

**Begging the Question: Appropriate Management
Response as a Toolbox vs. Tautology:
Integrating Safety, Ethical, and Ecological
Sideboards into AMR**

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February 2008

INTRODUCTION TO THE APPROPRIATE MANAGEMENT RESPONSE

Before the start of the 2008 wildfire season in the West, one of the most significant changes to federal fire management policy will be launched. The firm divisions between wildfire suppression and wildland fire use will start to fade, and instead, all unplanned fires will receive the Appropriate Management Response (AMR). Fire suppression and fire use objectives, strategies, and tactics will be combined on a single fire incident. Thus, for example, on one portion of a fire, aggressive suppression with perimeter control objectives might be employed to stop fire from spreading toward a community at risk, but on another portion of the same fire, there might be only monitoring actions with no fireline construction in order to use fire for resource benefits. In the future, a single tactic (e.g. backfiring) might be used to both “put out” a fire (accomplishing the suppression objectives of wildfire containment) and also to “put in” a fire (accomplishing the restoration objectives of fire reintroduction). Fire planning and management operations will become more complex, dynamic, and multidimensional, just like...*wildland fire!*

This philosophical and policy shift will unfold fairly slowly, perhaps taking several years to be fully implemented in practice, and some regions will do better than others in applying the new policy. Indeed, the U.S. Forest Service made an official policy change from fire control to fire management in 1978, but 30 years later the dramatic changes made on paper have been frustratingly slow to be put into practice, and upwards of 98% of all unplanned wildland fires are still aggressively suppressed. But the shift towards AMR—essentially a shift towards authentic fire management—is clearly where the agencies and society must go in order to reduce the risks, costs, and impacts of traditional wildfire suppression. The new AMR policy has the potential to greatly shift the paradigm in the direction FUSEE has been advocating—less reactive fire “fighting” for the sake of controlling Nature, and more proactive fire *management* for multiple social and ecological benefits. However, the new policy has some potential pitfalls and conceptual contradictions that could undermine its promise. The wildland fire community must get involved in discussing and debating both the form and substance, philosophy and practice, of the emerging AMR policy with utmost urgency. This goal of this paper is to initiate that wider discussion now.

ORIGINS OF THE AMR CONCEPT

The concept of AMR originated with the 1995 and 2001 Federal Wildland Fire Management Policy ("Federal Fire Policy"). The AMR concept was a progressive leap forward from the previous term, the *Appropriate Suppression* Response, explicitly stating that suppression was no longer supposed to be the assumed "default" response to wildland fires. Regrettably, implementation of the Federal Fire Policy languished for several years from a lack of agency leadership and the failure to implement some key items such as Policy-compliant Fire Management Plans. Along with that neglect of the Federal Fire Policy, the AMR concept was largely overlooked and ignored.

The 2001 Review and Update of the Federal Wildland Fire Management Policy included a new provision that promised to end the longstanding bifurcation of fire policy that compelled strictly separate sets of objectives, strategies and tactics depending on whether unplanned ignitions were natural or human-caused. According to the Updated Federal Fire Policy, "it is the ecological, social, and legal consequences of the fire, and values to be protected, that dictate the AMR to a given fire."¹ Furthermore, "The AMRs to wildland fires will be based on approved FMPs and land management plans, regardless of the source or location of the ignition."² In sum, the AMR was supposed to be both partially pre-planned, based on direction and prescriptions in the FMP, and partly based on situational factors, such as current and expected weather conditions, values at risk, resources available, etc.

