

Corbin Newman, Regional Forester  
C/o Lucia Turner, Acting Regional Forester  
U.S. Forest Service, Region 3  
33 Broadway, SE  
Albuquerque, NM 87102

Abigail Kimbell, Chief  
Forest Service  
U. S. Department of Agriculture  
Sidney R. Yates Federal Building  
201 14th Street, SW  
Washington, DC 20250

November 29, 2007

**Re: Fire Management Plans and Environmental Analysis**

Dear Mr. Newman and Ms. Kimbell,

We are writing as scientists with expertise in a variety of disciplines that are concerned with biological diversity, threatened and endangered species, fire ecology, and fire management effects on biodiversity. Our goal is to ensure that federal fire management policy and plans support and maintain the viability of native plant and animal species. We believe that the use of the best available science and consultation with the U.S. Fish and Wildlife Service should be requisites for Fire Management Plans.

The current Fire Management Plans for forests in the Southwest Region (New Mexico and Arizona) must be opened up to scientific review and public comment in order to ensure that fire policies are based on the best available science and will adequately safeguard native biodiversity. These plans never underwent independent scientific review and, as a result, many forests continue to suppress fires without regard to natural fire ecology. For instance, in response to a federal court order in 2005, the Forest Service has conducted an environmental analysis and environmental assessment to determine whether the continued nationwide aerial application of fire retardant to fight fires would result in any significant environmental impacts within the meaning of the National Environmental Policy Act of 1969.

At least two recent published articles have tied rising temperatures to longer and hotter summer wildfire seasons. In August, U.S. Geological Survey scientists found increased tree mortality and wildfire risk in California's Sierra Nevada were tied to rising temperatures.<sup>1</sup> And last year, an article published in the journal *Science* found that climate change is responsible for creating warmer springs, exacerbating large wildfires and making forest management techniques such as thinning and fire suppression less effective.<sup>2</sup> The *Science* article concluded that annual changes in wildfire frequency are "strongly linked" to earlier spring snowmelts and hotter temperatures during the summer that lead to a longer dry season.

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<sup>1</sup> <http://www.usgs.gov/newsroom/article.asp?ID=1716&from=rss>

<sup>2</sup> <http://www.sciencemag.org/cgi/rapidpdf/1128834v1.pdf>

In August, a GAO report to Congress highlighted the failure of federal land management agencies to prioritize climate change in their strategic plans.<sup>3</sup> The report concluded federal land and water resources are vulnerable to a wide range of effects from climate change, including changes in the timing of natural events such as wildfire, noting wildland fire size and severity are likely to further increase with climate change. In response, Forest Service Chief Abigail Kimbell acknowledged that only 12 of the 155 national forest plans address climate change.<sup>4</sup>

Many populations of native species have declined and some now occur as isolated remnants of what once were larger and more complex systems. Management policies and plans may have long-lasting impacts on this nation's forests and their native biodiversity. Since activities related to fire and fuels management may be factors in the decline of some species, we believe that one of the great strengths of the 2001 Federal Wildland Fire Management Policy is its prescription that each Fire Management Plan incorporate sound scientific principles that rely on the best available science. We ask that you consider scientific information and principles directly applicable to fire ecology, fire management and biological conservation in the U.S. Forest Service's Fire Management Plans in the Southwestern Region.

Sincerely,

The undersigned scientists

Thomas Antonio, PhD  
College of Santa Fe

Ana Davidson, PhD  
National University of Mexico

Dominick A. DellaSala, PhD  
National Center for  
Conservation Science & Policy

Robert W. Dickerman, PhD  
Museum of Southwestern Biology

T. Patrick Culbert, PhD  
University of Arizona

Vincent P. Gutschick, PhD  
New Mexico State University

Tim Lowrey PhD  
Botany- U.C. Berkeley

Brian Miller, PhD  
Wind River Ranch Foundation

David R. Parsons  
The Rewilding Institute

Jerusha Reynolds, PhD  
University of New Mexico

Gary W. Roemer, PhD  
New Mexico State University

Howard L. Snell, PhD  
University of New Mexico

Linda Wiener, PhD  
St. John's College

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<sup>3</sup> <http://www.gao.gov/new.items/d07863.pdf>

<sup>4</sup> GAO Faults Agencies over Global Warming. By John Heilprin. Associated Press. Sep 6, 2007.