



Fire and Fuels Management; Ecological Issues

Eligible Objectors & Interested Persons for this issue:

- Washington Cattleman's Association
- Sierra Club/Alliance for the Wild Rockies
- Williamson Consulting

Objections:

- The proposed road density reduction will lead to inefficiencies and greater costs when managing fires, prescribed or not, as roads are commonly used as fuel breaks. This may mean fewer acres being treated and increased fire frequency and severity.
- The revised Land Management Plan (LMP) states wildland fires should be more accepted and less suppressed, but does not provide Plan Components incentivizing managers to not suppress fire.
- The final Environmental Impact Statement (FEIS) states fire suppression and insect outbreaks have resulted in fuel accumulation leading to "uncharacteristic" fire effects and scale. However, no data is presented to substantiate these claims.
- Table 60 of the FEIS "summarizes the change in fire return intervals for each vegetation type." That data does not describe a normal range for fire return intervals, only a single statistic for most vegetation types. The validity of this analysis is questionable.
- Calculations of future fire severity and fire return intervals do not take into account the impacts of climate change.
- The revised LMP does not show the current location of the Wildland Urban Interface (WUI). As a result the proposed management actions impacts on the WUI cannot be fully examined.
- The Colville National Forest has never adequately analyzed and disclosed the forest-wide cumulative impacts of its current policy of all-out fire suppression.
- The FEIS fails to disclose the limitations of its Fire Regime Condition Class modeling, which is the primary justifying analysis tool supporting the FEIS's Purpose and Need.
- Fire Regimes are used in the FEIS to demonstrate the departure of the forest from historic fire processes and vegetation conditions. This method likely has very limited accuracy and tends to overestimate the risk of higher-severity fire posed by fuel loads, as documented by studies of recent fires (Odion and Hanson, 2006). The FEIS does not disclose the limitations of this methodology.
- The FEIS does not disclose how vegetation patterns resulting from past logging and other management actions would influence future fire behavior.
- Achieving the "desired condition" outlined in the revised LMP and FEIS would only be possible under consistent resource extraction activities, which could undermine natural processes driving the forest's ecosystem.
- The FEIS fails to inform the public about wildland fire ecology and the restorative benefits of fire, instead emphasizing the restorative power of management actions.
- The FEIS fails to provide a full and detailed accounting of costs associated with fuels reduction and fire suppression.
- The revised LMP provides no long-term plan and funding proposal for maintaining reduced fuel conditions (e.g., how often areas will be treated following proposed treatments, how areas not needing treatment now will be treated as the need arises, etc.).



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- The revised LMP contains few explicit reference to the 1982 Planning Rule which guides NFMA implementing regulations. This makes it difficult to see how the revised LMP is prepared and meant to be consistent with and grounded in regulations written to guide planning under NFMA.
- The FEIS fails to provide an adequate analysis of the cumulative effects of fire suppression on the Colville National Forest.
- The FEIS does not change the pace and scale of fuels treatment to accomplish restoration to fire regime condition class I within a meaningful timeframe.
- The Purpose and Needs section of the FEIS fails to recognize uncharacteristic fire and fuels as a "significant issue" to promoting the productivity of the land.

Resolution Options Proposed by Objectors: None

There were no resolution options proposed by objectors on this issue, therefore, it will not be discussed at the Objection Resolution Meeting. The issue is being reviewed by the Reviewing Officer and will be addressed in the response to objections.