



Firefighters United for Safety, Ethics, and Ecology

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To: AMR Task Group Members
From: Timothy Ingalsbee, Executive Director, FUSEE
RE: FUSEE's Policy Recommendations for the AMR Task Group
Date: December 12, 2007

Dear AMR Task Group Members,

Thank you for this opportunity to provide input to the AMR Task Group. FUSEE wholeheartedly supports the objective of revising the 2003 Implementation Strategy (i.e. the "Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy," dated June 20, 2003), in order to successfully implement the Federal Wildland Fire Policy, increase opportunities for fire use strategies and tactics to be applied in the field, and eliminate constraints on fire managers' ability to use all of the options provided by the Federal Fire Policy's concept of AMR.

The following represents our view of the policy proposals that are needed to occur, and the strategic preparation and/or follow-up work that needs to be conducted by the entire fire management community in order to ensure that the AMR policies are successfully communicated and implemented on-the-ground. We have divided our input into a set of "Strategic Recommendations" and "Policy Recommendations." The strategic recommendations may or may not be within the scope of the AMR Task Group's charter, but we feel they are essential for successful implementation of the Federal Fire Policy, as well as acceptance of the Policy recommendations that we urge the AMR Task Group to adopt.

Strategic Recommendation #1: Rescind the "Operational Clarification for Consistent Implementation" section of the 2003 Implementation Strategy and replace it with new policy directives.

Discussion: Regardless of the intent of the authors of the 2003 Implementation Strategy, paradoxically, the objective outcome has been to constrain full implementation of the Federal Wildland Fire Policy, especially its provisions for Wildland Fire Use and a full spectrum of strategies and tactics suitable for the Appropriate Management Response. The easiest way to eliminate these constraints would be to completely rescind the section on "Operational Clarification for Consistent Implementation" (pg. 1, 5-6). The rest of the 2003 Implementation Strategy provides a useful assessment of the status of the agencies' implementation of the Federal Wildland Fire Policy, and a list of recommended tasks and action items needed to move the implementation process forward. We urge the AMR Task Group to go beyond simply removing the

“operational clarification” section of the 2003 Implementation Strategy, and use the opportunity provided by the Group’s charter to propose new policies such as those we have offered below.

Strategic Recommendation #2: Redouble Efforts to Educate Incident Management Teams about the Federal Wildland Fire Policy and AMR

Discussion: It is clear from the 2007 fire season that lots of confusion about AMR and inconsistent implementation of the Federal Fire Policy exists within the fire management community despite the 2003 Implementation Strategy’s attempted “operational clarification for consistent implementation.” As soon as the AMR Task Group’s new policy recommendations are approved by the NFAEB and WFLC, AMR policies should be actively promoted by all agencies at all levels of fire management. Internal education should begin with next Spring’s scheduled meetings of Incident Management Teams and carried on through to basic firefighter training and refresher courses. AMR Policy should be disseminated through formal firefighter trainings, workshops, conferences (including conferences organized by non-agency partner groups such as the Association for Fire Ecology and the International Association of Wildland Fire) teleconferences, powerpoint presentations, literature, as well as more formal revisions of agency Manuals and Handbooks.

Strategic Recommendation #3: Conduct Special Trainings for Line Officers to Instruct Them about the Federal Wildland Fire Policy and AMR

Discussion: Line Officers and decision-makers at all levels also need to be educated about the Federal Fire Policy and AMR. Line Officers should have the clearest understanding of LRMP goals and objectives, and be able to clearly articulate the range of acceptable AMR tactics in their delegations of authority and input to WFSAs and WFIPs. Agency leaders (e.g. WFLC) may need to issue special directives to Line Officers to motivate their participation in educational activities and gain full acceptance of the Federal Fire Policy and AMR by all employees involved in resource and fire management.

