



# WILD VIRGINIA

*Protecting your favorite wild places*

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## **Wild Virginia Position Paper: PRESCRIBED BURNING in NATIONAL FORESTS**

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Fire results from both natural forces and human activity. Fire frequency, intensity, and size vary as a function of climate and geography. Locations in the western U.S. tend to experience larger and more severe fires than do Virginia's forests. Most fires in eastern forests are ignited by humans, although some result from lightning strikes. The George Washington and Jefferson National Forests average 80 wildfires per year, 90% of which are human-caused and, while the average size is approximately 16 acres, the vast majority is relatively small. Natural burns from random lightning strikes occur primarily across the dry mountain ridges of the forest and are rare in more moist and fertile hollows, valleys and river bottoms.

Fire is an important ecological part of the many eastern forest types. Wild Virginia supports prescribed burning of National Forests in specific cases where it is deemed ecologically and financially feasible. We have significant concerns, however, about the increasing use of fire by public land management agencies in Virginia.

Public land managers use fire as a management tool, often stating a number of different reasons for its use. The use of prescribed fire in forests has increased in the last decade. Forest Service projections indicate a significant increase in the practice in the next decade over current and historical levels. This increase appears to be driven by the availability of public funds appropriated by Congress, primarily in response to widespread fires in high-risk areas of the west that resulted in major loss of property and life. Some of these funds are being used here, even though these lands generally do not pose the same level of risk to rural communities.

U.S. Forest Service District Rangers often fail to perform environmental impact studies with public involvement prior to implementing prescribed burns. The U.S. Forest Service regularly excludes burning projects, sometimes as large as tens of thousands of acres, from the NEPA process and public involvement. Wild Virginia believes that all prescribed burning projects should:

- Be subject to environmental review and public involvement.
- Articulate clear, important, feasible objectives; and consider whether negative effects outweigh the benefits.
- Articulate specific ecological, social, and economic benefits expected and consider the spatial and temporal contexts in which such benefits will occur. For example, it's not sufficient to say that a burning project will simply result in "fuel reduction" or "wildlife habitat improvement." Land managers should state which components of biodiversity will benefit from the project.
- Rely on a body of peer-reviewed scientific research in order to demonstrate the importance of objectives. For instance, if there is a need to maintain a particular species in a particular location for a distinct population segment to persist, the project may be justified.
- Demonstrate, through best available monitoring results and scientific studies, that there is a high probability of attaining the stated objectives. When data are not available, experimental projects should be small in scale.
- Incorporate monitoring before and after implementation, using comparable unmanipulated sites as controls.
- Honestly consider negative impacts and unintended consequences of projects. There are a number of potential adverse effects from burning, and they must be weighed carefully to determine if the benefits would outweigh the adverse effects. These effects may include (but are not limited to) increased air and particulate pollution, reduced carbon storage, increased soil pH, increased temperature, loss of nutrients, increased sediment loads, increased water temperature and pH, reduced populations of non-target species, and increases in invasive species.
- Be limited, closely monitored, and regulated because of declining air quality, high rates of asthma and respiratory distress, the proximity of Class 1 air quality areas and the superloading CO<sub>2</sub> into the atmosphere.