THE BUSH ADMINISTRATION'S 2003 IMPLEMENTATION STRATEGY: ANOTHER PRESIDENTIAL "SIGNING STATEMENT"

The Review and Update of the Federal Wildland Fire Management Policy was finalized in January 2001 just days before the Bush Administration took over. Miraculously, the Federal Fire Policy escaped the Bush Administration's moratorium on the Clinton Administration's environmental initiatives such as the Roadless Area Conservation Rule. However, in July 2003 the Bush Administration came out with a document titled the "Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy" ("Implementation Strategy"). The stated purpose of this document was to "clarify" the 2001 Federal Fire Policy Update, and to set forth direction for "consistent" implementation that was "simple, straightforward, and free of ambiguity."³

Five new policy directives were laid out in the Implementation Strategy:

¹ Review and Update of the Federal Wildland Fire Management Policy, p.23 (USDA/USDI, 2001)

² Review and Update of the Federal Wildland Fire Management Policy, p.26 (USDA/USDI, 2001)

³ Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy (June 20, 2003)

1. **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 concurrently. If two wildland fires converge, they will be managed as a single wildland fire. [emphasis added]

In other words, if a large Wildland Fire Use incident was being successfully managed but some sociopath ignited an arson fire nearby, and the two fires merged, then the whole fire had to be suppressed without any consideration for resource benefits. Amongst fire use managers, this was known as the “contamination” model because like some virus infecting a large cell, a suppression fire would compel a fire use event to be instantly converted to a suppression incident.

2. Human caused wildland fires will be suppressed in every instance and will **not** be managed for resource benefits. [emphasis added]

This directive explicitly contradicted the Federal Fire Policy which clearly stated that it is the current and predicted conditions of a fire that determines the appropriate management response to it, not the fire’s location or source of ignition. This directive thus functioned like a “line item veto” of that critical policy reform.

3. Once a wildland fire has been managed for suppression objectives, it may **never** be managed for resource benefit objectives. [emphasis added]

By this directive, if conditions changed on a WFU incident that compelled managers to suppress it, they could never go back to managing it for fire use for resource benefits if conditions returned to the original prescription—they had to put it all out. This directive dictated a one-way dead-end street from WFU to suppression.

4. The AMR is **any** specific action suitable to meet FMU objectives. The AMR is developed by using FMU strategies and objectives identified in the FMP. [emphasis added]

This directive greatly expands the options and opportunities for using the full suite of fire management techniques on wildland fires, but Land/Resource Management Plans and Fire Management Plans are notoriously lacking in site-specific data or guidance. Thus, the complete openness to include any and all possibilities in AMR offers both extreme flexibility and managerial discretion, but also an extreme lack of accountability and managerial direction. Given the near-complete lack of transparency in decision-making during fire operations, and the poor state of pre-fire planning, how to ensure that flexibility is balanced with accountability and managerial discretion does not simply become managerial fiat?

Many of the Bush Administration’s environmental initiatives have been widely criticized for their deceitful “Orwellian” doublespeak of saying one thing and intending to do exactly the opposite (for example, the “Clear Skies” initiative sought to allow more industrial air pollutants, the “Healthy Forests” Initiative sought to increase commercial logging,” and so on). The misnamed “Implementation Strategy” for the Federal Fire Policy should be added to this list of Orwellian double-speak. In essence it was the

equivalent of one of President Bush's infamous *signing statements* on a Congressional bill—it substituted the Administration's own "simple, straightforward, unambiguous" language, and in so doing, it effectively negated much of the letter and spirit of the Federal Fire Policy.

CONFLATING AMR WITH FIRE SUPPRESSION

Unfortunately, there is considerable confusion within the fire management community about AMR, and one of the most common mistakes is to believe that AMR is just another "kinder, gentler" method of fire suppression. Several of the memorandums and guidebooks the U.S. Forest Service has produced to educate its own staff about AMR have committed the error of conflating AMR with fire suppression. A couple of illustrative examples:

"Clear and concise understanding of AMR (will ensure) choosing the best **suppression** strategy for the resources at risk."⁴ [emphasis added]

"AMR (is) a risk-informed, performance-based system that will increase flexibility in how wildland **firefighting** decisions are made."⁵ [emphasis added]

