

Survey and Manage
Additional Clarifying Questions and Answers
About MR Amendments for Fuel Hazard Reduction Treatments
Around At Risk Communities

Group 1 – Certain Fungi, Lichens, Bryophytes, Vascular Plants

The Management Recommendations (MRs) in Attachment 1 were sent to the field previously as draft, for comments. Many of the comments were then addressed by making changes to the final version of the MR amendments and/or transmittal letter. Most of the comments that could not be accommodated by edits are addressed in the clarifying Questions & Answers below.

1) Comment: The application area and conditions (1 to 1 ½ miles, certain fuels types, etc.) are so limiting that we cannot conduct all high priority fuels treatments.

Response: The limits presented in these amendments define where the MR amendments apply, and do not limit the size or scale of fuel treatment areas. Before species experts writing these amendments could determine how much risk to take at individual sites, they needed to understand the area and conditions to which the amendments would apply. An area large enough to cover the highest priority treatment areas for the next 2-3 years, but small enough to allow for significant site-specific flexibility was identified as being 1 to 1 ½ miles from community boundaries. Fuels treatments in areas not meeting the specific conditions listed in Attachment 1 should continue to follow existing MRs (or in the case of those species without existing MRs, use the latest information and best professional judgment), or individual sites may be dealt with on a case-by-case basis through exemptions listed under other Survey and Manage (S&M) Standards and Guidelines (S&Gs). These and other amendments may be expanded to more areas when experience with fuels treatments and/or additional species information indicates such amendments would continue to meet overall species persistence objectives.

2) Comment: Many of the draft amended MRs do not permit a full range of fuels treatments within S&M sites located within the critical first 300' zone associated with developments and structures. It appears that field units will be expected to manage known sites in these areas by exclusion of certain fuel treatments. This will continue to be problematic to effectively manage areas surrounding communities.

Response: For many of the species whose MRs are amended here, the risks associated with allowing “any necessary fuels treatments” is considered acceptable within the critical first 300 feet around developments and structures. For other species, their rarity and/or the nature of the habitat they're likely to occupy preclude such additional risk in this zone. It is highly unlikely that these species will be found within 300 feet of a structure/development of a community at risk within the identified fire regimes and condition classes. However, if a site for one of these species is found within 300' of a structure, and the MR amendments do not provide enough flexibility to safely meet fuels management objectives, other avenues of addressing this concern should be pursued.

Field units could pursue exceptions to site management through processes described on S&Gs pages 8, 10, and 13 (including the local identification of non-high priority sites, the exemption of site management through REO) and they should contact the S&M Program Manager to help resolve the issue.

3) Comment: We're finding species in these areas other than the 24 contained in the MR amendments.

Response: With over 300 Management Recommendations in place to date, it was not practical, nor biologically supportable, to amend them all. Instead, administrative units were asked to identify "species that will likely occur in significant numbers within proposed fuels treatments areas and have the potential to prevent proposed activities from accomplishing fuels management objectives". Every administrative unit responded. This list was then modified to remove from consideration species no longer listed as S&M species, or whose life history characteristics, limited range, or rarity are not likely to pose a considerable risk to accomplishing fuels management objectives. The remaining list included the species whose MR amendments are enclosed. Additionally MRs for red tree vole, several amphibians and mollusks are also being amended.

4) Comment: We question why only three watersheds in the entire subject area are deemed eligible for functional recognition, and why the California Klamath Province is excluded in some sections.

Response: At the time of the development of these MR amendments, The Dalles, Dufur, and Ashland watersheds were the only designated "municipal watersheds" known to be the subject of active fuels reduction project planning. There was an opportunity at the beginning of the amendment process for the fuels planners representing their agencies/Regions to add additional watersheds for consideration during the MR amendment development. No additional municipal watersheds were identified at that time. There was a need to limit the acres to which these amendments apply in order to be able to quantify risk – in other words, a more inclusive definition to broadly apply to municipal watersheds in general would have reduced the management flexibilities in the final product. The applicable area for these MR amendments may be expanded after some experience is gained regarding their use and effectiveness or if additional information is obtained regarding proposed treatment areas.

