

# Issue Paper

## Implementing Appropriate Management Response (AMR)

### Background:

In 2003 the Wildland Fire Leadership Council approved the *Interagency Strategy for the Implementation of Federal Wildland Fire Policy*. The purpose was to establish unified guidance for agency/bureau manuals to achieve consistent implementation of the 1995 *Federal Wildland Fire Policy*, as updated in 2001. The 1995/2001 policy provided for a flexible response to wildland fire ignitions to better meet the multiple objectives of protecting life, property, and resources; reducing hazard fuels; and restoring ecosystems. This intent was embodied in the concept of appropriate management response (AMR), allowing managers to consider all benefits and impacts of an incident when designing a full spectrum of management strategies.

### Issue:

The 2003 *Implementation Strategy* appears to fundamentally alter the AMR concept articulated in 1995/2001 policy by limiting managers to only two choices on either end of the AMR spectrum of options.<sup>1</sup> This direction prohibits managing different parts of a given fire concurrently for suppression objectives and resource benefits<sup>2</sup> and limits changes in management strategies as conditions change on an incident.<sup>3</sup> This interpretation of the policy has confused fire managers and restricted the ability of agencies to achieve land management objectives articulated in local fire management plans. Failure to implement AMR consistently and effectively may have resulted in missed opportunities to use wildland fires to reduce hazardous fuels and in unnecessarily spending millions of dollars suppressing wildland fires (per USDA Office of Inspector General, Audit Report, November 2006).

### Discussion:

**The 2003 Strategy opposes the principle that the role of wildland fire needs to be expanded.** As recognized in the Cohesive Strategy and other documents, more fire use is needed to restore and maintain ecosystems. Even suppressed fires can produce some resource benefits that help achieve local land management objectives. Threats from fires can often be reduced with minimal suppression and point protection, reducing costs, benefiting resources, and increasing safety.

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<sup>1</sup> “Wildland fires will either be managed either for resource benefits or suppressed. The objective of a wildland fire use project is to obtain resource benefits whereas a wildfire is to be extinguished at minimum cost. A wildland fire cannot be managed for both objectives concurrently... A wildland fire cannot be managed for both objectives on different parts of the same fire at the same time” From the 2003 Implementation Strategy

<sup>2</sup> For example, managers cannot aggressively suppress one section of a wildfire that is threatening values such as WUI, and allow another section that is not threatening WUI to burn for resource benefits.

<sup>3</sup> Once any wildland fire is declared a wildfire, it must be suppressed and at no later point can be managed for resource benefit, even if changing conditions make this appropriate. See p. 5 below, Implementation Direction Flowchart from the 2003 *Implementation Strategy*.

**Local managers have less ability to utilize the full spectrum of wildland fire responses to achieve land and fire management objectives in accordance with local land and fire management plans.** The 2003 implementation strategy puts all wildland fires into one of three categories; wildfire, wildland fire use, and prescribed fire. *“Wildland fires will either be managed either for resource benefits or suppressed. The objective of a wildland fire use project is to obtain resource benefits whereas a wildfire is to be extinguished at minimum cost. A wildland fire cannot be managed for both objectives concurrently.”* Consequently, AMR is reduced to two categories that require different management strategies: suppression without regard for resource benefits, and WFU based on resource benefits. There is no flexibility to implement a *spectrum of tactical options* (from monitoring to intensive management actions) on a given fire. For example, managers cannot aggressively suppress one section of a wildfire that is threatening values such a WUI, and allow another section that is not threatening WUI to burn for resource benefits. This approach restricts the ability of managers to achieve land management objectives articulated in local fire management plans. The decision flowchart included in the 2003 Implementation Strategy (attached) implies that AMR only applies to the initial choice between WFU and suppression, not to a range or combination of suppression/fire use strategies applied to each fire.