Given the cultural and institutional dominance of fire suppression within federal fire management, it is understandable that many people would focus on firefighting when discussing AMR. Indeed, from a practical standpoint, the lack of quality fire planning in LRMPs and FMPs puts considerable limitations on the range of possible objectives, strategies and tactics for responding to wildland fires. Most federal units in the foreseeable future will likely opt for run-of-the-mill wildfire suppression as their first and only choice for the AMR. Even in the National Park Service—the vanguard federal agency for implementing fire use--there are only a handful of National Park units that have adequate FMPs, an experienced fire management staff, and a sufficient land base to enable a full implementation of the AMR policy during the coming 2008 wildfire season. Regardless, the definition of AMR needs to clearly articulate that it includes much more than suppression, and this major source of confusion needs to be "clarified" and eliminated from official documents.

AMR AS A TOOLBOX VERSUS TAUTOLOGY

According to the Federal Fire Policy, AMR is intended to **include all available strategies and tactics**, encouraging managers to consider of a wide spectrum of management options for responses based on the circumstances of a particular fire. AMR can take on various "hybridized" forms, and represent a combination of strategic and tactical actions on a single incident. Thus, for example, on one portion of a fire, aggressive suppression with perimeter control objectives might be employed to stop fire from spreading toward a community at risk, but on another portion of the same fire, there might be only monitoring actions with no fireline construction in order to use fire

⁴ USFS Fire and Aviation Briefing Paper (5/30/07)

⁵ USFS Fire and Aviation Briefing Paper (5/30/07)

for resource benefits. Additionally, places where monitoring is approved may adopt some contingency or full-on suppression if fire weather or fire behavior conditions change. This means that the AMR may be different in time, as well as place, and as conditions change, the particular response can change to accomplish objectives.⁶ Again, both fire planning and management operations will become more complex, dynamic, and multidimensional in order to the apply AMR to its fullest potential benefit.

The application of AMR provides agencies with the greatest flexibility possible, and this expansion of choices in objectives, strategies, tactics, or “tools” is laudable. FUSEE wholeheartedly supports empowering fire managers and firefighters on the ground with the tools and decision-making space they need to do the right thing. Good people are going to be able to do *great* things in terms of reducing risks to firefighters, containing costs, maximizing the efficiency and effectiveness of operations, limiting the environmental impacts caused by traditional suppression actions, and promoting fire use. However, some individuals could also do some awful things with the increased discretionary powers and lax performance measures of the AMR concept at this stage of its development. The definition of AMR as “*any* specific action taken in response to a wildland fire...” inherently lacks specificity and is all-inclusive to the point of lacking any real-world definition.

The current definition of AMR in official policy documents and Forest Service guidebooks suffers from an inherent tautology or circular reasoning by committing the error of defining itself in its own terms. In essence, the Appropriate Management Response is *any response a manager deems appropriate*. This self-referential and all-inclusive definition of AMR really begs the question: if anything and everything can be the AMR, is there such a thing as an *inappropriate* management response? If so, then how does one distinguish between an appropriate and inappropriate action? While most people can agree that getting firefighters injured or killed is inappropriate, spending huge sums of taxpayer dollars to protect low-value assets is inappropriate, and inflicting serious long-term environmental damage on sensitive sites is inappropriate, these determinations when made in hindsight are too late for any good—the losses, costs, and damages have already occurred. How can the definition of AMR be refined so that potentially inappropriate acts are identified and avoided beforehand?

