

January 9, 2006

Maggie Pittman, District Ranger
Missoula Ranger District
Building 24-A Fort Missoula
Missoula, Montana 59804

Transmitted via email--please acknowledge receipt!

RE: Fuels Hazard Reduction Project in Grant Creek

Maggie:

These are comments on the proposed Fuels Hazard Reduction Project in Grant Creek are submitted on behalf of the Native Forest Network and National Forest Protection Alliance.

Our comments are based on our collective experience with Forest Service proposals over the past two decades, in addition to site-specific observations we made during an on-the-ground fieldtrip to the project area in June 2005 with Lolo National Forest officials.

Unintended Consequences of Fuel Reduction Treatments

The proposed Fuels Hazard Reduction Project in Grant Creek is very close to Missoula and in an area of high recreational use. The Snowbowl ski area is driving much of the recreational use as more and more visitors use it during the summer. As we've mentioned to the USFS on previous occasions, we are concerned that increased access from fuel reduction activities leads to increasing vandalism, dumping and illegal ATV trails similar to what we have encountered while monitoring other fuel reduction projects on the Lolo National Forest.

Up until last year, we had never really thought about the unintended consequences of these thinning activities in terms of inviting more vandalism, dumping, illegal ATV trails and other user-created trails due to the opening up of the forest from logging equipment running skid trails through the woods. However, we believe it's a potential problem for this project and something that the Lolo National Forest should look at/analyze. We are also concerned about the spread of weeds, particularly spotted knapweed, from logging operations.

In other words, will the logging, skid trails, etc associated with the treatments proposed as part of the Middle East Fork Hazardous Fuel Reduction project increase the likelihood of vandalism, dumping, illegal ATV trails, weeds in the project area?

Variation of Forest Type Within Project Area

As we're sure you are aware, the proposed Fuels Hazard Reduction Project in Grant Creek project area contains a fair amount of variation in terms of slope and aspect that directly affects forest composition. For example, some units are primarily south-facing, fairly steep-sloped, drier and the vegetation consists mainly of Ponderosa pine and Douglas fir, while other units offer a greater mix of north-facing slopes, cooler aspects and moister habitats harboring a mixed-conifer forest type. It would be helpful for us if the Forest Service could identify the areas where parklands exist or used to exist so we can compare them to what's growing there now.

The reason we bring up the variation within the project area is because we continue to be very concerned with what we would characterize as the U.S. Forest Service's "war against Douglas fir" and other shade tolerant species. As you are aware, Douglas fir is a native tree species that provides valuable wildlife habitat for nesting cover and food sources for many wildlife species. We are also worried that thinning in these denser, moister stands will dry out the forest leading to hotter conditions during fire events.

Fuel Reduction, Not Commercial Logging, Should Drive This Project

If the "idea" of this project is fuel reduction, then we do not believe that as part of this project larger Douglas firs in the 12" to 20" range should be cut down. We are greatly concerned that under the parameters of this project that these large Douglas firs – the largest trees within certain parts of the units – could actually be cut down under the guise of "fuels reduction." It appears that the only justification for this is financial so the receipts can be used to pay for thinning in other project units.

Being quite familiar with the area and having spent time within the project area units, we feel confident that the U.S. Forest Service can achieve its fuel reduction goals by focusing on brush and trees 12" and under.

Historic Reference Conditions

The LNF prefaces this project by commenting that various influences have altered historic forest conditions such that today there is an increased probability of uncharacteristic fire. But the BNF has provided no information on historic vegetation characteristics (habitat types, stand age or structure, tree density, basal area, species composition, etc.), historic fire regime data, or even a definition of what an "uncharacteristic" fire is.

Furthermore, the use of an historic baseline, or reference condition, is not an advisable approach to defining project goals for two main reasons.

- 1) There are significant challenges and frequently substantial deficiencies in data on historic forest or fire regime conditions that can then lead to problems in defining project goals. These deficiencies must be recognized and accounted for if they are to be

incorporated into the decision making process for the proposed Fuels Hazard Reduction Project in Grant Creek.

2) In addition to the difficulty of accurately assessing historic conditions, there is the ultimate question of whether such baseline conditions serve as an apt measure of success for a project focused on land stewardship. There is no obvious reason to assume that our assessment of historic conditions should be used as a measure of current desirability. Local climate has changed significantly over even the last one hundred years, likely having impacts on natural fire regimes. As a result the goal of returning the forest to historic conditions is not necessarily commensurate with restoration of ecological integrity.

Ultimately, the LNF should provide clear justification for why historic conditions are used as a baseline estimate of success for this project and how historic conditions were arrived at if they are to be used at all in such a manner. For the reasons stated above, we would recommend avoiding the use of historic conditions as a measure of success.

Fire is Most Proven/Effective Method of Fuel Reduction

We continue to believe that the best, most proven, method for fuels reduction is fire. We are supportive of the hand slashing and under-burning that is proposed. We remain supportive of fuel reduction done in such a manner because we believe it is the most beneficial in terms of effectively reducing fuels and returning fire to these fire adapted ecosystems.