**Managers are pressured to select fewer wildland fires for wildland fire use and more for full suppression.** The USDA FS OIG Report in November 2006 noted that under the dichotomy of WFU or suppression, the bureaus experience considerable pressure to begin fire operations as suppression, and that it is more difficult to obtain resources for other management strategies. Field units have noted this to be the case, particularly as local and national preparedness levels rise. An increase in the use of suppression strategy and a decrease in the use of WFU increases the need for extended attack resources, increases large fire costs, and reduces resource benefits.

**The Implementation Strategy may result in converting more wildland fire use events to suppression, which will reduce ecological benefits, increase the need for extended attack resources, and increase large fire costs.** By requiring that two converging fires be managed as a single incident with a single objective, the implementation strategy will result in lost opportunities to achieve land management objectives relating to fire use. If a WFU fire and a suppression fire merge, it is likely that the single incident will be managed under the more restrictive suppression strategy rather than a WFU strategy. Since the proposed policy also states that *“Wildland fires will either be managed for resource benefits or suppressed. A wildland fire cannot be managed for both objectives on different parts of the same fire at the same time”*, managers will no longer have the option of continuing to manage part of a fire to achieve resource benefits while suppressing other parts.

**Managers may implement more “confine/contain strategies in lieu of wildland fire use.** Some managers are attempting to achieve the desired outcome in land management plans by reverting to the old “confine” suppression strategies in order to avoid labeling their strategies as wildland fire use. Since they will not be allowed to acknowledge that this strategy is being employed for resource benefits (the objective of initial attack must be to *“stop the spread of the fire and put it out at least cost”*), there will inevitably be problems related to accountability for program accomplishments and outcomes. Monitoring data for landscape changes in vegetation, fire regimes, fuels, and condition classes will show that resource benefits sometimes did occur

from fires that were suppressed, but managers will not be able to claim credit for these acres as wildland fire use or as fuels treatments. This issue has been confirmed by the USDA FS OIG Report in November 2006.

**Inability to accurately account for performance and model fire programs in the Fire Program Analysis System (FPA).** In order to model the long-term success of integrated strategies of AMR and fuels management in achieving land management goals and objectives, the system must model the total effects of all fires, regardless of ignition source. In order to be a useful management tool, FPA will have to reflect local data relating to real cause and effect relationships between program strategies and program outcomes. In some cases the data on the beneficial consequences of fires used in the FPA model will conflict with official fire occurrence data. These inconsistencies will perpetuate a dichotomy between the information that managers use to analyze and make program management decisions, and the information that is reported to Washington and the public.

**Line Office and Fire Management Officers are often confused about implementing AMR.** Few Fire Management Staff and Line Officers understand or have experience implementing the full spectrum of the AMR as identified within Federal Fire Management Policy, resulting in some programs that may not fully meet management objectives, unnecessarily exposing the public and firefighters to risk, and increasing suppression cost.

**Lack of integration of incident teams, qualifications, and organizations.** Direction that wildland fire will be managed for either suppression or resource benefit has resulted in separate management qualifications, processes, procedures, and in many cases organizations. This adds training and implementation costs, increases the complexity of communication, and further limits the flexibility of implementing the full range of AMR options.

#### **Recommendations:**

Reaffirm the current 1995 and 2001 policy for managing wildland fire ignitions and revise the guidelines for managing wildland fire ignitions contained in the 2003 Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy as follows:

- Wildland fire will have a common decision process that is based upon desired conditions identified in the LU/RMP and FMU objectives identified in the FMP, and a cost/benefit analysis considering potential costs (including post fire costs) and benefits.
- Wildland fire may be managed with multiple concurrent objectives, strategies, and tactics as addressed in Land Use/Resources Management Plan, Fire Management Plan, associated operational plans, and availability of resources. (see OIG Recommendation 5)
- The term Appropriate Management Response needs to be interpreted in a way that clarifies that wildland fire use and full suppression are simply two ends of the spectrum of responses to wildland fire.
- Appropriate Management Response will apply to each wildland fire initial response, and includes the full spectrum of actions from aggressive suppression to wildland fire use, including intermediate strategies that utilize various degrees of suppression and monitoring.