CREATING SAFETY, ETHICAL, AND ECOLOGICAL SIDEBOARDS FOR AMR

The answer is: we need some philosophical principles, some standards and guidelines, some clearly-defined “sideboards” to help managers make the appropriate decisions. FUSEE would base these sideboards according to our values of integrating safety, ethics, and ecology. Accordingly, it would be generally inappropriate to send out an engine crew to protect a single unprepared structure in an indefensible location at the end of a dead-end road; or order retardant drops when there were no ground forces positioned to take advantage of those drops; or ignite a backfire at the bottom of a steep slope in a protected forest reserve during severe fire weather conditions; or put in several miles of catline inside an inventoried roadless area that was a candidate for wilderness designation. Although there might be some rare cases where some of those tactics might

⁶ Wildland Fire Management Efficiencies: Implementation Guidelines (USFS, 7/07)

be appropriate in the given situation, as a general rule, safety, ethical, or ecological sideboards would make those actions inappropriate in the situations so described. The bottom line is: we need a definition of AMR that empowers managerial flexibility without it becoming purely managerial fiat, that provides managers with both discretion and direction, and ensures accountability mechanisms to reward successes and learn from mistakes.

Creating sideboards for the selection of AMR is a means of developing accountability by compelling managers to respect pre-planned limits on management discretion, and to learn from mistakes. Accountability can also be enhanced by pre-fire planning in LRMPs and FMPs to develop ecological assessments and site-specific goals for desired future conditions. These would provide the baseline for measuring the effects of management actions. Accountability can also be created by making fire operations more transparent, informing the public in real-time with the data and decision-making process used to select AMR strategies and tactics. Creating sideboards, investing in pre-fire planning, and making fire operations more transparent to the public are all important means of balancing managerial flexibility with agency accountability, ensuring that management responses to wildland fires are indeed *appropriate*, not arbitrary, accidental, or ad hoc.

CONCLUSION: FUSEE RECOMMENDATIONS FOR AMR POLICY

Notwithstanding the above constructive criticisms, FUSEE is very enthusiastic and supportive of the impending policy shift to AMR. Realistically, it is going to take some time for true balance and integration of fire suppression and fire use to be achieved in AMR. This requires more than a policy change on paper, but actual top-down commitments from agency leaders and bottom-up cultural change from field managers and workers. The following policy recommendations have been offered by FUSEE to the "AMR Task Group" chartered by the National Fire and Aviation Executive Board to craft the new AMR policy.

FUSEE AMR Policy Recommendations:

- 1) Rescind the "Operational Clarification" section of the 2003 Implementation Strategy
- 2) Redouble efforts to educate incident command teams, line officers, and fire management workers at all levels about the Federal Fire Policy and AMR
- 3) Revise and/or amend Forest Plans and FMPs to include fire ecology data and ecological fire restoration objectives for determining the "appropriateness" of AMR strategies and tactics in specific sites and situations
- 4) Develop standards and guidelines, performance measures, and sideboards for ensuring accountability of AMR decisions
- 5) Expand and enhance the resource advisor program

FUSEE supports the proposal that every fire, complex of fires, or merged fire should be managed for multiple concurrent objectives with all the strategies and tactics allowed by

FMPs. We also support the Federal Fire Policy that allows both human-caused and natural ignitions to receive the full suite of AMR options available. What we would like to see is that suppression and fire use objectives are merged so that whenever and wherever possible, every suppression action would also serve pre-planned fuels reduction or ecosystem restoration objectives.

Perhaps the very definition of fire suppression should be changed so that it no longer means keeping fires to their smallest size or shortest duration through traditional contain-and-control strategies, but rather, the intensity or severity of a fire is suppressed, where ecologically appropriate, but their size or duration is allowed to grow as necessary or desired. Ultimately, every fire management action from suppression to fire should have social and ecological objectives firmly in place and foremost in mind. We should stop fighting fires in a mindless fashion simply for the sake of fighting fires—and start managing fires wisely to maximize their benefits and minimize our impacts. Safety, ethics, and ecology should be integral values for developing sideboards to help us define and distinguish what is appropriate from what may be inappropriate management actions in response to fires.

Note: This is a revised version of an oral presentation given at the Conference on "Fire in the Southwest: Integrating Fire Management into Changing Ecosystems," Association for Fire Ecology, Tucson AZ, Jan. 30, 2008