5) Comment: There is no current federal policy that mandates a 1.5 mile zone as the only zone of concern around communities. It was included in the Sierra Nevada Framework, with a 0.25 mile defense zone and an additional 1.25 mile threat zone. From the R5 Regional Criteria for Determining Wildland/Urban Interface (WUI), March 5, 2002: "The Region defines wildland urban interface as the line, area, or zone where structures and other human development meet or intermingle with developed wildland or vegetative fuels. The actual boundaries of the urban wildland intermix are determined locally, based on the actual distribution of structures and communities adjacent to or intermixed with national forest lands. The management objective in the urban wildland

intermix/interface is to enhance fire suppression capabilities by modifying fire behavior and providing a safe effective area for possible future fire suppression activities.” Mapping the 1.5 mile zone on the Six Rivers NF shows many areas where this line falls mid-slope with no possibility of use because of lack of safe access and economic constraints. Instead we are proposing a strategic threat zone that extends to the next logical control point – typically a major ridge with a road, that offers safer access and increases the chance of suppression success.

Response: The WUI boundary is not mandated to be 1.5 miles, and nothing in the MR amendments should be interpreted as a distance limit to WUI-related fuels reduction work. However, there was a need to identify and somewhat limit the area to which the amended MRs would be applied, so that the area subject to additional site persistence risks afforded by these MR amendments could be quantified. The author team, in discussions with selected Regional Office and Forest fuels planners, determined that the most intense fuels treatments, and therefore the most potential conflicts, would occur within this 1-1.5 mile zone. Further, as the distance from town increases, the options for finding fuels treatments compatible with the original MRs also increase.

Fuels treatments in areas not meeting the specific conditions listed in Attachment 1 should continue to follow existing MRs (or in the case of those species without existing MRs, use the latest information and best professional judgment), or they may be individually dealt with on a case-by-case basis through exemptions listed under other S&M S&Gs.

6) Comment: The Federal Register list of communities focused on high population sites, based on the 1990 census. The Six Rivers does have additional smaller communities that we still feel are at risk from wildfires, and these will be included by name within our Fire Management Plan. In addition, there are many individual structures/homesteads that are not part of a community, but still would warrant some fuel treatment attention on Federal lands. Federal grants are currently available for landowners to use for fuel treatments on their land, with the stipulation that fuel treatments are in place or in progress on adjacent Federal lands.

Response: Although it’s unclear what role the census played in the identification of communities, the issue is moot; clearly additional structures warrant fuels treatments, federal grants are available outside the area to which these MR amendments are applied, and so forth. However, there was a need to define the geographic area to which the MR amendments applied, before they could be written. Unable to locate a California WUI map, the authors worked from the list of communities and knowledge of their general size. From that, they quantified potential risks and amended the MRs accordingly. Expansion of the applicable area assumed by the authors, no matter how appropriate from a fuels treatment needs standpoint, would necessitate re-assembling the authors so they could reassess overall risk and make any appropriate changes in the MR. Such an exercise would likely have a depressing affect on overall flexibility, and would require a large expenditure of their time.

Again, field units are encouraged to continue pursuit of fuels reduction treatments outside of the areas covered by these MR amendments. If an S&M species is located within areas

that are not addressed by these amendments (i.e., are not on the Federal Register list) apply the existing MR, not these amendments.

7) Comment: For those species and areas where no special management is specified within 300 feet of communities at risk, surveys should also not be required.

Response: From the transmittal memo: “Some of the attached MR amendments recommend that “any treatment” to reduce fuels within the critical first 300 feet surrounding developments and structures associated with a community can occur with no mitigation for the S&M site needed. For these species, in these situations, pre-disturbance surveys are not required.” The MR amendments plus the language in the S&M S&Gs on page 22, paragraph 2, permits the line officer to forego surveys where the MR permits the proposed treatment anyway.

8) Comment: Often times developments and structures on private land are not placed along the property line, so this 300 foot “fuel treatment zone” may fall totally on private land, partially on public land, or almost completely on public land. We are looking at the immediate fuel treatments zone to start at the private land boundary. Private landowners are hopefully looking into options to treat the first 300 feet on their own property.