- Wildland fire objectives and strategies may change over time based on the result of analysis and decision documentation. (see OIG Recommendation 6)
- Acreage burned in wildland fire will be classified and reported as “improved” or “damaged” based upon whether the effects of the wildland fire moved the impacted area toward or away from desired conditions identified in the LU/RMP and/or FMPs. (see OIG Recommendation 7) For simplicity those acres burned in maintenance of a desired condition will be reported as “improved”.
- Agency Administrators and Fire Management staff must define the required incident management team requirements. This would include but not be limited to role and responsibility, configuration, and response times.
- All ignitions, whether human or natural, can be considered for the full range of responses available. Human ignitions need not necessarily be fully and totally suppressed each and every time, depending upon the objectives of the LU/RMP.

The WFLC should also provide clear direction to FPA and Wildland Fire Decision Support system about the range of management options that need to be modeled or evaluated for strategic planning and decision support on initial response and large fires, so these tools will support effective application of AMR.

## Comparison of the 1995/2001 Federal Fire Policy to 2003 Implementation Strategy

### 1995 Federal Wildland Fire Policy and Program Review

Page iii: Executive Summary: *“Wildland fire management decisions and resource management decisions go hand in hand and are based on approved Fire Management and land and resource management plans. At the same time, agency administrators must have the ability to choose from the full spectrum of fire management actions – from prompt suppression to allowing fire to function in its natural ecological role.”*

Page 5: Guiding Principles and Policies: Suppression: *“Fires are suppressed at minimum cost, considering firefighter and public safety, benefits, and values to be protected, consistent with resource objectives.”*

Page 9: Reintroduction of Fire: *“Planning should consider all wildland fire, regardless of ignition source, as opportunities to meet management objectives. In areas where planning has determined a range of appropriate management actions for the use of wildland fire, there will be more opportunities to safely and cost-effectively reintroduce fire.”*

### 2001 Federal Fire Policy

Fire Operations, page iv. Executive Summary: *“The 2001 Federal Fire Policy clearly states that response to wildland fire is based on the Fire Management Plan, not the ignition source or location of the fire.”*

Appendix b: Appropriate Management Response: *“The response to a wildland fire is based on an evaluation of risks to firefighter and public safety, the circumstances under which the fire occurs, including weather and fuel conditions, natural and cultural resource management objectives, protection priorities, and values to be protected. The evaluation must also include an analysis of the context of the specific fire within the overall local, geographic area, or national wildland fire situation.”*

Appendix C: Policy: Ecosystem Sustainability, page 39: *“The full range of fire management activities will be used to achieve ecosystem sustainability including its interrelated ecological, economic, and social components.”*

Appendix C: Policy: Modifications to the 1995 Federal Fire Policy Statements, page 41: Planning. *“This policy statement was changed to clarify the role and nature of Fire Management Plans as the fundamental strategic documents, based on land use plans, to guide the full range of fire management related activities in a unit or area.”*

Appendix D Policy Element, Response to Wildland Fire, page 43: *“The circumstances under which a fire occurs, and the likely consequences on firefighter and public safety and welfare, natural and cultural resources, and values to be protected dictate the appropriate response to the fire.”*

### 2003 Interagency Strategy for the Implementation of Federal Wildland Fire Policy

Page 4: *“Only one management objective will be applied to a wildland fire. Wildland fires will either be managed for resource benefits or suppressed. A wildland fire cannot be managed for both objectives on different parts of the same fire at the same time. If two fires converge, they will be managed as a single incident with a single objective.”*