Strategic Recommendation #4: Revise and/or Amend LRMPs to Include Fire Ecology Data and Ecological Fire Restoration Objectives for Determining the “Appropriateness” of AMR Strategies and Tactics

Discussion: The definition of “appropriateness” of AMR strategies and tactics is still vague and largely undefined. AMR tactics are supposed to be determined according to management objectives disclosed in LRMPs and FMPs, and incorporate such issues as firefighter and public safety, fire behavior, values at risk, resource availability, and cost effectiveness. In our opinion, the definition of “appropriate” and determination of “resource benefits” should be grounded in the fire ecology of a given area or community, and management responses to wildland fire should foster ecological fire restoration and maintenance objectives, or at least not contradict them. However, fire ecology data and fire

restoration/maintenance objectives are largely missing from most LRMPs and FMPs. Consequently, the agencies will need to conduct Forest and other Land Management Plan Revisions and Amendments in order to delineate fire ecology and restoration objectives for selecting AMR strategies and tactics.

Strategic Recommendation #5: Revise and Update FMPs to Include Fire Ecology Data and Ecological Fire Restoration Objectives for Determining AMR in Specific FMUs

Discussion: Some fire managers are under the false impression that by eliminating the distinction between WFU and suppression, and designating all wildland fires as “AMR Fires,” that this will enable them to implement WFU tactics without the necessity of revising or updating their FMPs. On the contrary, FMPs are the cornerstone plan for implementing the Federal Wildland Fire Policy and managing wildland fires. FMPs guide the AMR by developing strategies and objectives within designated FMUs. Consequently, the selection of the *appropriate* management response to a wildland fire will be even more dependent upon careful pre-fire analysis, planning, and mapping information disclosed within FMPs. Thus, FMPs will need to be revised and updated to provide proper direction to fire managers and line officers tasked with selecting AMR strategies and tactics within specific FMUs.

Strategic Recommendation #6: Develop Standards and Guidelines for Ensuring Accountability in AMR Decisions

Discussion: We are highly supportive of the goal of empowering fire managers with greater flexibility and discretion in order to select a wider range of strategies and tactics to manage wildland fires, but there must also be clear accountability mechanisms to ensure that managers use their discretion appropriately. We are hopeful that the AMR policy changes will lead to more fire use, more monitoring actions, more minimum impact suppression tactics (MIST), but we are also concerned that given the legacy of a suppression-dominated and risk-adverse fire management culture, managers may continue to select more aggressive suppression tactics at the expense of fire use opportunities. We are especially concerned about this given the likelihood that the WFU program will be eliminated as a separate entity. As long as there is no way to authorize and ensure that resource management objectives are met alongside maintaining fire protection objectives, AMR cannot be considered as equivalent to WFU. Consequently, new standards and guidelines will need to be developed to increase accountability of managers in their selection of AMR.

Strategic Recommendation #7: Develop New Performance Measures for Recording Accomplishments in Both Resource Management and Fire Protection Outcomes in AMR

Discussion: New performance measures need to be developed to provide incentives for fire and land managers to implement fire use strategies and tactics that reduce costs and accomplish resource benefits while simultaneously

achieving fire protection objectives. Fire managers should be able to receive credit for fuels reduction and ecosystem restoration/maintenance accomplishments through fire use, while also conducting fire suppression actions as part of AMR on the same wildland fire. In order to properly receive credit for resource benefits from fire use, objectives and outcomes of firing operations should move burned areas towards desired future conditions disclosed in LRMPs, and implement the burning prescriptions within given FMUs disclosed in FMPs. Thus, performance measures of fire use tactics should not merely be quantitative assessments of fire size (e.g. amount of "acres burned"), but instead, should primarily be *qualitative* assessments of fire effects (e.g. whether or not the burned acres fit the desired locations, patch sizes, and severities) authorized in LRMPs and prescribed in FMPs. Fire managers should also receive credit for success in point protection strategies that incorporate fire use tactics. In some cases, documentation will need to be changed (e.g. the ICS-209 form) in order to record both fire use for resource management and fire suppression for point protection objectives.

Strategic Recommendation #7: The Resource Advisor Program Needs to be Enhanced and Expanded

Discussion: It will take some time to reeducate line officers, incident management teams, and firefighters about the philosophy, policy and practices of AMR. Resource Advisors (READs) will be essential assets in this educational process. Ideally, READs should be attached to every Incident Management Team, working directly under the Incident Commander and Fire Use Manager in the Command and General Staff at the same level as the Safety Officer and Fire Information Officer. READs can help determine the AMR according to ecological criteria and objectives. Additionally, READs should be attached to each fire management crew to help monitor fire ecology effects, document fire management impacts, and train crews on MIST that accomplish the AMR. Increased documentation of fire suppression effects will be needed both for adaptive management (e.g. development of Incident Action Plans) as well as accountability (e.g. After Action Reviews), and READs should play a major role in this documentation process.