Response: The communities are defined by number of residences, not amount of private lands. The 300-foot language in these MR amendments applies only to S&M sites located within 300 feet of a structure or development. Language in the Federal Register speaks in terms of community edge, not private land edge. The assumption provided to the MR amendment authors is that the 300 feet begins at the structure, not the property line. There is presently no science that can justify moving this boundary to the property line since the purpose of the 300 feet is to protect the structure, not the property.

9) Comment: One area that needs to be clearly addressed in these MRs is the anticipated impacts to species persistence in light of the likely outcome that both rare and uncommon S&M sites will be lost despite their rarity, location, or contribution to the species. This is especially the case within the critical 300 foot zone around developments and structures. The MRs should clarify why this is not significant in terms of persistence.

Response: Because S&M includes species about which little is known, application of the S&Gs requires a lot of “best professional judgment”. To permit high-priority fuels treatments, taxa leads and taxa specialists determined that overall species persistence objectives would be met while still permitting some risk to individual site occupancy. This determination took into consideration the species information available through the Interagency Species Management System (ISMS database), the Final Supplemental Environmental Impact Statement (FSEIS) for S&M, and other information. The S&Gs at page 20 specify such risk is appropriate. The 300-foot zone, as well as the entire 1-1.5 mile zone, was considered both in terms of the percentage of habitat within species’ ranges, and for the number of overlapping known sites. In both cases, the amount of area or number of known sites where these MRs would be applied was quite small relative to

the current number of known sites or potential habitat. Further, these amendments typically continue to specify maintenance of occupied habitat features, but may reduce the buffering of those features to allow for some level of increased risk. Even for the 300-foot zone for species where all necessary fuels reduction treatments are acceptable, some portion of occupied sites are expected to remain.

10) Comment: In some cases, the taxa teams allowed for a certain percentage of site loss in the 1-1.5 mile radius of the community at risk. For instance, the vascular plant amendments allow for 10 percent of the *Cypripedium fasciculatum* sites, an uncommon species, to not require any protection. Where did the “10 percent” come from?

Response: This species is uncommon and thus all sites are not needed for persistence. However, since the current MR does not contain criteria for separating high and non-high priority sites, 10 percent was determined to be a large enough number of sites to provide needed flexibility, but small enough to keep potential negative effects to the species at an acceptable level. This percentage was determined to be an acceptable risk by the vascular plant MR amendment authors, based on the large number of currently known sites and the likelihood that sites will fall within the areas covered under these MR amendments. Additional non-high priority sites could be identified through the 4-step process (2001 Record of Decision, S&Gs page 10) that was issued to the field last fall.

11) Concern: Concern about scope of projects...after a field trip to Northern California, the taxa leads were concerned with how the Community and Risk definitions were being applied; how the communities in California seem much larger than they originally were led to believe.

Response: This was a significant issue and needed to be dealt with to the satisfaction of the authors. When the MR amendments were drafted, no WUI boundary map was available for California. Unable to locate a California WUI map, the authors worked from the list of communities and knowledge of their general size. They then quantified potential risks and amended the MRs accordingly. However, when the authors recently saw a map of communities being developed by California forests, the area delineated was many times larger than what the authors had envisioned.

To resolve this issue/concern of the taxa leads, there were two approaches that could be undertaken. One, the leads could reconvene and reassess the flexibility they provided in the amendments to then apply to the larger areas identified by the California forests as wildland urban interface areas. It is likely that this choice would result in far less flexibility, as the application of the MRs, and therefore the potential increased risk to site occupancy, would be spread over a larger area. In addition, this option would be time-consuming, during a time period when the leads are working on other larger scale, high priority projects. The second option was to develop or determine a map of the California communities to which these MRs could be applied, reflecting the scope/area intended by the taxa leads. This second option was pursued.