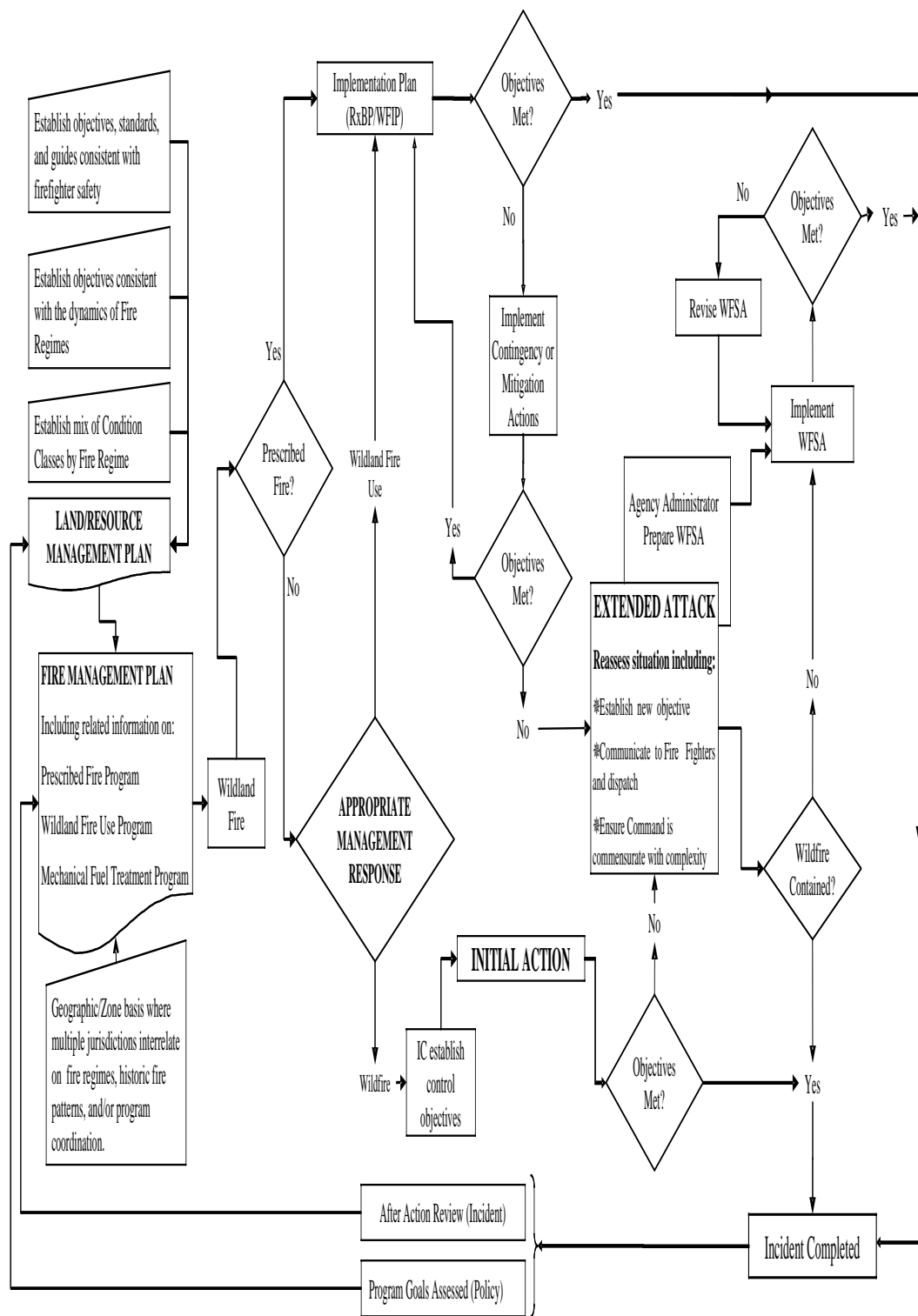
Page 4: *“Human caused wildland fires will be suppressed in every instance and will not be managed for resource benefits.”*

Page 5: *“Once a fire has been managed for suppression objectives, it may never be managed for resource benefit objectives.”*

Page 15: *“The objective of wildland fire use is to obtain resource benefits whereas a wildfire is to be extinguished at minimum cost”*

Page 16: *“The AMR for a wildfire is initial attack. The objective of initial attack is to stop the spread of the fire and put it out at least cost.”*

# Implementation Direction Flowchart for the Federal Wildland Fire Management Policy



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