June 6, 2022

Randy Moore, Chief
US Forest Service
Sidney R. Yates Federal Building
201 14th St SW,
Washington, DC 20227

Dear Chief Moore:

We fully support the USDA Forest Service's (FS) concerns over the safe and effective application of prescribed fire and your leadership to reverse a century of fire exclusion in the context of a rapidly warming climate. As fire scientists and land managers affiliated with the international Association for Fire Ecology (AFE), we share your concerns about wildland fires and the ecological and human communities they impact and understand the intent of this pause.

Prescribed fires are a critical tool for "*Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America's Forests*" that you and Secretary Vilsack launched in January. Thank you for your leadership on this important document. The Bipartisan Infrastructure Law and its explicit investment in prescribed fire, ecosystem health, and safeguarding human communities provides strong support to the American people for living more securely with the inevitable return of fire.

Today, we ask you to **consider re-instating prescribed burning in areas on US National Forests that are not in extreme drought during the 90-day pause**. For example, Regions 8 and 9 are not currently experiencing drought, have a long history of success stories with prescribed fire, and show strong need for growing season burning. The recent NOAA drought forecast for the US shows that much of the area of Regions 8 and Region 9 will be amenable to continued burning actions. Moreover, allowing FS scientists to collect data on prescribed burns conducted by non-federal partners during this period would likewise maintain a national leadership stance in the study of prescribed fire. Once the national review is complete and it is deemed safe to do so, we ask that you **consider re-instating prescribed burning in the American Southwest and the western US, even if this occurs before the end of the 90-day pause**.

Prescribed fire is implemented on ~10 MM ac annually, exceeding the extent of US wildfires in most years. Across many diverse applications and a large suite of practitioners, **prescribed burning escapes are exceedingly rare**. Our best data suggest that 99.7 to 99.8% of all prescribed fires stay within their boundaries and achieve the intended prescription; an even larger percentage avoid any damage to homes and other assets. Due to the excellent leadership of your agency and other state, NGO, and federal partners, escapes have declined precipitously in recent decades. Escaped prescribed fires are thus newsworthy. However, the data support their extreme rarity and speak to the advances in training and implementation that the Forest Service and their partners have led.

Our nation's forests need prescribed fire now more than ever. **Prescribed fires are a primary tool to abate wildfire risks, to expand strategic and tactical locations for more effective suppression actions, and to maintain fuels in a state that is easier and safer to manage.** Prescribed fires are critical to restoring ecosystem resilience of native plant and animal communities and to other stressors, and to improving the vigor of forests warmed and dried by climate change. **Maintaining managers' abilities to implement prescribed fire is vital to our shared future.**

Much like the well-intentioned fire suppression policies of the past, we will never reach a "no escapes" prescribed burning future. We applaud pressing agency scientists and managers to continuously improve knowledge and practice with prescribed fire, fire behavior modeling, fire weather prediction, and continued investment in world-class fire training. The Association for Fire Ecology is committed to partnering with you to build these tools and their scientific underpinning.

Respectfully,

Co-Signing Members of the Association for Fire Ecology

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Christopher Adlam, Regional Fire Specialist, Oregon State University Extension Service

Heather Alexander, Associate Professor of Forest and Fire Ecology, Auburn University

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