



Forest Health

Eligible Objectors & Interested Persons for this issue:

- Sierra Club/Alliance for the Wild Rockies

Objections:

- The final Environmental Impact Statement (FEIS) states higher fuel levels and tree mortality has amplified the severity of forest fires. This conflicts with scientific evidence that weather conditions are what govern the behavior of fires affecting the most forest acreage on an annual basis.
- The revised Land Management Plan (LMP) provides no way of measuring the resilience of ecosystems or how projects might influence forest ecosystem resilience. The revised LMP also discusses ecosystem resilience as a product of forest management (as opposed to it being a naturally occurring condition), which is inaccurate.
- The FEIS states the Desired Conditions for vegetation are designed around the Historic Range of Variability (HRV). Since climate change scenarios indicate changes to temperature, weather patterns, and precipitation differ from the "historical disturbance regimes", it does not make sense for the revised LMP to rely on static Desired Conditions to "increase resilience against climate change."
- The revised LMP and FEIS fail to cite any scientific study or dataset the agency used to set desired condition for forest structure (HRV) percentages. Other vegetation Desired Conditions have no basis in sound science or reliable data (e.g., Table 6, Table 7, Table 8). This violates the National Environmental Policy Act's (NEPA's) requirements for scientific integrity.
- The FEIS fails to acknowledge mixed-severity and even low-severity fire regimes result in variable stand conditions across the landscape through time.
- Assumptions that (1) drier forests do not experience stand-replacing fires, (2) fire regimes are frequent and nonlethal, (3) these stands are open and dominated by large, well-spaced trees, and (4) fuel amounts determine fire severity are not supported by science.
- The assumption fuel treatments under the revised LMP will result in predictable wildland fire effects is of considerable scientific doubt.
- The revised LMP demonizes the natural agents and processes of tree mortality. Minimizing these effects, a priority stated in the revised LMP, is inconsistent with best available science.
- There is no indication the vegetation type categories or the structure class definitions used in the FEIS are, scientifically speaking, valid for the purposes for which the Forest Service employs them.
- The revised LMP's Desired Conditions are based on vegetation models that have not been examined for reliability, validity, or limitations (in violation of the National Environmental Policy Act), and do not consider the potential impact of climate change.
- The FEIS contradicts itself. In some places it indicates large trees in the Eastside Screens can only be managed by fire, while in other places it indicates they can be cut to achieve management objectives.



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- Alternative R in the FEIS prioritizes cutting as a management alternative, giving timber interests special privilege.
- The revised LMP prescribes management treatments without adequately demonstrating the treatment effects would mimic the landscape pattern or reference conditions.
- The Colville National Forest (CNF) does not use scientifically validated or peer-reviewed metrics to describe the complex landscape pattern created by fire. The CNF therefore cannot make assurances that its management actions will result in habitat conditions that promote wildlife viability and adequately compensate for the adverse effects of proposed mechanical treatments.
- By prioritizing Desired Conditions for vegetation, the revised LMP fails to factor in many other components of the landscape that have adverse effects on the landscape, including:
 - Road density
 - Noxious weed occurrence
 - Miles of long-term stream channel degradation
 - Culverts
 - Human-induced detrimental soil conditions <1%
 - Maximum daily decibel level of motorized devices
 - Acres of significantly below historic range and variability snag levels
- Over the 15-year life of the revised LMP, only 180,000 acres would be manipulated by active management. The FEIS fails to disclose the impact that would result from so little acreage meeting desired conditions (which elsewhere are described as being achieved through active management).
- The natural process category “catastrophe” in FW-STD-VEG-04 is undefined.

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.