

Fuels and Fire: Management and Ecology Issues

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Objectors contend:

- 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 LMP directs that wildland fires should be more accepted and less suppressed, but does not provide Plan Components that incentivize managers not to suppress fire.
- The FEIS states that 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.
- FEIS Table 60 "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* LMP does not show the current location of the Wildland Urban Interface (WUI). How the proposed management actions impact the WUI therefore cannot be fully examined.
- The CNF 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 the Fire Regime Condition Class modeling, which is the primary justifying analysis tool supporting the EA's Purpose and Need.
- Fire Regimes are used by the FEIS to support the position that there are significant departures of the forest from historic fire processes and vegetation conditions. The FEIS does not disclose the limitations of this methodology. 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 how the vegetation patterns that have resulted from past logging and other management actions would influence future fire behavior.
- Achieving the “desired condition” outlined in the LMP and FEIS would only be possible under consistent resource extraction activities that 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 emphasizes 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 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.).
- The LMP contains few explicit reference to the 1982 36 CFR 219 planning rule which guides NFMA implementing regulations. This makes it difficult to see how the 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 NF.

- **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 FEIS does not recognize uncharacteristic fire and fuels as a "significant issue" to promoting the productivity of the land in the Purpose and Need section.**

Response:

There are a number of directives, policies, and agreements that govern wildland fire management. Principle among these would be the National Fire Plan, the National Cohesive Wildland Fire Management Strategy, and the Federal Wildland Fire Management Policy. Primary themes from this direction are: 1) Firefighter and public safety is the first priority in every wildland fire management activity, 2) Management of wildland fire will be coordinated across all levels of government, and 3) Wildland fire is an essential ecological process and natural change agent.

The Forest Plan and the FEIS incorporate by reference the principle agency direction noted above as well as other laws, regulations, and policies. What follows is noted application in the planning record that addresses the selected contentions and comments above.

Road access is a component of wildland fire management, but it is not the most important component. Over time, as the forest moves from primarily wildfire suppression to primarily wildland fire management, existing fire boundaries should be more important than roads in regards to wildfire extent.

Incentivization of wildfire managers is not a forest plan component or decision.

The FEIS has an extensive discussion of fire regime and fire regime condition class, and mean fire return intervals additional background is incorporated by reference.

Climate change is clearly listed as one of the needs for change of the revised LMP. Climate change is discussed extensively in the FEIS, Vol. 1, page 147-157, and while site-specific prediction of change is not possible, regional change predictions are disclosed. Vulnerabilities and management strategies are discussed.

The planning team coordinated with local communities and defers to the Community Wildfire Protection Plans (CWPP) for the most detailed description of the wildland urban interface (WUI) areas. Approximations of WUI were used for some analysis and where CWPPs did not fully cover the land base.

The project record (FEIS, Vol. 3, Appendix G parts 1 and 2) sufficiently describes the assumptions and metadata behind the state-and-transition vegetation modeling of existing and future conditions. This modeling forms the basis of the descriptions by alternative of fuel and wildfire conditions and impacts.

Sierra Club/Alliance for Wild Rockies indicates support for the National Cohesive Wildland Fire Management Strategy. That strategy is one of the principle directives for wildland fire management and the Agency also supports it.

The FEIS and the public notices clearly indicate that the LMP is being revised under the guidance of the 1982 planning rule.

The revised LMP objective components regarding wildland fire are specific, measureable, and achievable. Execution of the objectives should move the planning area towards the desired conditions. I calculate the mean fire return interval would be about 60 years across all vegetation types including maintenance of treatments and wildfires. This would be an improvement over current conditions for most of the planning area.

From the perspective of a NEPA document, Wildland fire management is not a significant issue in the Colville NF. The action alternatives are nearly identical regarding wildland fire management. However,

wildland fire management is clearly treated as a publically-significant issue (an issue of public interest) as demonstrated by the amount of discussion the topic is afforded in the revised LMP and the FEIS.

Conclusion:

Most of the Objectors' concerns listed in the 18 bullets and the 11 associated comments above seem to be procedural in nature as opposed to specific objections to management intent.

The project record spans over a decade of research and analysis. During that time some wildland fire terminology has changed and some policy has been updated. However the fundamental assessment and analysis in the project record is basically sound. The plan exhibits a balance of managing public safety, working with partners, and recognizing fire's role in the ecosystem.

As a reviewer, I'm concerned about the reliance on Fire Regime Condition Class. This is a crude tool to guide management actions, monitor the effects of those actions, and it is not well-correlated with wildfire risk or with wildfire severity. The main point of the scientific article referenced by Sierra Club/Alliance for Wild Rockies is that natural wildfires are very diverse in spatial extent and variation of severity and therefore an effective means of restoring biological diversity. However, it should be noted that Odion and Hanson (2006) was a study from the Sierra Nevada of California and may have limited application to NE Washington. The reliance on FRCC is not ideal, but also it is not a fatal flaw.

Because the forest plan components are grouped by resource area and then grouped by management area, the components seem less integrated than plans where all of the components types (like desired conditions) are grouped together. Typos and inconsistent language belie the enormous level of effort that went into these documents.

POSSIBLE INSTRUCTIONS (if any):

The Plan and analysis would be strengthened by reference to and application of a wildfire risk assessment. Also a greater reliance on fire ecology, possibly through further discussion of fire regimes, would be helpful. In other words: A more detailed description of the existing and desired pattern and process by vegetation type and fire regime. It should be noted that, like the objector, the Forest is interested and concerned about ecosystem form and function, however the Agency is also concerned about public safety and coordinated wildfire response as per Law, Regulation, and Policy. The Colville NF Plan represents an attempt to balance those sometimes conflicting concerns.

Current management of wildland fire on the landscape often incorporates the concept of risk and being able to compare risk in one location to the risk found in another location. However, risk maps and risk analysis are constantly changing. The record might be strengthened with incorporation (by reference) of the most recent regional risk assessment for the Pacific Northwest. It should be acknowledged that the risk assessment will change over time. This is similar to the approach the forest plan takes in regards to Wildland Urban Interface. WUI is constantly changing, primarily self-identified by communities, and is best assessed in conjunction with site-specific proposals. Incorporation of a larger scale wildfire risk assessments would be appropriate.