The above Strategic Recommendations may or may not fall outside the scope of review and policy recommendations by the AMR Task Group's charter, but we believe they are essential components of making a successful shift to AMR on all wildland fires. The Policy Recommendations below are intended to resolve the problems caused by the "Operational Clarification for Consistent Implementation" section of the 2003 Implementation Strategy, and move towards more successful implementation of the Federal Wildland Fire Policy. FUSEE strongly urges the AMR Task Group to consider and adopt the following Policy Recommendations:

Policy Recommendation #1: The Federal Wildland Fire Management Policy (1995/2001) is the primary wildland fire policy reference source and foundational document for managing wildland fire. Every line officer, fire manager, and crew supervisor should be fully aware and supportive of the Policy's guiding principles and policy directives.

Policy Recommendation #2: Every wildland fire, complex of fires, or merged fires may be managed for multiple concurrent management objectives, strategies, and tactics based on L/RMP direction and FMU objectives identified in the FMP. The AMR will apply to each wildland fire incident beginning with the initial action, and as fire events progress spatially and temporally, management objectives, strategies and tactics for the AMR may change accordingly.

Policy Recommendation #3: Both human-caused fires and natural ignitions will receive the AMR using the full suite of strategic and tactical options available within a given FMU. Beginning with the initial response, it is the current and potential behavior of a fire, and the pre-fire LRMP/FMP direction for that FMU, that determines the AMR, not the source of ignition. Human-caused ignitions may not necessarily be fully or totally suppressed each and every time, but instead, they may be monitored and/or used for resource benefits within their FMUs. Criteria for managing human-caused fires with fire use or monitoring strategies and tactics should be determined in LRMPs and FMPs.

Policy Recommendation #4: Wildland fire management will have a common decision-making process. When the Wildland Fire Decision Support System (WFDSS) is fully developed and ready for field implementation, it shall replace the Wildland Fire Situation Analysis and Wildland Fire Implementation Plan to determine appropriate strategies and tactics for managing wildland fires. Until the WFDSS is ready for use system-wide, Long-Term Implementation Plans (LTIPs) will be used alongside WFSAs and WFIPs to manage long-duration large fire events.

Policy Recommendation #5: The full spectrum of acceptable AMR strategies and tactics within a given FMU will be determined based on LRMP/FMP direction and objectives combined with considerations for: firefighter and public safety; current and potential fire behavior; adverse and beneficial ecological effects of fire; short-term and long-term suppression impacts (including both direct impacts of fire suppression actions and indirect/cumulative impacts of fire exclusion); social and ecological values at risk; firefighter/resource availability; and the economic costs and benefits of management actions (including cost of BAER treatments).

Policy Recommendation #6: In accordance with the principle that the ecological role of wildland fire needs to be expanded in land/resource management, fire use will be incorporated in development of the AMR strategies and tactics (including suppression) whenever and wherever possible. Inside FMUs containing fire-dependent communities and/or frequent-fire regimes (e.g. Fire Regime 1), or in areas where fire regimes have not been significantly altered by fire exclusion policies (e.g. Alaska), fire use will become the primary of “default” AMR, and Line Officers and fire managers will need to justify doing aggressive suppression without fire use within these FMUs.

Policy Recommendation #7: Line officers and fire managers will be able to manage wildland fires and record accomplishments for both resource management benefits and resource/community protection on all wildland fires. Assessment and accountability for achievements in resource management and fire protection will be based on LRMP desired future conditions, FMP and FMU objectives, and the outcomes of fire management actions.

Thank you again for this opportunity to provide input and offer policy recommendations to the AMR Task Group. If you have any questions or would like to discuss our proposals in more detail, please do not hesitate to contact us. In order to facilitate better dialogue, FUSEE would like to work closer with the AMR Task Group. Please let us know if it is possible for us to participate in the Group's conference calls or attend future meetings. We are especially interested in providing additional input on any draft policy proposals that the AMR Task Group produces in the future.

Sincerely,

Timothy Ingalsbee, Ph.D.
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