Recently the California Department of Forestry (CDF) provided maps showing community boundaries for northern California “communities-at-risk”. After an

extensive examination of this map, it was determined that the map showing “urban” and “interface” areas with 1.5 mile buffers closely approximates the areas the authors intended to address when they developed these amendments (these are areas where housing density is greater than 1 house per 5 acres). “Rural” areas, defined by CDF as 1 house per 5 acres or greater, are not included as areas to which these MR amendments apply. A reply due request (dated May 30, 2002. Refer to: 2630 (FS)/1736PFP (BLM)(OR-935)P) has been sent to each administrative unit asking for actual planned treatment areas for the next 3 years. Once this information is compiled, these MR amendments may be reconsidered by the interagency Survey and Manage staff for application to a larger area.

11) Comment: We are concerned that reference is not made to the role of unit specialists in developing site-specific mitigations and in matching flexibility with treatment effects. As it is, field employees still do not have flexibility to adjust MRs to local conditions on the basis of professional experience and interdisciplinary input. In fact, some of the MRs are written very prescriptively.

Response: The MR amendments are intended to provide general guidance to be used by local specialists in managing S&M sites around communities at risk. Although in some cases prescriptive recommendations are given within these MR amendments, local S&M specialists should help determine the intent and applicability of these amendments to specific situations, and document their rationale.

12) Comment: It’s unclear how some buffer widths were determined. Are these based upon habitat requirements? If so, please reference.

Response: Best professional judgment determined generalized widths, based on the best information available to the taxa leads, experts, and teams. As noted above, authors gathered all available species information as well as information about what specific fuels treatments looked like, current fuel loadings, and the risk of wildfire, and evaluated this information in relation to risk to site occupancy.

In some cases, these widths are larger than many units may have been applying with interpretations of existing MRs. In such cases, the specified width should not be viewed as reflecting on previous interpretations made by field units. S&M sites should be managed according to either the original MR or the amendment; they should generally not be managed with a combination of recommendations from both.

13) Comment: We’d prefer the term “underburning” to broadcast burning. Which is correct.

Response: The fire terminology documentation given to the authors (fuels experts from both FS regions and BLM were present and did not object) showed underburning to be a subset of broadcast burning. Broadcast burning was defined as the application of fire across the entire project area as opposed to jackpot burning where fire is only applied to

that part of the project area where fuels are concentrated. Given that virtually all treatments around S&M sites will be within forested stands, both terms are technically correct, but we have used the term “broadcast burning” for these amendments.

14) Comment: Flame height and flame length seem to be used interchangeably, but are different things. Can you clarify?

Response: All references to “flame height” have been changed to “flame length”, since that’s the more meaningful measure of fire intensity and therefore, effect.

15) Comment: The application criteria on the front of the MRs include “fire regime 3A, less than 50 year natural fire return interval”.

<http://www.fs.fed.us/fire/fuelman/firereg.htm> does not include a 3A, but describes fire regime 3 as 35-100+ years. Where did 3A come from?

Response: The 3A comes from the PNW variant to the national regimes. When the MR amendment process was initiated last fall, the national focus for implementation of the NFP was just on fire regimes 1 and 2 as priorities. Fuels specialists presented the case to the amendment authors that additional fire regimes should also be covered by these amendments. This 3A subdivision (of 35-50 year fire return interval) was presented to MR authors by the FS/BLM fuels specialist working with the project, and other fuels specialists present did not voice a concern. Therefore, these MR amendments apply only to those stands in fire regime 1, 2, and 3a, which includes only those stands with a natural fire return interval of 50 years or less.

It’s important to note that the limits and definitions for where the enclosed MRs may be applied are in no way meant to limit or otherwise imply fuels treatments may not be done elsewhere, or in different conditions, following the original MRs. The definitions used here helped quantify the application area for the authors, so they could focus on the highest priority areas and better quantify the level of risk associated with related treatments.

16) Comment: We need a definition of “low intensity fire” because it’s not always “4 foot” flame length.

Response: The various authors of the MR amendments considered different flame lengths to result in a “low intensity” fire for their particular species/taxa group. This reflects the variation in response to fire that is likely to occur within the different taxa, and ranges from 2-4 feet.