

# NAFSR White Paper on the Proposed Farm Bill

## Concerns with Section 8408

June 1, 2026

The National Association of Forest Service Retirees (NAFSR) supports many parts of the proposed Farm Bill currently before Congress. We do have grave concerns about the inclusion of Sec. 8408 in the proposed bill.

### **Farm Bill Sec. 8408. Suppression of Wildfires**

*As written, this will require the Forest Service to suppress wildfires within 24 hours of detection on National Forest System lands that are high risk—Level 5 National Wildland Fire Preparedness, experiencing a D2, D3, or D4 drought (for context, 23% of the U.S. is currently in a D2-D4 drought), or are located in a fireshed ranked in the top 10% of wildfire exposure. This provision also restricts the USFS's ability to use beneficial fire, including managing naturally ignited wildfires and conducting prescribed fires.*

- "10 A.M. Policy" Parallel: This moves us back to the historic "10 a.m. Policy" (1933), which required fires to be controlled by 10 a.m. the day after detection, a directive that was found to have created the exact conditions we are dealing with currently.
- Fuel Accumulation: Decades of aggressive fire suppression prevent natural, smaller fires from clearing dead trees and underbrush. This allows fuel to build up, leading to hotter, faster, and more destructive fires when they eventually occur.
- More Severe Fires: Research indicates that trying to suppress all wildfires leads to higher proportions of burned area from a small number of extreme, high-severity fires.
- Ignoring Ecological Role: The policy may treat fire merely as a hazard rather than a necessary ecological process for ecosystem health and biodiversity.
- Dangerous Conditions: Requiring suppression in areas rated D2-D4 (severe to extreme drought) by the U.S. Drought Monitor, or at National Fire Preparedness Level 5, places firefighters in highly dangerous situations where suppression is often impossible.
- Reduced Flexibility: The restriction on firing operations (backfires) to only those ordered by incident commanders, rather than allowing for immediate tactical decisions, may limit the ability to protect crews.

Significant changes are taking place today, most of which are dramatic and rapid. Modified wildland fuel complexes, expanded wildland-urban interface (WUI) areas, increased human-caused fire numbers, changing climatic conditions, altered fire regimes, and shifting social/cultural perspectives provide little doubt that we are in a period of worsening complexity. These changes are triggering extensive and uncompromising, shifts in the behavior, extent, and

effects of wildland fires and it can be easily seen that the degree of difficulty in accomplishing wildland fire management objectives is becoming immeasurably more complicated

The Section 8408 language states, "(B) carry out wildfire suppression under subparagraph (A) in a manner that is consistent with interagency agreements and applicable standards of firefighter safety; It is important to note that the current FEDERAL WILDLAND FIRE POLICY, states that the #1 value to be protected is human life, once firefighters are assigned to a wildland fire, they become the #1 value to be protected. Regardless of PL, drought index or any other criteria, the expectation that unplanned ignitions are contained by 10 a.m. compromises the Fire Policy...the policy is effectively changed to the #1 priority is contain the fire, regardless of onsite conditions or safety factors.

Initial attack windows are collapsing - particularly at PL4/5 due to climatic and fuel conditions. This appears to unintentionally reward aggressive suppression where/when control is not possible. Prioritizing suppression by 10am without acknowledging limits of control will perpetuate high risk engagement. Extreme fire behavior, plume dominated, long range spotting, rapid spread; many fires are well beyond the logical IA control lines within minutes/hours during peak season, not within the 10am objective. This doesn't support risk-informed decision making (e.g., transition to point protection over containment; disengagement authority, etc.).

The proposed Farm Bill language imposes the 24-hour suppression containment mandate at National PL 5 which leads to committing fire suppression resources to every fire regardless of potential. It ignores the impacts on the availability of suppression resources and the enormous costs of implementing these mandates. Imagine the fire suppression resource commitment and costs of containing a 1000-acre fire in the Bob Marshall Wilderness within 24 hours. And both measures remove consideration of land and resource management objectives.

The proposed Farm Bill language is moving wildfire from a doctrinal based management model back to rule centered management. This removes "common sense " options from the tool box and removes local on-the- ground assessment of conditions from the decision process. Wildfire strategy and tactics will be decided at National Fire Centers (Boise and Salt Lake City) instead of by the boots on the ground.

Tactical responses to wildland fires must be coordinated, well thought out, and efficiently directed to safely accomplish desired objectives. Initial responses can be successful within their designed capabilities, but for those fires that escape initial actions, specific situational analysis and use of the full range of options must be considered and applied. Continuing to apply failed tactics or over-utilizing a particular tactic or type of firefighting resource, regardless of the specific situation, does not further protection objectives, but increase's costs and exposes firefighters and equipment to higher risk and exposure. Employing costly tactics repeatedly and increasing expenditures have not been shown to increase suppression effectiveness

The most recent step in developing a national framework and strategy for managing wildland fires was development of the National Cohesive Wildland Fire Management Strategy (USDI- USDA 2014). This Strategy represents a significant step forward and is the most comprehensive wildland fire management strategy ever completed. It introduces a highly relevant, logical, and supportable vision for the next century: *To safely and effectively extinguish fire, when needed; use fire where allowable; manage our natural resources; and as a Nation, live with wildland fire.* That vision has empowered strategic planning—nationally, regionally, and locally—to prepare appropriate management responses to wildland fires when they occur.

NAFSR believes that successful fire suppression begins with rapid, preplanned initial response. We believe this can include the use of wildland fire as a viable component of the full range of strategic options to achieve goals established in Land and Resource Management Plans (LRMPs). Every wildland fire response should be based on objectives, requirements, limitations, locations, and conditions identified in the LRMP and Fire Management Plan. Fire management decisions should be responsive to changing conditions—both during the fire and in the future. Fewer strategic options are available when fire danger rises while more options are possible when fire danger declines. All options must consider firefighter safety and exposure objectives.

Additionally, NAFSR believes that two factors are vitally important for the nation's forests. First, latitude in wildland fire management should be expanded, not narrowed. This requires that a full range of viable strategic options and tactics must continue to be available, including the ability to use fire in the right places and in the right ways to achieve resource benefits while also protecting firefighters, community residents, and property from harm. Second, continuing discussions are needed with stakeholders—other public agencies, community leaders, and citizens.