

OUTDOOR ALLIANCE

June 28, 2022

Chief Randy Moore
USDA Forest Service
1400 Independence Ave., SW
Washington, D.C. 20250-0003

Re: Pause of prescribed fire operations on National Forest System lands

Dear Chief Moore,

On behalf of the outdoor recreation community, we write regarding your recent decision to pause prescribed fire operations nationally. We strongly support prescribed fire as a key strategy for mitigating wildfire risk and restoring fire resilience to our nation's fire-dependent forests. We support your initiative to review the factors that influenced recent prescribed fire escapes; we are concerned, however, about the longer-term affects that a full national pause on prescribed fire may have on the federal prescribed fire program. We hope that the Forest Service uses the review as an opportunity to improve the safety and efficacy of its prescribed fire program, and we support you in lifting the pause prior to the fall 2022 prescribed fire season.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

The outdoor recreation community is increasingly affected by severe and destructive wildfires. In recent years, our community has become accustomed to multi-week periods of hazardous air quality due to wildfire smoke, closures of public lands due to fire danger, direct impacts to recreational infrastructure like trails, roads, and campgrounds, and damage to ecosystems and scenic values that are important to the recreation experience. Collectively, these wildfire impacts



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make outdoor recreation unsafe, impractical, or in some cases illegal during a period of the year that has traditionally been considered peak recreation season. Worsening wildfire seasons also threaten the growing outdoor recreation economy, which accounts for nearly 2% of U.S. gross domestic product.

This year, New Mexico and neighboring areas of the southwest have already experienced an intense fire season. Four out of five national forests in New Mexico have been largely closed to the public due to wildfire danger until recently. The 2022 New Mexico fires, one of which began in part as an escaped broadcast burn, are devastating for New Mexico's communities and local economies. These communities, as well as the numerous federal, state, and local fire crews involved in the fire suppression effort, absolutely deserve a review of the factors and decisions that led to the prescribed fire escape, including lessons learned about how a similar outcome can be prevented in the future. Coupling this review with a nationwide pause on prescribed fire operations, however, postpones greatly needed restoration work in other regions of the country, raising the likelihood that more forestlands will burn instead during uncontrolled, extreme conditions during peak fire season.

Recent extreme fire seasons have shown us the consequences of removing beneficial fire from the west's fire-dependent ecosystems. As you acknowledge in your May 20th statement, prescribed fire is one of the most valuable and effective tools for restoring and maintaining resilient conditions in the fire-adapted ecosystems common throughout the National Forest System. Unlike most mechanical fuel treatments, prescribed fire removes the surface fuels and smaller ladder fuels that have the greatest influence on fire behavior, while also accomplishing important ecological and cultural objectives. Additionally, prescribed fire is one of the only fuel reduction tools available to land managers across much of the landscape due to steep slopes, lack of economic incentives to remove smaller-diameter trees, and other factors. Greatly increasing the pace and scale of prescribed fire is a critical strategy for reducing unnatural fuel loads accumulated in our forests over more than a century of fire suppression, and for adapting to warmer, dryer conditions brought by climate change.

Despite its importance, prescribed fire is greatly underutilized, especially in the western U.S., due to a well-documented list of barriers to implementation including workforce capacity limitations, lack of available burn windows, and more. For



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decades, dedicated Forest Service staff, including fire managers, scientists, planners, and others, have been working collaboratively to overcome these barriers and have made extraordinary progress in building support for prescribed fire within the agency. We are anxious to see this hard-fought momentum maintained. We are also interested to ensure that the decision to pause prescribed burning does not inadvertently send the message to the public that prescribed fire—and not a century’s worth of fire suppression and climate change—is to blame for worsening fire seasons at a time when building public understanding of prescribed fire is more critical than ever. We intend to continue working to educate the public about the importance of fire in fire-adapted ecosystems and support the work of the Forest Service in this regard.

Another considerable barrier to increasing the pace and scale of prescribed fire is the need to build the social license necessary for land managers to use prescribed fire at a scale that matches the ecological need of our landscapes. The outdoor recreation community can be a key partner in helping create a social environment where the benefits, as well as the risks and tradeoffs, of prescribed fire are well understood by the public, and where land managers are supported in their work to restore fire where it is needed ecologically. Outdoor Alliance is interested in helping facilitate such a partnership, including through educational outreach to our community. Please consider us a partner in the Forest Service’s work to increase the pace and scale of prescribed fire in the west.

Thank you for your consideration, and we encourage you to lift the national pause on prescribed fire operations prior to the fall 2022 prescribed fire season.

Best regards,



Louis Geltman
Policy Director
Outdoor Alliance



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cc: Chris French, Deputy Chief, National Forest System

Adam Cramer, Chief Executive Officer, Outdoor Alliance

Chris Winter, Executive Director, Access Fund

Beth Spilman, Executive Director, American Canoe Association

Mark Singleton, Executive Director, American Whitewater

Kent McNeill, CEO, International Mountain Bicycling Association

Todd Walton, Executive Director, Winter Wildlands Alliance

Tom Vogl, Chief Executive Officer, The Mountaineers

Jamie Logan, Interim Director, American Alpine Club

Kaleen Deatherage, Interim Executive Director, the Mazamas

Keegan Young, Executive Director, Colorado Mountain Club

Chad Nelsen, Chief Executive Officer, Surfrider Foundation