We just are not convinced that fuel reduction is achieved by cutting down trees up to 20” in diameter, especially in a forest where a 20” diameter tree is in the top 10% of large trees, and then simply burning the piles of logging slash without running a prescribed burn through the units.

Except for the danger these fires might pose to nearby communities, it would seem that allowing wildfires to burn would be the cheapest and most effective method of creating the LNF’s desired heterogeneity.

There are many clear steps that the LNF can take – in cooperation with local homeowners and communities – to reduce the risk of negative impact of wildfires to neighboring communities while still deriving the benefits of allowing wildfires to burn. Current research suggests that treating the home ignition zone is sufficient to protect homes from igniting in a wildfire. Further measures may be taken within the Community Protection Zone (within one-quarter mile of homes) to help protect firefighters.

The other reason for this rationale is the fact that research indicates that the ponderosa pine actually require fire to scorch their bark periodically if they are to grow to more of the “old-growth” characteristics, which we are also supportive of. In other words, by just doing mechanical fuel reduction and no under burning, you are not following the best available science in terms of ponderosa pine forests.

Along these same lines, we'd like to call your attention to the report from Forest Trust titled "The Effects of Fuel Management on Fire Behavior in Ponderosa Pine: The Status of our Knowledge" (<http://theforestrust.org/images/swcenter/pdf/WorkingPaper2.pdf>). This paper assesses existing research on the effectiveness of hazardous fuel reduction in changing wildfire behavior. The authors review more than 250 papers that evaluate three types of fuel treatment in relation to fire behavior in western forests: prescribed fire, mechanical thinning, and a combination of thinning and burning. The authors also survey the literature to evaluate recent suggestions by policy makers that commercial logging can be used to treat dense forest fuels. The paper focuses on ponderosa pine forest types.

Major findings of the report include:

- Although the assertion is frequently made that simply reducing tree density can reduce wildfire hazard, the scientific literature provides tenuous support for this hypothesis.
- The literature leaves little doubt, however, that fuel treatments can modify fire behavior. Thus, factors other than tree density, such as the distance from the ground to the base of the tree crown, surface vegetation and dead materials play a key role. Research has not yet fully developed the relationship among these factors in changing fire behavior.
- Substantial evidence supports the effectiveness of prescribed fire, a treatment that addresses all of the factors mentioned above. Significantly, several empirical studies demonstrated the effectiveness of prescribed fire in altering wildfire behavior.
- By contrast, we found a limited number of papers on the effects of mechanical thinning alone on wildfire behavior. The most extensive research involved mathematical simulation of the impact of mechanical thinning on wildfire behavior. However, the results of this research are highly variable.
- A more limited number of studies addressed the effectiveness of a combination of thinning and burning in moderating wildfire behavior. The impacts varied, depending on the treatment of thinning slash prior to burning. Again, crown base height appeared as important a factor as tree density. The research community is still building a scientific basis for this combination of treatments.
- The proposal that commercial logging can reduce the incidence of canopy fire was untested in the scientific literature. Commercial logging focuses on large diameter trees and does not address crown base height - the branches, seedlings and saplings which contribute so significantly to the "ladder effect" in wildfire behavior.
- We found the fewest studies in the most reliable class - empirical research. We found the greatest number of studies in the least reliable class of research - reports of personal observation. Several other reviews of the literature confirm this finding, stating that the evidence of the efficacy of fuel treatment for reducing wildfire damage is largely anecdotal.

- The results of simulation studies are highly variable, in terms of such factors as fire spread, intensity and the occurrence of spotting and crowning.
- Scientists recognize that large scale prescribed burning and mechanical thinning are still experimental and may yet reveal unanticipated effects on biodiversity, wildlife populations and ecosystem function.

Roads: Sediment in Streams and Safety Issues

How many tons of sediment from the roads within the project are currently dumping into streams within the proposed Fuels Hazard Reduction Project in Grant Creek? How will this project increase sediments into streams through log truck traffic and heavy equipment traffic associated with the commercial logging aspects of this project? These are important questions for assessing impacts to native fisheries in Grant, Butler and LaValle creeks and we would like to see the Environmental Assessment address any effects on fish in these drainages.

Another concern that we have heard echoed by homeowners and landowners in the Grant Creek area is the safety issue associated with log truck traffic and heavy equipment traffic associated with the commercial logging aspects of this project. The Grant Creek road is a county road and is heavily used. Who will pay for damage to the county part of the Grant Creek Road from log truck and heavy equipment traffic? What about safety issues in terms of the amount of commuter traffic and school traffic on that road in the mornings and evening hours. We are concerned about school children waiting for the school buses in the morning near the roadway while log trucks and other heavy logging equipment is running up and down the Grant Creek Road.

Thank you for taking the time to review our comments. If you have any questions, feel free to contact us.

Sincerely,

Matthew Koehler
Native Forest Network
PO Box 8251
Missoula, MT 59807
406.542.7343

Jake Kreilick
National Forest Protection Alliance
PO Box 8264
Missoula, MT 59807
406.829.6353