy will reduce the risk of repeating the experience of the summer of 1988.

Implementation of the recommendations in this report should be assigned to and rest with line managers in the agencies involved in this effort, with coordination through established interagency fire coordinating groups. Both line managers and these interagency groups can ensure that prescribed fire policies and actions are logically integrated with the missions of the individual agencies and Federal lands, and the full range of suppression actions for wildfires.

The Team was established to review current U.S. Department of Agriculture and U.S. Department of the Interior policies on fire management in light of the extreme fire situation experienced in the Greater Yellowstone Area during the summer of 1988. The Team conducted a thorough review of fire policies for national parks and

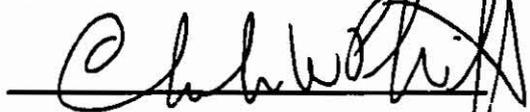
Department of Agriculture

Department of the Interior

wilderness areas. Much useful information was obtained during the formulation of our initial draft report through consultations with various elected officials, private citizens, representatives from academia, concessioners and outfitters, environmental groups, businesses, and other knowledgeable parties.

The charter establishing the Team also required that the Team's report be published in the Federal Register for public comment for a minimum of 60 days and that public hearings be held around the nation to elicit oral and written comments. A total of eleven public hearings were held. A team of Park Service and Forest Service specialists compiled comments from the 408 responses received, including those from Federal agencies, in a summary report with detailed cross-references. The Team met in Denver April 18-19, 1989 to consider the public comments and revise its report.

With the submission of this report, the Team considers its assignment to be completed. We thank you for the opportunity to serve.



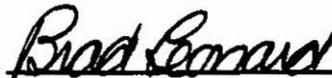
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